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April 30, 1997

JSPLTR #97-0087

U. S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, D. C. 20555

Subject : Dresden Nuclear Power Station Units 2 and 3  
Individual Plant Examination for External Events (IPEEE)  
Generic Letter 88-20, Supplement 4  
Docket Numbers 50-237 and 50-249

At a meeting with the NRC on March 31, 1997, ComEd representatives presented information concerning the results of the Quad Cities (QC) IPEEE assessment of internal fires in response to Generic Letter 88-20, Supplement 4. The status of Dresden Station's IPEEE assessment was also reviewed. It was noted that preliminary results of the Dresden IPEEE assessment will be available later this year. However, based on plant configuration and fire protection program differences between the two stations, Dresden expects a lower core damage frequency (CDF) resulting from our IPEEE assessment. The NRC Staff requested that Dresden document this expectation and how Dresden will administratively manage potential vulnerabilities identified during the assessment. The purpose of this letter is to provide the requested documentation.

Based on a review of QC IPEEE-Fire, and Dresden's plant configuration and fire protection program, Dresden personnel have concluded that significant differences exist between the two plants. Dresden Station personnel also reviewed the top three QC risk significant sequences which involve the Reactor Feed Pump (RFP) rooms against corresponding areas at Dresden Station. This qualitative review through walkdowns and document reviews identified physical differences between the Stations as discussed below.

The majority of Dresden's safe hot shutdown procedures (eight out of ten) rely on the Isolation Condenser (IC) associated with the affected unit. The IC is a simple and highly reliable decay heat removal system. The IC historically has high availability and requires few simple manual actions to initiate steam flow and shell side make up water.

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QC relies on opposite unit equipment and/or power for all of their hot shutdown paths where as twenty percent of Dresden's hot shutdown paths require opposite unit equipment and/or power.

Dresden's unqualified cables are protected with noncombustible coating in the Auxiliary Electric Equipment Room. This coating reduces the risk of fire spread which would cause plant shutdown requiring Control Room evacuation.

In addition, Dresden has certain areas, such as the RFP Rooms, protected with complete automatic fire suppression coverage. Furthermore, key cable trays are strategically fire wrapped to allow timely automatic actuation of fire suppression system.

Dresden's RFP rooms are different from QC RFP Rooms in that they include a RFP lube oil collection system hard-piped to floor drains, and complete automatic fire suppression system coverage. Additionally, only single Division and balance of plant cables are routed through the Dresden RFP Rooms. Off-site power cables and bus ducts are routed outside the potential area of influence of the Dresden RFP rooms, whereas at QC they are routed through the RFP rooms. Although unit Emergency Diesel Generator (EDG) buses are routed through the RFP rooms, Dresden safe shutdown procedures using the IC, unit common (2/3) EDG and opposite unit power buses, provide a simplified method for decay heat removal to preserve safe shutdown (SSD) capability in the event of an RFP room fire.

Based on lessons learned from QC, Dresden has reprioritized project tasks so that those areas which potentially contribute to high CDF could be identified earlier than previously planned. Additionally, Dresden intends to apply assumptions with the Fire Probabilistic Risk Assessment Methodology that reflect realistic and conservative plant conditions and responses. Dresden is currently pursuing alternate shutdown strategies to alleviate the risk should potential vulnerabilities emerge. Such vulnerabilities would be considered for reportability and operability, and corrective actions commensurate with their significance would be implemented. The Nuclear Station Work Procedure, NSWP-A-15, "Integrated Reporting Program" provides adequate guidance to address potential vulnerabilities. Corrective actions, if any, would be tracked to completion per Dresden Administrative Procedure 2-15, "Site Program for Commitment and Corrective Action Management."

Based on the differences between Stations, Dresden Station expects to achieve a lower CDF than QC Station. Processes are in place to address potential vulnerabilities resulting from IPEEE-Fire. Dresden has planned and is taking contingency measures to alleviate the risk of potential vulnerabilities.

USNRC  
April 28, 1997

Page 3

If you have any questions concerning this matter, please contact Mr. Frank Spangenberg, Dresden Station Regulatory Assurance Manager, at (815) 942-2920, ext. 3800.

Sincerely,



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