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April 8, 1980

Mr. D. L. Ziemann, Chief
Operating Reactors - Branch 2
Division of Operating Reactors
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Subject: Dresden Station Unit 2
Fire Protection
NRC Docket No. 50-237

Dear Mr. Ziemann:

This letter is to document the March 26, 1980 telecon between Messrs. H. K. Stolt and T. A. Pickens of Commonwealth Edison Co., Mr. L. Derdarian of the NRC Staff, and Mr. M. Antonetti, an NRC consultant. During this telecon, the following information concerning the Dresden 2 Turbine Building Mezzanine Area fire protection facilities was discussed.

There are grouped cable trays which pass through the Unit 2 Turbine Building Mezzanine area. There are twelve cable trays stacked one above the other with approximately 15 inches separating each tray from the one above it. The 15-inch separation is measured from the top of the lower tray to the bottom of the upper tray. A second stack of four cable trays runs parallel to and north of the top four cable trays in the first stack of cable trays. All of the cable trays are solid bottom trays.

The lower three trays are in one safety division and the upper four trays are in the second safety division. There are five trays, that hold non-safety related cables, which separate the one safety division trays from the second safety division.

The Sandia Test Report SAND 78-1456 (NUREG/CR-0381) "Preliminary Report on Fire Protection Program Fire Barriers and Fire Retardant Coatings Tests" describes tests on solid bottom cable trays which indicate that a solid bottom tray is at least as good a fire barrier as any of the other coatings which were tested and reported on in this Sandia test report. There is no advantage from a fire protection point of view in adding additional coatings to the

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cable. Therefore, CECO. will not coat the cables in these trays with a fire protective coating.

The cable trays are protected with a pre-action, low pressure air monitored, fixed automatic water fire suppression system. The sprinkler heads have a 175⁰F fusible link and are located on approximately 10-foot centers along the length of the trays. The heads are located at each tray level and projected between the cable trays to the center line of the cable tray.

The sprinkler heads are monitored with a low pressure air system such that if a head opens for any reason, an alarm is sounded in the control room. Fire detectors are located at just below the ceiling level which actuate the water valve, admitting water to the sprinkler system.

Hose stations are located in the vicinity which provide backup protection.

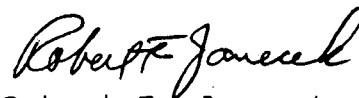
The "Fire Protection Safe Shutdown Analysis for Dresden Units 2 and 3" dated June 4, 1978 Section 1.3(2)b. discusses the Unit 2 Turbine Building Mezzanine Floor (Fire zone 8.2.6) and concludes that the cable passing through this zone is not necessary to achieve a safe shutdown, e.g. a safe shutdown is possible given the loss of all cable in this fire zone.

Considering the above discussion, it is CECO.'s position that the fire prevention and protection features in the Dresden Unit 2 Turbine Building Mezzanine area are adequate and provide a high degree of plant safety.

Please address any questions you may have concerning this matter to this office.

One (1) signed original and thirty-nine (39) copies of this transmittal are provided for your use.

Very truly yours,



Robert F. Janecek
Nuclear Licensing Administrator
Boiling Water Reactors