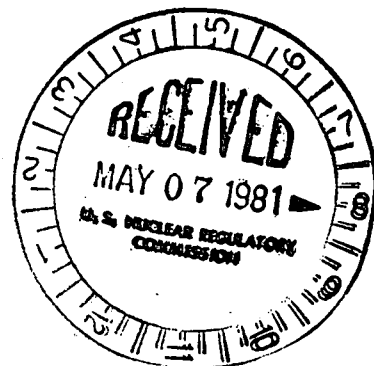




Commonwealth Edison
One First National Plaza, Chicago, Illinois
Address Reply to Post Office Box 767
Chicago, Illinois 60690

March 18, 1981



Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Subject: Dresden Station Units 2 and 3
Fire Protection Features to
meet 10 CFR Part 50, Appendix R
NRC Docket Nos. 50-237/249

Dear Mr. Denton:

In accordance with the requirements of 10 CFR 50.48(c)(5), Commonwealth Edison Co. hereby submits our plans and schedules to meet the provisions of 10 CFR Part 50, Appendix R, Sections III.G, III.J., and III.O for Dresden Units 2 and 3. Attachment 1 contains our plans for implementation of the requirements of Appendix R, Sections III.G, III.J., and III.O.

In addition, Attachment 2 contains our plans and schedules for meeting other fire protection requirements which were previously accepted by the NRC Staff in Fire Protection Evaluation Reports or supplements.

As indicated in these attachments, Commonwealth Edison Co. believes it will meet the applicable requirements of 10 CFR 50.48 and Appendix R for Dresden Units 2 and 3 in accordance with the schedules provided therein.

Please address any questions concerning this matter to this office.

Very truly yours,

Robert F. Janecek
Nuclear Licensing Administrator
Boiling Water Reactors

Attachments

cc: RIII Inspector, Dresden

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Attachment 1

Dresden Station Units 2 and 3

Appendix R Items

Item III.G.

In response to item III.G. (safe shutdown) of Appendix R Commonwealth Edison Company has made the following submittals:

1. "Fire Protection Safe Shutdown Analysis".
Dresden Units 2 and 3
June 1978.

This document was transmitted to the NRC in a letter to G.E. Lear from M.S. Turbak dated June 5, 1978.

2. "Additional Information Concerning Fire Protection Safe Shutdown Analysis Dresden Units 2 and 3".

This information was transmitted to the NRC in a letter to T.A. Ippolito from R.F. Janecek dated January 23, 1980.

3. "Fire Protection Safe Shutdown Analysis" Supplement 1
Dresden Units 2 and 3 dated January 1980.

This document was transmitted to the NRC in a letter to T.A. Ippolito from R.F. Janecek dated January 24, 1980.

4. "Response to NRC letter dated October 1, 1980. Fire Protection Safe Shutdown" Dresden Units 2/3.

This information was transmitted to the NRC by letter to D.G. Eisenhut from R.F. Janecek dated October 31, 1980.

5. "Fire Protection Safe Shutdown Analysis" Supplement 2 Turbine Building Mezzanine"
Dresden Units 2 and 3
January 1981

This document was transmitted to the NRC by letter to T.A. Ippolito from R.F. Janecek dated February 10, 1981.

A fire area has recently been identified where a fire could impede safe shutdown and which has not been included in earlier submittals on safe shutdown. The area identified is the DC Distribution Center for each unit. A fire in this area could result in the loss of 125V DC power to both safety divisions for the unit in which a fire is postulated.

Corrective action is being taken which will isolate DC power in this fire area for one safety division from the second safety division with a three hour fire barrier. Details of this analysis and design modification will be submitted by May 19, 1981. The work associated with this modification will be completed in accordance with Paragraph 50.48(c)(4).

The preceding list of submittals and information describe a method for safely shutting down the plant in the event of fire in any other fire area which, we believe, meets the intent of item III.G of Appendix R.

Item III.J.

In response to item III.J. of Appendix R Commonwealth Edison Company has committed to install emergency lighting units with an 8 hour battery power supply in areas needed for operation of safe shutdown equipment and access and egress routes thereto. This installation will be completed in accordance with Paragraph 50.48(c)(2), 9 months after the effective date of 10 CFR 50.48 and Appendix R (November 17, 1981).

Item III.O.

This item is not applicable to Dresden Station since the containments are inerted during normal operation.

.Attachment 2

Dresden Station Units 2 and 3

Safety Evaluation Report Items

On December 2, 1980 in a letter to J.S. Abel from T.A. Ippolito the NRC issued a Supplement to the Fire Protection Safety Evaluation Report for Dresden Units 2 and 3. Section 2.0, Modifications, identifies one item which is incomplete. This item requires that bench tests be conducted to verify that detectors will respond to combustion products that might be present in each area where detectors are located.

In a letter to T.A. Ippolito from R.F. Janecek dated February 6, 1981 C.E.Co. described a test and committed to do the test verifying the sensitivity of the smoke detectors.

In a letter to J.S. Abel from T.A. Ippolito dated February 12, 1981 the staff accepted C.E.Co.'s proposal for testing smoke detectors. These tests will be completed in accordance with Paragraph 50.48(d)(2), 12 months after the date of the NRC staff Fire Protection Safety Evaluation Report accepting such features which is February 12, 1982 (12 months after letter dated February 12, 1981 since this particular item is not specifically accepted in the SER).

Open Items Requiring Additional Information

In a letter to J.S. Abel from T.A. Ippolito dated October 27, 1980 the staff provided C.E.Co. with a summary of Staff Requirements to Resolve Open Items.

In a letter to T.A. Ippolito from R.F. Janecek dated February 6, 1981 C.E.Co. provided additional information to resolve the open items identified in the October 27, 1980 letter.

In a letter to J.S. Abel from T.A. Ippolito dated February 12, 1981 the staff has accepted the C.E.Co. proposed resolutions to the open items. These open items which require modifications are:

1. In the Unit 2 Turbine Mezzanine area it is necessary to provide shields along the lengths of cable trays and smoke detectors under the shields to insure that the smoke detectors will operate and energize the pre-action sprinkler system protecting the cable trays.
2. Discharge nozzles will be added to the Halon and the CO₂ suppression systems to protect under the floor in the computer room and in the small tunnel area in the auxiliary electrical equipment room. These will be extensions to the existing gas suppression systems in the auxiliary electric equipment room.

These modifications will be completed in accordance with Paragraph 50.48(d)(2), 12 months after the date of the NRC staff Fire Protection Safety Evaluation Report accepting such features which is February 12, 1982 (12 months after letter dated February 12, 1981 since acceptance of these particular items is not addressed in the latest SER.)

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