



Commonwealth Edison
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May 18, 1983

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
Quad Cities Station Units 1 and 2
Schedular Exemption Request
Appendix R - Sections III.G.3 and
III.L Fire Protection Modifications
NRC Dockets Nos. 50-237, 50-249,
50-254, and 50-265

- References (a): D. B. Vassallo letter to L. DelGeorge
dated December 30, 1982.
- (b): D. M. Crutchfield letter to L. DelGeorge
dated January 19, 1983.
- (c): B. Rybak letter to H. R. Denton
dated February 25, 1983.

Dear Mr. Denton:

Per References (a) and (b), your staff has transmitted your Safety Evaluation Reports for Quad Cities and Dresden Stations as evaluated against the requirements of Sections III.G.3 and III.L of Appendix R to 10 CFR Part 50.

10 CFR Part 50.48(c)(4) requires non-outage related modifications be completed within six months after NRC approval. Modifications that require plant shutdown need to be completed during the first refueling outage, or another planned outage that lasts for at least 60 days or an unplanned outage that lasts for at least 120 days, after 180 days beyond NRC approval.

In Reference (c), Commonwealth Edison notified the NRC that we were in the process of obtaining an architect-engineer (A/E) to design the needed modifications and that we would submit a schedule for completion of this work. We are now in a position to submit a detailed schedule for both outage and non-outage work which appears in the form of attachments to this letter. Despite prompt and timely selection of an architect-engineer, based on realistic engineering, material procurement and installation requirements the 10 CFR 50.48 schedule cannot be achieved for all the required modifications. Accordingly, we are requesting specific schedular exemptions for each of the affected modifications.

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This exemption request is unavoidable for two basic reasons - detailed design work could not begin until after NRC approval and delivery times for both safety and non-safety related materials are of a length to require the exemption requests. Not all modifications require an scheduler exemption. Again the schedules for completion for both Stations are enclosed.

These completion schedules are based on discussion with the architect-engineer, manufacturers, and construction personnel who will provide the needed services and materials. Considering the required lead times, along with the proposed outage schedules, we clearly identified a reasonable completion date for each area requiring modification.

Furthermore, it is our opinion that the granting of the exemption will not endanger life or property as the stations have an adequate defense-in-depth fire fighting capability and fire detection systems.

To the best of my knowledge and belief the statements contained herein and in the attachment are true and correct. In some respects these statements are not based on my personal knowledge but upon information furnished by other Commonwealth Edison employees. Such information has been reviewed in accordance with Company practice and I believe it to be reliable.

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

One (1) signed original and sixty (60) copies of this letter with its attachments are provided for your use.

Very truly yours,



B. Rybak
Nuclear Licensing Administrator

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Attachments

cc: Region III Inspector - Dresden
Region III Inspector - Quad Cities
R. Gilbert - NRR
R. Bevan - NRR

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50-237

ATTACHMENT 1

Non-Outage Related Modifications

A schedular exemption is requested for the non-outage related modifications for Dresden Station Units 2 and 3 and Quad Cities Station Units 1 and 2. 10 CFR 50.48(c)(4) requires these modifications to be completed six months after NRC approval. Our non-outage related proposed fire protection modification completion schedule are as follows:

DRESDEN STATION

<u>Modification</u>	<u>Completion Date</u>	<u>Exemption Justification</u>
1. Upgrade fire doors	4/01/84	Steel locked doors currently exist. Upgrade will provide fire-rated locked doors. Minimum procurement time for doors is five months.
2. Local Control and Isolation of Service Water Pumps at Switchgear	2/01/84	Engineering, procurement and installation require seven months lead time. A spare service water pump is available.
3. Additional Fire Detection and Water Suppression	9/01/84	All areas of plant have some detection and suppression. Design engineering and detector procurement lead time of 12 months

QUAD CITIES STATION

<u>Modification</u>	<u>Completion Date</u>	<u>Exemption Justification</u>
1. Fire Doors	4/01/84	Steel locked doors currently exist. Upgrade will provide fire-rated locked doors. Minimum procurement time for doors is five months.
2. Additional Fire Detection and Water Suppression	12/01/84	All areas of plant have some detection and suppression. Modification requires seven months design engineering, four months procurement, six months installation.
2. Replace existing barrier between 480VAC switchgear with seismic fire barrier	2/01/84	Removable block wall currently in place. New fire barrier requires three months design engineering, three months procurement and four months installation.

ATTACHMENT 2

Outage Related Modifications

10 CFR 50.48(c)(4) states that modifications which require plant shutdown need to be completed during the first refueling outage, or another planned outage that lasts for at least 60 days or an unplanned outage that lasts for at least 120 days, after 180 days beyond NRC modification approval. Based on realistic engineering, material procurement and installation this schedule cannot be achieved. A scheduler exemption is requested to this completion schedule to allow a practical fire protection outage-related completion schedule. The Dresden and Quad Cities Stations completion schedule are as follows:

DRESDEN STATION

<u>Modification</u>	<u>Completion Date</u>	<u>Exemption Justification</u>
1. Isolation Condenser Valves	Dresden 2 Spring Outage 1986	Modification involves design and procurement of a qualified safety-related alternate power supply and access to inboard isolation condenser valves.
	Dresden 3 Spring Outage 1985	
2. Control Rod Drive Header Cross Tie Piping	Dresden 2 Fall Outage 1984	No exemption required
	Dresden 3 Fall Outage 1984	
3. 2/3 Diesel Modifications	Unit 3 Outage 1985 for all modifications to be complete	Modification involves new safety-related bus duct, switchgear.
4. Auxiliary Cooling Water Supply to the CRD Pumps	Unit 2 Fall Outage 1984	Modification involves new cooling water supply to CRD (long procurement lead time required for valves).
	Unit 2 Spring Outage 1985	
5. Diesel Generator #3 Fuel Oil Transfer Pump Local Control and Isolation in Diesel Generator Room.	Unit 3 Fall Outage 1983	No exemption required
6. Local Reactor Pressure Indication	Unit 2 Fall Outage 1984	No exemption required.
	Unit 3 Fall Outage 1983	

QUAD CITIES STATION

<u>Modification</u>	<u>Completion Date</u>	<u>Exemption Justification</u>
1. Alternate Feeds to Diesel Generators 1/2 Auxiliary Equipment	Quad Cities 1 Fall Outage 1985	Modification involves procuring and installing independent power supplies to four major safety-related components associated with the diesel generators. Installation of unit dedicated diesel generator components must be accomplished during an outage of that Unit.
	Quad Cities 2 Spring Outage 1985	
2. Alternate Feeds to Diesel Generators 1/2 Cooling Water Pump Cubicle Coolers	Quad Cities 1/2 Fall Outage 1985	Modification involves procuring and installing safety-related components involving both units. Procurement requires long lead time.
3. Diesel Generator 1/2 Vent Fan Isolation	Quad Cities 1/2 Fall Outage 1983	No exemptions required.
4. Fire Protection of 4-kV Switchgear	Quad Cities 1 9/01/84	Modification involves replacing transit wall with fire barrier wall separating division of the 4-kV switchgears.
	Quad Cities 2 7/01/85	
5. Fire Protection of 125-VDC Control Power to 4-kV Switchgear and 4-kV bus duct	Quad Cities 1 Fall Outage 1985	Modification involves extensive cable rerouting and fire protection all of which are outage related.
	Quad Cities 2 Spring Outage 1985	
6. RCIC Steam Supply Valve Local Control Capability	Quad Cities 1 Spring Outage 1984	No exemption required for Quad Cities 1. Quad Cities 2 will complete at the outage following procurement of materials.
	Quad Cities 2 Spring Outage 1985	
7. RHR Pump Cable Rerouting and Fire Protection	Quad Cities 1 Spring Outage 1984	No exemption required for Quad Cities 1 Requires long installation periods of conduit, cable and fire protection material.
	Quad Cities 2 Spring Outage 1985	

<u>Modification</u>	<u>Completion Date</u>	<u>Exemption Justification</u>
8. Alternate Feeds to RHR Room Coolers	Quad Cities 1 Spring Outage 1984	Modification involves design, procurement, installation of safety-related qualified transfer switches switches cables and control stations. No exemption is required for Quad Cities Unit 1
	Quad Cities 2 Spring Outage 1985	
9. RHR System Fire Protection	Quad Cities 2 Spring Outage 1985	Modification is coordinated with (5). Involves extensive rerouting and fire protection and fire protection of conduits.
10. Install Safe Shutdown System	Quad Cities 1 Fall Outage 1985	Modification involves designing, procuring and installing a back-up RCIC motor-driven safe shutdown systems. Procurement time is approximately 15 months
	Quad Cities 2 Spring Outage 1985	
11. Diesel Generator 1/2 Cooling Water Pump Isolation Capability	Quad Cities 1/2 Spring Outage 1985	Modification involves design, procurement and installation of safety-related qualified components which require long procurement and qualification lead times.