



**Commonwealth Edison**  
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March 30, 1984

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  
Updated Scheduler 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 May 18, 1983.
- (d): B. Rybak letter to H. R. Denton  
dated December 23, 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 submitted a detailed schedule for both outage and non-outage work which appears in the form of attachments to that 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 could not be achieved for all the required modifications. Accordingly, we requested specific scheduler exemptions for some of the modifications. We have received no response to date on this request.

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March 30, 1984

By this letter we are updating our May 18, 1983 schedular exemption request to reflect the completion of certain items and extensions of certain dates. For the sake of completeness all Appendix R modifications identified to date are listed in the attachments whether or not the work now requires an schedular exemption. The completion dates are the current projected dates for the work yet to be completed; for the work already finished the completion date is the date which work was completed.

Reference (d) identified a review of our Appendix R program given the recent NRC clarifications on Appendix R requirements. It is our intent to notify your staff in the future of the need for any additional modifications and/or exemption requests. This letter only applies to those modifications identified in Reference (c).

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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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 Appendix R fire protection modification completion schedule is as follows:

DRESDEN STATION

<u>Modification</u>	<u>Completion Date</u>	<u>Exemption Justification</u>
1. Upgrade fire doors	March, 1984	Exemption request no longer required. Physical work completed.
2. Local Control and Isolation of Service Water Pumps at Switchgear	March, 1984	Exemption request no longer required. Physical work completed.
3. Additional Fire Detection and Water Suppression	1/01/85	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	March, 1984	Exemption request no longer required. Physical work completed.
2. Additional Fire Detection and Water Suppression	2/01/85	All areas of plant have some detection and suppression. Modification requires seven months design engineering, four months procurement, six months installation.
3. Replace existing barrier between 480VAC switchgear with seismic fire barrier	2/01/84	Exemption request no longer required. Analysis shows existing wall is acceptable.

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 outage-related completion schedule. The Dresden and Quad Cities Stations completion schedule is 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 to inboard isolation condenser valves and access to the outboard isolation condenser valves.
	Dresden 3 Spring Outage 1985	Access to outboard isolation condenser completed.
2. Control Rod Drive Header Cross Tie Piping	Dresden 2 Fall Outage 1984	No exemption required
	March 1984	No exemption required, Physical work completed.
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 3 Spring Outage 1985	
5. Diesel Generator #3 Fuel Oil Transfer Pump Local Control and Isolation in Diesel Generator Room.	March, 1984	No exemption required, Physical work completed.
6. Local Reactor Pressure Indication	Unit 2 Fall Outage 1984	No exemption required.
	Unit 3 Fall Outage 1983	No exemption required, Physical work completed, equipment functional.

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	February, 1984	No exemptions required, Physical work completed.
4. Fire Protection of 4-kV Switchgear	Quad Cities 1 10/01/84	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 considerable installation 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 Fall Outage 1985	Modification involves design, procurement, installation of safety-related qualified transfer switches switches cables and control stations.
	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.