



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

March 1, 1985

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
Scheduler Exemption Requests
NRC Docket Nos. 50-237, 50-249,
50-254, and 50-265

- References (a): B. Rybak letter to H. R. Denton
dated May 18, 1983.
- (b): B. Rybak letter to H. R. Denton
dated December 23, 1983.
- (c): B. Rybak letter to H. R. Denton
dated March 30, 1984.
- (d): B. Rybak letter to H. R. Denton
dated August 10, 1984.
- (e): B. Rybak letter to H. R. Denton
dated December 18, 1984.

Dear Mr. Denton:

Commonwealth Edison requested scheduler exemption, per Reference (a), for both Dresden and Quad Cities Stations for the Appendix R work we originally envisioned in early 1983. However, in Reference (b), Commonwealth Edison notified the NRC that, because of recent NRC clarifications on Appendix R requirements for all licensees, we initiated an independent review of both Dresden Units 2 and 3 and Quad Cities Units 1 and 2's Appendix R programs.

Additional modifications and exemptions to Appendix R were found necessary at both Stations. The modifications consist mainly of additional suppression and detection and the upgrading of fire barriers and emergency lighting. The exemption requests fall generally into two categories - (1) the lack of complete 3 hour barriers and (2) the lack of suppression and detection throughout all fire areas.

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The modifications and exemption requests for both Dresden and Quad Cities Station was reviewed at meetings with members of your staff and formal submittals were made per References (d) and (e).

Because the necessary engineering and procurement had not proceeded for the new modifications to the point where we could determine projected completion dates, no schedular exemptions were requested in our previous submittals. By this letter Commonwealth Edison hereby requests schedular exemption to the provisions of 10 CFR 50.48(c)(4) for the new modifications. The completion dates for both the new and old modifications are provided in Attachments A thru D. The necessary interim compensatory measures for all of the modifications have been previously submitted. We have reviewed those interim measures and feel they are still applicable until the individual modifications are complete. These interim measures were initiated where necessary to provide an additional level of protection until they will be discontinued as their corresponding modification is completed.

Commonwealth Edison believes our Appendix R reverification efforts demonstrates that in the case of a fire at either Station, the affected unit(s) can be safely shutdown. The additional modifications are necessary to meet the literal requirements of Appendix R. Our interim compensatory measurements allow for a reasonable schedule to complete the remaining Appendix R work. Therefore, we feel schedular exemption to 10 CFR 50.48 is justified.

Commonwealth Edison has acted in good faith to comply with the provisions of 10 CFR 50.48. CECO had initiated its own program to verify compliance with Appendix R after a series of clarifications issued by the Staff. CECO had identified thru its own program the need for additional modifications and began engineering and procurement prior to any NRC review and approval in order to be in full compliance with Appendix R in as expeditious a manner as possible. Our commitment to compliance with Appendix R can also be seen, in part, in our track record for completion of the old modifications and our ambitious schedule for the new work. No major delays has occurred in completion schedule for the old work. The only significant slippages were due to changes in refueling outages; in many cases the work was completed ahead of schedule and all remaining work is on schedule. For the new modifications all but two items will be complete within the same timeframe as the original work. Therefore, the period needed to be in compliance even with the verification efforts and new work, will not be significantly different than originally proposed in Reference (a).

March 1, 1985

This submittal in no way predicates the identification of additional Appendix R modifications or interim compensatory measures that might result from compliance reviews and or further NRC clarification (e.g., I&E Information Notice 85-09).

Pursuant to 10 CFR 170, a fee remittance of \$150.00 is enclosed.

Please address any questions you may have regarding this matter to this office. One signed original and forty (40) copies of this letter is provided for your use.

Very truly yours,



B. Rybak

Nuclear Licensing Administrator

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Attachments

cc: R. Bevan - NRR
R. Gilbert - NRR
NRC Resident Inspector - Quad Cities
NRC Resident Inspector - Dresden

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ATTACHMENT A

Appendix R Fire Protection Modifications
Dresden Station

New Modifications

<u>Modification</u>	<u>Completion Date</u>	<u>Remarks</u>
Fire Detection and Suppression	Fall '86 Outage*	Installation will begin by June 1985
Fire Barrier Pipe and Conduit Penetration Seal	Fall '86 Outage*	Will involve access to high radiation areas. 75% of work will be complete by 01-01-86.
Curbing in the Cribhouse	06-01-85	
Emergency Lighting	06-01-86	
Fire Dampers	Fall '86 Outage	Unit 3 outage-related activities will be completed during the Fall '86 outage.
Transfer Switch for DG 2/3 Cooling Water Pump	Fall '85 Outage	Outage related activity. Installation of safety related transfer switch.
Relocate Local Control Station for MCC	Fall '85 Outage	Outage related activity.
Installation of Fire Doors	07-01-85	
Fire Wrap of Conduit	Fall '86 Outage*	Final Cable and completion date is dependent on installation of alternate feeds to inboard iso. condenser valves.

*Refueling outage for Unit 2, presently scheduled for Fall 1986.

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Dresden Station
New Modifications
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<u>Modification</u>	<u>Completion Date</u>	<u>Remarks</u>
Alternate Feeds to Reactor Pressure and Level Transmitters	Unit 2-Fall '86 Outage* Unit 3-Fall '87 Outage	Outage related activity. May involve procure- ment of safety related instrumen- tation.
Access to Cold Shutdown Motor Operated Valves	06-01-86	Involves instal- lation of galleries in high rad. areas
HPCI Room Curbs	06-01-86	
Alternate Access to Iso. Condenser Pipe Chase	Unit 2-Fall '84 Outage Unit 3-Fall '85 Outage	Outage-related activity

*Refueling outage for Unit 2, presently scheduled for Fall 1986.

ATTACHMENT B

Appendix R Fire Protection Modifications
Dresden Station

Original Modifications

<u>Modification</u>	<u>NRC Commitment</u>	<u>Remarks</u>
Installation of Fire Doors	04-01-84	Complete
Alternate Feed to Inboard Iso. Condenser Valves	Unit 2 Fall '86 Outage Unit 3 Fall '85 Outage	On Schedule On Schedule
Access to Out- board Iso. Condenser Valves	Unit 2 Fall '86 Outage Unit 3 Fall '85 Outage	Ahead of schedule- expected to be Complete by 04-85. On Schedule
CRD Pump Crosstie	Fall '84 Outage	Work completed ahead of schedule
Service Water Pump Local Control and Isolation	02-01-84	Complete
DG 2/3 Modifications	Fall '85 Outage	On Schedule
Fire Detection Suppression	01-01-85	Installation Complete
Auxiliary Cooling Water Supply to the CRD Pumps	Unit 2 Fall '84 Outage Unit 3 Fall '85 Outage	Complete On Schedule
Local Control and Isolation of DG 3 Fuel Oil Transfer Pump	Fall '83 Outage	Complete

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Original Modifications

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<u>Modification</u>	<u>NRC</u> <u>Commitment</u>	<u>Remarks</u>
Local Reactor Pressure Indication	Unit 2 Fall '84 Outage	Complete
	Unit 3 Fall '83 Outage	Complete

Appendix R Fire Protection Modifications
Quad-Cities Station

New Modifications

<u>Modification</u>	<u>Completion Date</u>	<u>Remarks</u>
Fire Barrier Penetration Seals	Fall 1986 Outage	Involves access to high radiation areas. Unit 1 Outage related work will be completed during the Fall '86 Outage.
New 125 V DC Cross tie Between Swgr. 13-1 and 23-1	5-1-85	Not Outage related; involves safety related equipment procurement.
Fire Suppression & Detection	Fall 1986 Outage	Installation will begin by August 1985. Unit 1 Outage related work will be completed during Outage beginning about 1-1-86.
RCIC Vacuum Pump & Condensate Pump Isolation	1-1-86	Not Outage related; involves equipment procurement.
Fire Wrap DG $\frac{1}{2}$ Cooling Pump Feed	8-1-85	Not Outage related; involves material Procurement.
Remove Check Valve in DG1 and DG $\frac{1}{2}$ Cooling Pump Crosstie Line	Spring 1985 Outage	Dual Outage related
Addition of fire doors between Unit 1 and Unit 2 RCIC and RHR Corner Rooms	9-1-85	Not Outage related; involves material procurement.
Alternate feed from MCC 19-1 to RHR Room Cooler 2-5746A	Fall 1986 Outage	Outage related; involves safety related equipment procurement.

New Modifications

<u>Modification</u>	<u>Completion Date</u>	<u>Remarks</u>
Capability to de-energize RCIC Turbine Governor Flow Control	9-1-85	Not Outage related; involves equipment procurement.
Isolation of DG $\frac{1}{2}$ Breaker Interlock Logic	Fall 1986 Outage	Outage related; involves safety-related equipment procurement. Modification to allow simultaneous breaker closure to Unit 1 and Unit 2 switchgear was completed in December, 1984.
Local control of Unit 2 RCIC Steam Supply Valve	Fall 1986 Outage	Outage related; involves safety-related equipment procurement.
Reroute of 250VDC cable to MCC 2A	Fall 1986 Outage	Outage related
Installation of fire dampers in HVAC ducts penetrating fire barriers	Spring 1987 Outage	Involves access to high radiation areas. Unit 2 Outage related work will be completed during the Fall '86 Outage.
Installation of additional Emergency Lighting	5-1-86	Not Outage related; involves a walk-down of access routes and equipment procurement.

Appendix R Fire Protection Modifications
Quad-Cities Station

Original Modifications

<u>Modification</u>	<u>NRC Commitment</u>	<u>Remarks</u>
Installation of Fire Doors	2-1-84	Complete
Alternate Feeds to DG $\frac{1}{2}$ Auxiliaries	Unit 1, Fall '85 Outage Unit 2, Spring '85 Outage	On Schedule On Schedule
Alternate Feeds to DG $\frac{1}{2}$ Cooling Water Pump Cubicle Coolers	Fall 1985 Outage	A reverification analysis calcu- lation has shown that this modification is not needed. Therefore, this modification is cancelled.
DG $\frac{1}{2}$ Vent Fan Isolation	Fall 1983 Outage	Complete
Separation of 4 kV Switch- gear	Unit 1, Spring '84 Outage Unit 2, Spring '85 Outage	Complete On Schedule
Fire Protection of 125 VDC Control Power and 4 kV bus duct.	Unit 1, Fall '85 Outage Unit 2, Spring '85 Outage	The reverification Analysis has shown that only the protection of the 4 kV bus duct is required. This is on schedule for the Spring 1985 Outage.
Unit 1 RCIC Steam Supply Valve Local Control Capability	Spring 1984 Outage	Complete
RHR Pump Cable Rerouting	Unit 1, Spring '84 Outage Unit 2, Spring '85 Outage	Complete On schedule

Original Modifications

<u>Modification</u>	<u>NRC Commitment</u>	<u>Remarks</u>
Alternate feed to RHR Room Coolers	Unit 1, Fall '85 Outage Unit 2, Spring '85 Outage	On schedule On schedule
RHR Fire Protection	Spring 1985 Outage	On schedule
Safe Shutdown Makeup Pump System	Unit 1, Fall '85 Outage Unit 2, Spring '85 Outage	On schedule On schedule
Suppression & Detection	2-1-85	Complete
DG $\frac{1}{2}$ Cooling Water Pump Isolation Capability	Spring 1985 Outage	On schedule