



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

September 18, 1985

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

Subject: Dresden Station Units 2 & 3
 10 CFR 50 Appendix R
 Revised Exemption Request Report
NRC Docket Nos. 50-237 and 50-249

Reference: B. Rybak letter to H. R. Denton
 dated August 10, 1984.

Dear Mr. Denton:

The referenced letter transmitted Commonwealth Edison's (CECo) 10 CFR 50, Appendix R Reverification Interim Compensatory Measures and Exemption Requests. As noted in the reference, CECo is committed to a continuing evaluation of all the safe shutdown systems and equipment to meet the requirements of Appendix R. Enclosure A to this letter transmits Revision 1 to the Enclosure III of the reference entitled "Appendix R Exemption Requests and Analysis" which incorporates results of these evaluations and all previous Appendix R exemption requests. All technical changes are indicated by revision bars. A summary of the changes is provided in Enclosure B to this letter. CECo requests that these exemptions be granted under the provisions of 10 CFR 50.12.

An additional submittal which covers the structural steel and cold shutdown analyses, as well as any additional exemption requests, will be docketed for your review no later than October 15, 1985. Although we feel our 10CFR50 Appendix R compliance effort is complete, CECo is committed to a continuing evaluation of all the safe shutdown systems and equipment to meet the requirements of Appendix R, Sections III. G, III. J, and III. L. Therefore, future compliance measures or exemptions may be necessary as a result of new plant modifications.

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

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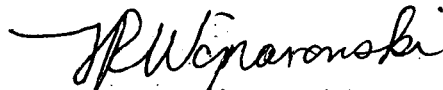
J. G. Keppler

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One signed original and forty (40) copies of this letter are provided for your use. Due to the size and nature of the enclosure, only five (5) copies are provided.

Very truly yours,



J. R. Wojnarowski
Nuclear Licensing Administrator

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Enclosures

cc: R. Gilbert (NRR)
Dresden Resident Inspector

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ENCLOSURE B

SUMMARY OF CHANGES TO ENCLOSURE III OF
AUGUST 10, 1984 SUBMITTAL

| <u>SECTION</u> | <u>CHANGES</u> |
|----------------|--|
| 2.2 | Description of auto blowdown inhibit switch installed in control room. |
| 3.1 | Description of penetrations between Unit 2 reactor building and adjacent fire areas. |
| 3.2 | Penetrations are described in ceiling, west wall and floor of Fire Zone 1.3.2. Description of steam pipe chase barriers. 1-hour fire wrap around power and control cables for inboard isolation condenser valves is described. Discussion of lack of continuity of combustibles between Fire Zone 1.3.2 and adjacent zones. |
| 3.3 | Description of HVAC ducts and unsealed mechanical penetrations in ceiling and floor of Fire Zone 1.1.2.5.A. Description of HVAC ducts between Unit 2 reactor building vent floor and Fire Zones 1.1.2.4 and 1.1.2.5.D. |
| 3.4 | Discussion of unsealed mechanical penetrations between Fire Zone 1.3.2 and the main steam pipe chase. Discussion of unsealed mechanical penetrations in floor and ceiling of Fire Zone 1.3.2. Discussion of unsealed mechanical penetrations and HVAC ducts in floor and ceiling of Fire Zone 1.1.2.5.A. |
| 3.5 | Discussion of HVAC duct in north wall of Fire Zone 1.1.2.3. Discussion of HVAC duct in north wall of Fire Zone 1.1.2.4. Description of mechanical penetration in ceiling of Fire Zone 1.1.2.4. Discussion of inadvertent operation of automatic suppression above switchgear. |

SUMMARY OF CHANGES TO ENCLOSURE III OF
AUGUST 10, 1984 SUBMITTAL (Continued)

| <u>SECTION</u> | <u>CHANGES</u> |
|----------------|--|
| 3.5 | Discussion of HVAC duct in north wall of Fire Zone 1.1.2.5.D. Discussion of mechanical penetration and HVAC ducts in ceiling of Fire Zone 1.1.2.5.A. Discussion of HVAC duct between Fire Zones 11.2.1 and 11.2.3. |
| 3.6 | Description of wide range reactor water level transmitters installed providing separation of divisions. Discussion of lack of fire detection over regenerative and non-regenerative heat exchangers in Fire Zone 1.1.2.3. |
| 4.2 | Discussion of unsealed mechanical penetrations in floor and west wall of Fire Zone 1.4.1. Discussion of HVAC ducts and unsealed mechanical penetrations in floor and ceiling of Fire Zone 1.1.1.5.A. Discussion of HVAC ducts between Unit 3 reactor building vent floor and Fire Zones 1.1.1.4 and 1.1.1.5.D. |
| 4.3 | Clarified description of barriers surrounding Fire Zone 1.4.1. Description of HVAC ducts in floor and ceiling of Fire Zone 1.1.1.5.A. |
| 4.4 | Discussion of lack of fire detection above regenerative and non-regenerative heat exchangers in Fire Zone 1.1.1.3. Description of HVAC duct in north wall of Fire Zones 1.1.1.3, 1.1.1.4 and 1.1.1.5.D. Description of HVAC ducts and unsealed mechanical penetrations in floor of Fire Zone 1.1.1.6. Description of Fire Zone 1.3.1 added to this section. Discussion of inadvertent operation of automatic suppression above switchgear. |
| 4.5 | Discuss of wide range reactor water level transmitters installed to provide separation of divisions. |

SUMMARY OF CHANGES TO ENCLOSURE III OF
AUGUST 10, 1984 SUBMITTAL (Continued)

| <u>SECTION</u> | <u>CHANGES</u> |
|----------------|--|
| 5.2 | <p>All fire barrier descriptions were rewritten to include all walls surrounding a particular fire area and the penetrations in those walls.</p> <p>Discussion of Unit 3 control cables in risers adjacent to Fire Area TB-V.</p> <p>Included Fire Zone 8.1 in Eastern Zone Group (TB-I)</p> |
| 5.3 | <p>Description of riser protection in Fire Zones 8.2.5.A and 8.2.6.A.</p> <p>Description of fire protection in Fire Zone 8.1.</p> <p>Discussion of inadvertent operation of automatic suppression above switchgear.</p> |
| 5.4 | <p>Discussion of inadvertent operation of automatic suppression above switchgear.</p> |
| 6.2 | <p>Justification for physical separation between service water and diesel generator cooling water pumps.</p> |