Commonwealth Edison
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March 12, 1986

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
10 CFR 50.48 and Appendix R
Exemption Requests - Compliance
with Revised 10 CFR 50.12
NRC Docket Nos. 50-237 and 50-249

References (a): Letter from B. Rybak to H. R. Denton dated August 10, 1984.

(b): Letter from J. R. Wojnarowski to H. R. Denton dated September 18, 1985.

(c): Letter from J. R. Wojnarowski to H. R. Denton dated October 16, 1985.

(d): Letter from B. Rybak to H. R. Denton dated March 1, 1985.

(e): Letter from J. R. Wojnarowski to H. R. Denton dated December 4, 1985.

Dear Mr. Denton:

This letter is provided to document compliance of our previously submitted 10 CFR 50.48 and Appendix R Exemption Requests for Dresden Station with the criteria in the recently revised 10 CFR 50.12. The above references represent the technical and schedular exemption requests currently under review by your staff. The following paragraphs identify the "special circumstances" of 10 CFR 50.12(a)(2) applicable to these requests.

TECHNICAL EXEMPTIONS

Enclosure III to Reference (a) transmitted technical exemption requests which resulted from our Appendix R Re-verification effort in response to Generic Letter 83-33. These exemption requests were updated in references (b) and (c). Each requested exemption was supported by a Fire Hazards Analysis which demonstrated that the existing and proposed fire protection features at Dresden satisfy the intent and underlying purpose of Appendix R. This basis for the exemption requests complies with special circumstance 10 CFR 50.12(a)(2)(ii), i.e., "Application of the regulation in the particular circumstance....is not necessary to achieve the underlying purpose of the rule."

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The original criteria to which Dresden was designed substantially pre-dated Appendix R. As a result, many aspects of the plant design do not conform to Appendix R criteria. To achieve literal compliance with Appendix R would require a major re-design effort and extensive modifications to provide additional suppression systems, detection systems and fire barriers beyond those currently being provided. The expenditure of engineering, construction and financial resources to achieve literal compliance would represent an unwarranted burden on Commonwealth Edison and its customers since our current program achieves an equivalent level of protection and complies with the underlying purpose and intent of Appendix R. Therefore, our exemption requests are appropriate and consistent with the criteria in 10 CFR 50.12(2)(2)(ii) and (iii). For specific supporting details, refer to the Fire Hazards Analyses which accompanied our technical exemption requests.

SCHEDULAR EXEMPTIONS

In the reference (d) letter, Commonwealth Edison requested schedular exemption to the requirements of 10 CFR 50.48 for specific modifications. The reference (e) letter supplemented our request by providing an updated schedule. These schedules reflect the original modifications for which we had previously requested schedular exemptions as well as new modifications resulting from our re-verification effort. Both old and new modifications were described in Enclosure II to reference (a), which also documented compensatory measures instituted until the modifications are complete.

Since the issuance of Appendix R, Commonwealth Edison has maintained an aggressive program to ensure that compliance with the applicable requirements is achieved in a thorough and expeditious manner. As described in Enclosure I to reference (a), we made a series of submittals documenting our efforts to comply with the rule which culminated in the issuance of the NRC Safety Evaluation Report in early 1983. However, as a result of industry-wide concerns regarding the proper interpretation of Appendix R requirements, Generic Letter 83-33 was issued to provide clarification. Commonwealth Edison participated in a number of meetings and workshops and in late 1983, initiated a major re-verification effort to assure compliance with the recently clarified intent of Appendix R. This effort resulted in additional modifications and exemption requests, both technical and schedular. It is largely this situation which, in spite of our best efforts, prevented Commonwealth Edison, as well as many other utilities, from achieving compliance with the schedular requirements of 10 CFR 50.48.

We believe the circumstances described above resulted from an industry-wide misunderstanding of the NRC's intent regarding Appendix R and were therefore beyond our direct control. As additional guidance became available, we reacted promptly to re-evaluate our compliance and initiate additional modifications as needed. Our current schedule represents our best effort to complete all required work as soon as possible considering the

extensive scope of work involved. Our commitment to expeditiously achieve compliance is demonstrated by our track record of completing the modifications on schedule and, in some cases, ahead of schedule. As previously stated, interim compensatory measures are in effect for those modifications not yet completed. As such, we feel our requested schedular exemption complies with the criterion in 10 CFR 50.12(a)(21)(v).

In our reference (e) transmittal which updated the modification schedule, we inadvertently omitted some modifications previously included in the schedule. The enclosure to this letter provides an updated schedule for Dresden Station. Changes are indicated by revision bars. The revised completion dates for two Dresden 3 modifications (Attachment A) represent minor adjustments to the schedule and do not affect the adequacy of the interim compensatory measures described in reference (a).

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

One signed original and forty (40) copies of this letter and the enclosure are provided for your use.

Very truly yours,

J. R. Wojnarowski
Nuclear Licensing Administrator

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cc: R. Gilbert - NRR
NRC Resident Inspector - Dresden

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Revision
3-7-86

ATTACHMENT A

Appendix R Fire Protection Modifications

Dresden Station Unit 2

New Modifications

Modification	Completion Date	Remarks
Fire Dampers	Next refueling Outage	
Installation of Fire Doors	9-01-85	Complete
Alternate Feeds to Reactor Pressure and Level Transmitters	Next refueling Outage	Outage related activity. May involve procurement of safety related instrumentation.
Access to Cold Shutdown Motor Operated Valves	6-1-86	Involves installation of galleries in high radiation areas.
HPCI Room Curbs	6-1-86	On schedule
Alternate Access to Iso. Condenser Pipe Pipe Chase	Unit 2-Fall '84 Outage	Complete

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ATTACHMENT A

Appendix R Fire Protection Modifications

Dresden Station Unit 3

New Modifications

Modification	Completion Date	Remarks
Fire Dampers	12-1-86	Unit 3 outage-related activities will be completed during the Fall '85 Outage.
Relocate Local Control Station for MCC	Fall '85 Outage	Outage related activity.
Installation of Fire Doors	9-01-85	Complete
Alternate Feeds to Reactor Pressure and Level Transmitters	Unit 3 - Fall '87 Outage	Outage related activity. May involve procurement of safety related instrumentation.
Access to Cold Shutdown Motor Operated Valves	9-1-86	Involves installation of galleries in high radiation areas.
HPCI Room Curbs	6-1-86	On Schedule
Alternate Access to Iso. Condenser Pipe Pipe Chase	Unit 3-Fall '85 Outage	On Schedule

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ATTACHMENT A

Appendix R Fire Protection Modifications

Dresden Station Unit 2/3

New Modifications

Modification	Completion Date	Remarks
Fire Detection and Suppression	Next Unit 2 refueling Outage	Installation will begin by 9-85.
Fire Barrier Pipe and Conduit Penetration	Next Unit 2 refueling Outage	Will involve access to high radiation areas.
Transfer Switch for DG 2/3 Cooling Water Pump	Next Unit 2 refueling Outage	Outage related activity. Installation of safety related transfer switch.
Emergency Lighting	Next Unit 2 refueling Outage	
Fire Wrap of Conduit	Next Unit 2 refueling Outage	
Curbing in the Cribhouse	8-1-85	Complete

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ATTACHMENT B

Appendix R Fire Protection Modifications

Dresden Station Unit 2

Original Modifications

Modification	NRC Commitment	Remarks
Alternate Feed to Inboard Iso. Condenser Valves	Next Refueling Outage	On Schedule
Access to Outboard Iso. Condenser Valves	Unit 2 - Fall '86 Outage	Complete
Auxiliary Cooling Water Supply to the CRD Pumps	Unit 2 - Fall '84 Outage	Complete
Local Reactor Pressure Indication	Unit 2 - Fall '84 Outage	Complete

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ATTACHMENT B

Appendix R Fire Protection Modifications

Dresden Station Unit 3

Original Modifications

Modification	NRC Commitment	Remarks
Alternate Feed to Inboard Iso. Condenser Valves	Unit 3 - Fall '85 Outage	On Schedule
Access to Outboard Iso. Condenser Valves	Unit 3 - Fall '85 Outage	Complete
Auxiliary Cooling Water Supply to the CRD Pumps	Unit 3 - Fall '85 Outage	Complete
Local Control and Isolation of DG 3 Fuel Oil Transfer Pump	Fall '83 Outage	Complete
Local Reactor Pressure Indication	Unit 3 - Fall '83 Outage	Complete

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ATTACHMENT B

Appendix R Fire Protection Modifications

Dresden Station Units 2/3

Original Modifications

Modification	NRC Commitment	Remarks
Installation of Fire Doors	4-1-84	Complete
CRD Pump Crosstie	Fall '84 Outage	Complete
Service Water Pump Local Control and Isolation	2-1-84	Complete
DG 2/3 Modifications	Next Unit 2 Refueling Outage	Potential need for dual unit outage.
Fire Detection Suppression	1-1-85	Complete