



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

March 20, 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  
Appendix R Exemption Requests -  
Additional Information Regarding  
Revised 10 CFR 50.12  
NRC Docket Nos. 50-237 and 50-249

Reference: Letter from J. R. Wojnarowski to H. R. Denton dated  
March 12, 1986

Dear Mr. Denton:

The referenced letter documented compliance of our Appendix R Exemption Requests with the criteria - the recently revised 10 CFR 50.12. At the request of the Dresden Project Manager, this letter is provided to further describe the the excessive costs which would be associated with a major re-design effort and to provide additional fire protection systems for extensive modifications compliance with Appendix R.

As stated in the referenced letter, achieving literal compliance with Appendix R would require excessive modifications to the plant which are unwarranted considering that the underlying intent of Appendix R has been met. The following items illustrate the scope of work which would be required:

- . Engineering and installation of piping, sprinkler heads and support structures to expand or add suppression systems throughout the Reactor and Turbine buildings.
- . Engineering and installation of additional detection systems.
- . Cost associated with increased surveillance and maintenance on the above new or expanded detection and suppression systems.
- . Potential need for additional fire pump capability to support additional suppression systems.
- . Engineering and installation of additional fire barriers and upgrading of existing barriers.

8603310110 860320  
PDR ADOCK 05000237  
F PDR

A006  
/10

March 20, 1986

- . Potential need for additional ventilation equipment (duct work, dampers) as a result of the above added fire barriers.
- . Substantial rerouting of power cabling and associated conduit, ducts and supports to achieve requested separation.
- . Potential impact on future plant operation, maintenance and modifications due to interference with additional fire barriers (particularly in the vicinity of hatchways) and detection/suppression systems.

The fire hazards analyses submitted in support of our exemption requests demonstrate that existing and planned fire protection features achieve an equivalent level of protection and meet the intent of Appendix R requirements. As such, the financial and human resource expenditure associated with the above work scope is unnecessary and unwarranted.

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

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

Very truly yours,



J. R. Wojnarowski  
Nuclear Licensing Administrator

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

bs/1446K