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May 30, 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/Appendix R Schedular
Exemptions - Revised Interim Measures
NRC Docket Nos. 50-237 and 50-249

Reference (a): Letter from J. R. Wojnarowski to H. R. Denton dated April 18, 1986.

Dear Mr. Denton:

The reference (a) letter provided revised interim compensatory measures in support of our schedular exemption request for Appendix R modifications at Dresden Station Units 2 and 3. At the request of your staff, we are revising the reference (a) submittal as follows:

(1) References to modifications which have been completed or cancelled have been deleted.

(2) References to modifications not explicitly required by Appendix R have been deleted.

(3) References to modifications where no interim measure is required have been deleted.

Our revised Table of Interim Compensatory Measures is enclosed. If you have any additional questions regarding this transmittal, please contact this office.

One signed original and five (5) copies of this transmittal and its attachments are provided for your use.

Very truly yours,

J. R. Wojnarowski
Nuclear Licensing Administrator

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Attachments

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

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TABLE 2

DRESDEN 2&3

INTERIM COMPENSATORY MEASURES

ZONE/AREA	MODIFICATION	INTERIM JUSTIFICATION OR MEASURE
Dresden 2 Reactor Building		
Torus Basement Elev. 476'-6" (1.1.2.1)	1. Provide linear thermal detection along cable trays due to the use of an alternate shutdown method independent of this area. 2. Provide 1-hour protection for the alternate power source to Inboard Isolation Condenser Valves cabling routed through this zone.	1 and 2) These two modifications although in progress, are not yet operational. The linear detection is designed to provide early warning of fire in the area of certain balance of plant cable trays, which are the only significant hazards which could expose the alternate feed to the isolation condenser inboard valves. The wrap of this feed is designed to provide additional assurance of control capability for these valves. The normal feeds for these valves are located on 517'-6" in the vicinity of MCC 28-1. As an interim measure a roving 20-minute fire watch will be maintained for this normal feed area (Reactor Building Elev. 517'-6" in the vicinity of MCC 28-1). This fire watch will be maintained until these two modifications associated with the alternate feed are completed whenever the reactor is in startup or run mode.

TABLE 2

INTERIM COMPENSATORY MEASURES (Cont'd)

ZONE/AREA	MODIFICATION	INTERIM JUSTIFICATION OR MEASURE
Dresden 2 Reactor Building (Cont'd)		
Ground floor Elev. 517'-6" (1.3.2)	1. Provide fire detection throughout Shutdown Cooling Pump room (Area 1.3.2) due to the use of an alternate shutdown method independent of this area. 2. Seal all penetrations to the Shutdown Cooling Pump room (1.3.2) to a 3-hour rating (as described in Section 3.2 of Enclosure III to the September 18, 1985 Revision 1 to the August 10, 1984 exeption request submittal to provide a 3-hour barrier between alternate shutdown methods.	1 and 2) The detection in the shutdown cooling pump room is designed to provide early warning of a fire within the room. The penetration seals are designed to upgrade the walls to a 3-hour rated equivalence. Although these modifications are incomplete, an alternate shutdown path using the HPCI and LPCI systems would be available for a fire in the shutdown cooling pump room. Until these modifcations are completed, a roving 20-minute fire watch will be maintained outside the room as an interim measure whenever the reactor is in startup or run mode. (The entrance door is 3-hour rated and held open by a fusible link.) Since the room is a high radiation area, the fire watch will not physically enter the room, but smoke or fire would be visible from the locked high radiation gate.

TABLE 2

INTERIM COMPENSATORY MEASURES (Cont'd)

ZONE/AREA	MODIFICATION	INTERIM JUSTIFICATION OR MEASURE
Dresden 2 Reactor Building (Cont'd)		
Ground floor Elev. 517'-6" (1.1.2.2)	1. Provide detection throughout fire zone due to the use of an alternate shutdown method independent of this area.	1) A roving 20-minute fire watch will be maintained throughout this area until this modification is complete whenever the reactor is in startup or run mode. This watch will not enter the TIP Room since it is a locked high radiation area with limited access and low combustible loading. Also, the TIP Room contains no components necessary for safe shutdown.
	2. Provide an alternate power feed to the inboard isolation condenser valves (Previously identified in the 1982 Associated Circuits Analysis) Outage mod. This modification will allow reopening of a spuriously closed inboard isolation condenser valve.	2) A roving 20-minute fire watch will be maintained in the vicinity of MCC 28-1 (Elev. 517'-6" reactor building) whenever the reactor is in startup or run mode until this modification is complete. This will provide an adequate interim level of protection for the existing normal feeds for the isolation condenser inboard valves.

TABLE 2

INTERIM COMPENSATORY MEASURES (Cont'd)

ZONE/AREA	MODIFICATION	INTERIM JUSTIFICATION OR MEASURE
Dresden 2 Reactor Building (Cont'd)		
Mezzanine floor Elev. 545'-6" (1.1.2.3, 1.1.2.5.C)	1. Provide fire detection throughout Zone 1.1.2.3 due to the use of an alternate shutdown method independent of this area.	1) A roving 20-minute fire watch will be maintained in this area until these modifications are complete whenever the reactor is in startup or run mode. High radiation areas will not be entered on these rounds due to ALARA concerns. These areas are limited access and have low combustible loading.
	2. Seal all penetrations to the isolation condenser pipe chase (1.1.2.5.C) to provide a 3-hour barrier between alternate shutdown methods.	2) A roving 20-minute fire watch will be maintained outside this pipe chase until this modification is complete whenever the reactor is in startup or run mode. This will provide an adequate interim level of protection by insuring that this barrier is not breached by a fire. This pipe chase is a limited-access high radiation area with low combustible loading.
	3. Reroute pressure and level instrumentation cables to ensure availability of reactor pressure and level indication in the control room for a fire below this elevation.	3) A roving 20-minute fire watch will be maintained in this area until either this modification is complete or the area detection is made operational. This will provide an adequate interim level of protection since multiple local indications are available.

TABLE 2

INTERIM COMPENSATORY MEASURES (Cont'd)

ZONE/AREA	MODIFICATION	INTERIM JUSTIFICATION OR MEASURE
Dresden 2 Reactor Building (Cont'd)		
Main floor Elev. 570'-0" (1.1.2.4, 1.1.2.5.B)	1. Provide detection throughout Zone 1.1.2.4 due to the use of an alternate shutdown method independent of this area.	1) A roving 20-minute fire watch will be maintained in the area until these modifications are complete whenever the reactor is in startup or run mode. This will provide an adequate interim level of protection.
	2. Seal all penetrations to the isolation condenser pipechase (1.1.2.5.B) to provide a 3-hour barrier between alternate shutdown methods.	2) A roving 20-minute fire watch will be maintained outside the pipe chase until this modification is complete whenever the reactor is in startup or run mode. This will provide an adequate interim level of protection by insuring that the barrier is not breached by a fire. This pipe chase is a limited-access high-radiation area with low combustible loading.
	3. Seal all penetrations to the isolation condenser floor Elev. 589'-0" (1.1.2.5.A) except the hatchway and stairs to provide a 3-hour barrier between alternate shutdown methods.	3) See No. 1 above.

TABLE 2

INTERIM COMPENSATORY MEASURES (Cont'd)

ZONE/AREA	MODIFICATION	INTERIM JUSTIFICATION OR MEASURE
Dresden 2 Reactor Building (Cont'd)		
	4. Provide automatic water suppression around the hatchway, stairs, and ladder opening at the ceiling level to provide an equivalent 3-hour barrier between alternate shutdown methods.	4) See No. 1 above.
Isolation Condenser floor Elev. 589'-0" (1.1.2.5.A, 1.1.2.5.D)	1. Provide fire detection throughout Fire Zone 1.1.2.5.A due to the use of an alternate shutdown method independent of this area.	1) A roving 20-minute fire watch will be maintained in these areas until these modifications are complete whenever the reactor is in the startup or run mode. This will provide an adequate interim level of protection.

TABLE 2

INTERIM COMPENSATORY MEASURES (Cont'd)

ZONE/AREA	MODIFICATION	INTERIM JUSTIFICATION OR MEASURE
Dresden 2 Reactor Building (Cont'd)		
	2. Provide automatic water suppression at the ceiling around the hatchway and stairs to provide an equivalent 3-hour barrier between alternate shutdown methods.	2) See No. 1 above.
Southeast Corner Room Elev. 476'-6" (11.2.2)	1. Provide detection throughout zone due to the use of an alternate shutdown method independent of this area.	1) A roving 20-minute fire watch will be maintained in this area until this modification is complete whenever the reactor is in the startup or run mode. This will provide an adequate interim level of protection.
Southwest Corner Room Elev. 476'-6" (11.2.1)	1. Provide detection throughout zone due to the use of an alternate shutdown method independent of this area.	1) A roving 20-minute fire watch will be maintained in the area until the modification is complete whenever the reactor is in the startup or run mode. This will provide an adequate interim level of protection.

TABLE 2

INTERIM COMPENSATORY MEASURES (Cont'd)

ZONE/AREA	MODIFICATION	INTERIM JUSTIFICATION OR MEASURE
Dresden 3 Reactor Building		
Torus Basement Elev. 476'-6" (1.1.1.1)	1. Provide linear thermal detection along cable trays due to the use of an alternate shutdown method independent of this area. 2. Provide 1-hour protection for the alternate power source to the inboard isolation conser valves cabling routed through this zone.	1 and 2) These two modifications methods are not yet operational. The linear detection is designed to provide early warning of fire in the area of certain balance-of-plant cable tray which are the only sufficient hazard which could expose the alternate feed to the isolation condencer inboard valves. The wrap of this feed is designed to provide additional assurance of control capability for the valves. The normal feeds for the valves are located on Elev. 517'-6" in the area of MCC 38-1. As an interim compensatory measure, a roving 20-minute fire watch will be maintained for the normal feed area (Reactor building Elev. 517'-6" in the vicinity of MCC 38-1) until these two modifications associated with the alternate feeds are completed whenever the reactor is in startup or run mode.

TABLE 2

INTERIM COMPENSATORY MEASURES (Cont'd)

ZONE/AREA	MODIFICATION	INTERIM JUSTIFICATION OR MEASURE
Dresden 3 Reactor Building (Cont'd)		
Ground floor Elev. 517'-6" (1.4.1)	1. Provide detection throughout area 1.4.1 due to the use of an alternate shutdown method independent of this area.	1) The detection in the TIP Room is designed to provide early warning or a fire within the room. The penetration seals are designed to upgrade the walls to a 3-hour rated equivalence. Although these modifications are incomplete, an alternate shutdown path using the HPCI system would be available. Until these modifications are completed, a roving 20-minute fire watch will be maintained outside the room as an interim measure whenever the reactor is in startup or run mode. This will provide an adequate interim level of protection by insuring that a fire is detected before it breaches the barrier to the extent that it could damage alternative safe shutdown components. The TIP Room is a high radiation area with limited access and low combustible loading.
	2. Seal all penetrations to the TIP room (1.4.1) to a 3-hour rating to provide a 3-hour barrier between alternate shutdown methods.	2) See No. 1 above.

TABLE 2

INTERIM COMPENSATORY MEASURES (Cont'd)

ZONE/AREA	MODIFICATION	INTERIM JUSTIFICATION OR MEASURE
Dresden 3 Reactor Building (Cont'd)		
Ground Floor Elev. 517'-6" (1.1.1.2)	1. Provide detection throughout zone due to the use of an alternate shutdown method independent of this area.	1) A roving 20-minute fire watch will be maintained through the area until this modification is complete whenever the reactor is in startup ro run mode. This watch will not enter the shtudown cooling pump room or TIP Room since they are high radiation limited-access areas with low combustible loading and alternative independent methods of shutdown are available.
	2. Seal openings to Unit 2 Reactor Building to a 3-hour rating to provide a 3-hour barrier between reactor buildings.	2) See No. 1 above.

TABLE 2

INTERIM COMPENSATORY MEASURES (Cont'd)

ZONE/AREA	MODIFICATION	INTERIM JUSTIFICATION OR MEASURE
Dresden 3 Reactor Building (Cont'd)		
	3. Provide an alternate power feed to the inboard isolation condenser valves (Previously identified in 1982 Associated Circuits Report) OUTAGE MOD. This will enable reopening of a spuriously closed normally open inboard isolation condenser valve.	3) A roving 20-minute fire watch will be maintained in the vicinity of MCC 38-1 whenever the reactor is in the startup or run mode. This will provide an adequate interim level of protection by assuring operability of the normal power feeds. The TIP Room will not be entered by this patrol since it is a high radiation limited-access area with low combustible loading and alternate safe shutdown components would not be affected by loss of the TIP Room. If a fire where to escape the TIP Room, it would be discovered by the fire watch in the adjacent area prior to it causing significant damage.

TABLE 2

INTERIM COMPENSATORY MEASURES (Cont'd)

ZONE/AREA	MODIFICATION	INTERIM JUSTIFICATION OR MEASURE
Dresden 3 Reactor Building (Cont'd)		
Mezzanine floor Elev. 545'-6" (1.1.1.3, 1.1.1.5.C)	1. Provide detection throughout Zone 1.1.1.3 due to the use of an alternate shutdown method independent of this area.	1) A roving 20-minute fire watch will be maintained in the accessible areas of this floor until these modifications are complete whenever the reactor is in startup or run mode. High radiation areas will not be entered by this patrol due to their low combustible loading and since these areas either do not affect safe shutdown or alternative safe shutdown components would not be affected by loss of area in question.
	2. Seal all penetrations to the isolation condenser pipe chase (1.1.1.5.C) to provide a 3-hour barrier between alternate shutdown methods.	2) A roving 20-minute fire watch will be maintained outside this pipe chase until this modification is complete whenever the reactor is the startup or run mode. This will provide an adequate interim level of protection by insuring the fire barrier is not breached by a fire. This pipe chase is a limited-access high radiation area with low combustible loading.
	3. Seal all penetrations to Unit 2 Reactor Building (Zone 1.1.2.3) to provide a 3-hour barrier between reactor buildings.	3) See No. 1 above.

TABLE 2

INTERIM COMPENSATORY MEASURES (Cont'd)

ZONE/AREA	MODIFICATION	INTERIM JUSTIFICATION OR MEASURE
Dresden 3 Reactor Building (Cont'd)		
	4. Reroute pressure and level cables to ensure availability of reactor pressure and level indication in the control room for a fire below this elevation.	4) A roving 20-minute fire watch will be maintained in this area until either this modification is complete or the associated area detection is made operational. This will provide an adequate interim level protection since multiple local indications are avilable.
Main floor Elev. 570'-0" (1.1.1.4, 1.1.1.5.B)	1. Provide detection throughout Zone 1.1.1.4 due to the use of an alternate shutdown method independent of this area.	1) A roving 20-minute fire watch will be maintained in this area until these modifications are complete whenever the reactor is in startup or run mode. These will provide an adequate interim level of protection.
	2. Seal all penetrations to the isolation condenser pipe chase (1.1.1.5.B) to provide a 3-hour barrier between alternate shutdown methods.	2) A roving 20-minute fire watch will be maintained outside this area until this modification is complete whenever the reactor is in startup or run mode. This will provide an adequate interim level of protection of insuring that the fire barrier is not breached by a fire. This pipe chase is a limited-access high radiation area with low combustible loading.

TABLE 2

INTERIM COMPENSATORY MEASURES (Cont'd)

ZONE/AREA	MODIFICATION	INTERIM JUSTIFICATION OR MEASURE
Dresden 3 Reactor Building (Cont'd)		
	3. Seal all penetrations to the isolation condenser floor Elev. 589'-0" (1.1.1.5.A) except the hatchway and ladder to provide a 3-hour barrier between alternate shutdown paths.	3) See No. 1 above.
	4. Provide automatic water suppression around the hatchway and ladder opening at the ceiling to provide an equivalent 3-hour barrier between alternate shutdown paths.	4) See No. 1 above.

TABLE 2

INTERIM COMPENSATORY MEASURES (Cont'd)

ZONE/AREA	MODIFICATION	INTERIM JUSTIFICATION OR MEASURE
Dresden 3 Reactor Building (Cont'd)		
Isolation Condenser floor Elev. 589'-0" (1.1.1.5.A, 1.1.1.5.D)	1. Provide detection throughout Zone 1.1.1.5.A due to the use of an alternate shutdown method independent of this area.	1) A roving 20-minute fire watch will be maintained in these areas until these modifications are complete whenever the reactor is in the startup or run mode. This will provide an adequate interim level of protection.
	2. Provide automatic suppression for the hatchway at the ceiling level to provide an equivalent 3-hour barrier between alternate shutdown methods.	2) See No. 1 above.
Southwest Corner Room Elev. 476'-6" (11.1.1)	1. Provide detection throughout zone due to the use of an alternate shutdown method independent of this area.	1) A roving 20-minute fire watch will be maintained in this area until this modification is complete whenever the reactor is in the startup or run mode. This will provide an adequate interim level of proteciton.
Southeast Corner Room Elev. 476'-6" (11.1.2)	1. Provide detection throughout zone due to the use of an alternate shutdown method independent of this area.	1) A roving 20-minute fire watch will be maintained in this area until this modidication is complete whenever the reactor is in the startup run mode. This will provide an adequate interim level of protection.

TABLE 2

INTERIM COMPENSATORY MEASURES (Cont'd)

ZONE/AREA	MODIFICATION	INTERIM JUSTIFICATION OR MEASURE
Dresden 2&3 Turbine Building		
Ground floor Elev. 517'-6" (8.2.5.C, 8.2.5.E)	1. Provide a one-hour fire resistive enclosure for a cable riser containing safe shutdown required components in the Unit 2 turbine building trackway outside the auxiliary electric equipment room (AEER).	1) A roving 20-minute fire watch will be provided in this area (by the cable riser outside the AEER) until this modification is complete whenever either Unit 2 or Unit 3 is in startup or run mode. This will provide an adequate interim level of protection.
Dresden 2&3 Cribhouse		
Cribhouse (11.3)	1. Provide detection throughout the lower elevation to provide equivalent Appendix R separation for redundant service water pump and Diesel Generator (DG) 2/3 cooling water pump cabling.	1) A roving 20-minute fire watch will be maintained until this modification is completed, whenever Unit 2 or Unit 3 is in the startup or run mode.
	2. Provide suppression for upper Elevations 517'-6" and 509'-6" to provide equivalent Appendix R separation for redundant service water pumps and associated cables.	2) Until this modification is completed, a roving 20-minute fire watch will be maintained in the cribhouse area whenever Unit 2 or Unit 3 is in startup or run mode. This will provide an adequate interim level of protection.