

MAY 9 1973

Docket Nos 50-10, 50-237,
and 50-249

Commonwealth Edison Company
ATTN: Mr. L. D. Butterfield, Jr.
Nuclear Licensing Administrator
Post Office Box 767
Chicago, Illinois 60690

Gentlemen:

In our evaluation of your response dated October 13, 1972, to our letter dated August 3, 1972, regarding flooding of critical equipment, it has become apparent that additional information is required before we can continue our review. The additional information should provide assurance that the plants do or will meet the guidelines set forth in the enclosed Attachment A. Some information addressing the guidelines has been included in your October 13, 1972 letter and may be incorporated by reference where appropriate.

If your analysis identifies systems or components that require additional changes in your plant to meet the guidelines, submit the results of your safety analysis regarding the changes, a description of the required changes (including appropriate drawings and sketches), and schedule for completion of the changes. Where temporary protective measures are to be taken to protect equipment or systems important to safety, submit your analysis, description, and justification for these measures and your installation and test schedule. Also describe and discuss the status of investigations and modifications reported to be in progress in your October 13, 1972 letter.

Your response for temporary protective measures should be submitted as soon as practicable but in not more than 30 days. Other information requested above should be submitted within 60 days. It is expected

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that all required corrections will be performed as expeditiously as is practicable.

One signed original and thirty-nine additional copies of your submittals are required.

Sincerely,

Original signed by
Dennis L. Ziemann

Dennis L. Ziemann, Chief
Operating Reactors Branch #2
Directorate of Licensing

Enclosure:
Attachment A - Guidelines

cc w/enclosure:
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ATTACHMENT A

GUIDELINES FOR PROTECTION FROM FLOODING OF EQUIPMENT IMPORTANT TO SAFETY

Responses should provide assurance that the plants do or will meet the following guidelines:

1. Separation for redundancy - single failures of non-Class I system components or pipes shall not result in loss of a system important to safety. Redundant safety equipment shall be separated and protected to assure operability in the event a non-Class I system or component fails.
2. Access doors and alarms - watertight barriers for protection from flooding of equipment important to safety shall have all access doors or hatches fitted with reliable switches and circuits that provide an alarm in the control room when the access is open.
3. Sealed water passages - passages or piping and other penetrations through walls of a room containing equipment important to safety shall be sealed against water leakage from any postulated failure of non-Class I water systems. The seals shall be designed for the SSE, including seismically induced wave action of water inside the affected compartment during the SSE.
4. Class I watertight structures - walls, doors, panels, or other compartment closures designed to protect equipment important to safety from damage due to flooding from a non-Class I system rupture shall be designed for the SSE, including seismically induced wave action of water inside the affected compartment during the SSE.
5. Water level alarms and trips - rooms containing non-Class I system components and pipes whose rupture could result in flood damage to equipment important to safety shall have level alarms and pump trips (where necessary) that alarm in the control room and limit flooding to within the design flood volume. Redundancy of switches is required. Critical pump (i.e., high volume flow, such as condenser circulating water pumps) trip circuits should meet IEEE 279 criteria.

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6. Class I equipment should be located or protected such that rupture of a non-Class I system connected to a tower containing water or body of water (river, lake, etc.) will not result in failure of the equipment from flooding.
7. The safety analysis shall consider simultaneous loss of offsite power with the rupture of a non-Class I system component or pipe.

The responses should include a listing of the non-Class I systems considered in the analysis. These should include at least the following systems:

Firewater	Demineralized Water
Service water	Drains
Condensate	Heating boiler condensate
Feedwater	Condenser circulating water
Reactor Building Cooling Water	Makeup
Turbine Building Cooling Water	Potable water

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