

ATTACHMENT TO LICENSEE EVENT REPORT 80-035/03X-1
COMMONWEALTH EDISON COMPANY (CWE)
DRESDEN UNIT 2 (ILDRS 2)
DOCKET # 050-237

During an audit by an offsite Commonwealth Edison Quality Assurance Inspector, it was discovered that the three Control Room and Computer Room smoke detectors listed in Technical Specification Table 3.12-1 had been removed from service for thirteen months without submitting the thirty day report to the NRC as required by Technical Specification 3.12.A.2.b. When the reporting requirement was realized, a deviation report was immediately written and an LER was submitted as required within thirty days.

The three smoke detectors were permanently removed from existing ventilation ducts as part of the fire suppression, ventilation, and fire detection modifications to substantially upgrade the station's fire protection system. These three detectors were replaced by forty nine new instruments to detect a fire in these areas. The Dresden Fire Marshal had reviewed the new modifications and the need to eliminate the three originally installed smoke detectors. His review determined that smoke in either area would be promptly discovered by Control Room personnel because both rooms share a common air conditioning and air recirculation system. The Control Room is continuously occupied, and thus a fire inspection was provided as required by Technical Specification 3.1.2.A.2.a for operation with inoperable smoke detectors. The Fire Marshal overlooked the reporting requirements of Technical Specification 3.12.A.2.b., however. Further, his periodic review of the overdue surveillance for these three detectors, as indicated on the monthly computerized surveillance schedule, did not prompt him to remember the reporting requirement since he felt that all necessary actions had been completed. Thus, the detectors remained out-of-service without the required report having been made.

In addition to submitting the thirty day report to the NRC as a result of the Quality Assurance audit finding, since the installation of the new smoke detectors was nearing completion, the Fire Marshal prepared an expedited testing program for them and they were declared operable within thirty days.

Proposed Technical Specification changes have been submitted to the NRC to reflect the installation of the new smoke detectors, and no further corrective action is necessary