



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20545

December 11, 1987

Docket Nos. 50-254  
and 50-265

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

Dear Mr. Butterfield:

SUBJECT: SAFETY EVALUATION FOR EXEMPTIONS FROM THE FIRE PROTECTION  
REQUIREMENTS OF 10 CFR 50, APPENDIX R, SECTION III.G  
(TAC NOS. 57282, 57283, 61291, 61292, 62024, 62025, 63556, AND 63557)

In response to NRC staff positions on 10 CFR 50, Appendix R prescribed by Generic Letter (GL) 83-33, dated October 19, 1983, Commonwealth Edison Company (CECo, the licensee) conducted an independent reevaluation of the Quad Cities Nuclear Power Station (QCNP) fire protection program. Subsequently, by letter dated December 18, 1984, CECo submitted the results of their Appendix R reevaluation efforts which included certain technical exemption requests from the fire protection requirements of Appendix R, Section III.G, associated fire hazards analysis, and detailed descriptions of interim compensatory measures (ICMs) in effect at QCNP (until plant modifications to comply with Appendix R are completed). Since this original submittal, based upon further staff guidance (i.e. G: 86-10 and IEM 86-25) and continued self-evaluations, CECo has submitted several more letters dated December 4, 1985, June 25, 1986, July 22, 1986, September 30, 1987, October 1, 1987, and November 23, 1987 which requested additional exemptions, modification of previous exemption requests, and withdrawal of others. During staff review of all Appendix R related submittals, several site visits were conducted (on September 9, 1987, February 23, 1987, and October 28, 1987) to walk down plant specific configurations and confer with QCNP personnel.

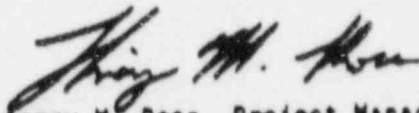
Enclosure 1 contains the staff's Safety Evaluation (SE) of all Appendix R exemption requests contained in the aforementioned CECo submittals except those dated, since and including, September 30, 1987. Another SE will be issued at a later date which will encompass the remaining requests for exemption from the Appendix R fire protection requirements of Section III.G received to date. Concurrent with this later SE, a formal regulatory "Exemption" will be issued to CECo and published in the Federal Register by separate correspondence. The subject of ICMs has already been addressed in NRC letter dated December 1, 1987.

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In addition to the technical exemptions mentioned above, CECO has requested scheduler exemptions from the provisions of 10 CFR 50.48 for various incomplete plant modifications required by Appendix R. By letter dated December 4, 1987, CECO provided a comprehensive list of referenced letters which detailed the chronology of their submittals requesting scheduler exemptions for QChPS from 10 CFR 50.48, including related status updates on completion of Appendix R modifications. To date, all plant modifications required to comply with Appendix R (except for technical exemptions that were granted or are pending) have been completed, with only two exceptions. As such, excluding emergency lighting and RCIC valve related modifications, scheduler exemptions from 10 CFR 50.48 are no longer necessary. Consequently, the staff considers the status of these scheduler exemption requests to be moot, and does not plan any further review effort. The two outstanding modifications will be addressed at some later date.

With regard to a letter dated April 9, 1987, CECO requested NRC staff approval to replace the foam water spray system, used to protect recirculation pump motor generator (MG) sets, with a standard water spray system. Additionally, this letter highlighted a previous modification in the associated fire detection system which resulted in installation of compensation type thermostats vice flame or infrared detectors. The staff recognizes this plant alteration of fire protection features for the recirculation pump MG sets and finds them acceptable.



Thierry M. Ross, Project Manager  
Project Directorate III-2  
Division of Reactor Projects - III, IV,  
V, and Special Projects

Enclosures:  
Safety Evaluation

cc w/enclosures:  
see attached list