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April 28, 1989

Dr. T.E. Murley
ATTN: DOCUMENT CONTROL DESK
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Subject: LaSalle County Station Units 1 and 2
Response to Inspection Report Nos.
50-373/87027 and 50-374/87026
Fire Brigade Response Time
NRC Docket Nos. 50-373 and 50-374

References (a): Letter dated September 11, 1987 from J.J.
Harrison to Cordell Reed.

(b): Letter dated October 13, 1987 from L.D.
Butterfield to A.B. Davis.

(c): Letter dated March 15, 1989 from H.J. Miller
to Cordell Reed.

Dear Dr. Murley:

This letter is in response to the inspection conducted by Mr. J.M. Ulie on July 13-15, August 10-11 and September 8, 1987, of activities at LaSalle County Station Units 1 and 2. Reference (a) indicated that certain activities appeared to be in noncompliance with NRC requirements.

Reference (b) documented Commonwealth Edison's position that a violation was not warranted. Subsequently, the issue was referred to NRC headquarters for review. At the completion of that review (Reference (c)), it was concluded that a violation of NRC requirements did occur.

On April 13, 1989, Commonwealth Edison met with NRR and Region III personnel at NRC headquarters to discuss resolution of the issue. It was resolved that in response to the Notice of Violation, Commonwealth Edison was to perform an evaluation to identify areas at LaSalle County Station which

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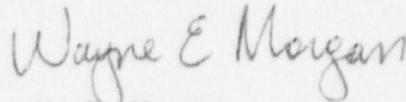
April 28, 1989

would require immediate assembly of the station fire brigade upon receipt of a fire alarm in the control room. This action is to be done on an interim basis until a more in-depth analysis is completed, reviewed, and approved by the NRC. The following Attachment provides this evaluation.

On April 14, 1989, Mr. Ron Gardner of your staff was contacted and concurred with an extension of the response until April 28, 1989.

If you have any further questions regarding this matter, please direct them to this office.

Very truly yours,



W. E. Morgan
Nuclear Licensing Administrator

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Attachment

cc: NRC Resident Inspector - LSCS
P.C. Shemanski - Project Manager, NRR
D. Kubicki - NRR

ATTACHMENT

LASALLE COUNTY STATION FIRE BRIGADE ASSEMBLY INTERIM EVALUATION

A. PURPOSE

The purpose of this evaluation is to determine which areas at LaSalle County Station will require immediate assembly of the fire brigade upon receipt of a fire alarm in the control room, on an interim basis, until a more in depth analysis is completed.

B. REFERENCES

1. 10 CFR 50, Appendix R.
2. July 20, 1988 letter from G. H. Holahan (NRR) to H. J. Miller (NRC Region III) concerning request for technical assistance-clarification of NRC position covering timeliness of fire brigade response.
3. LaSalle Fire Protection Documentation Package:
 - a. UFSAR
 - b. FHA
 - c. Safe Shutdown Report
 - d. Safety Evaluation Reports (Original and Supplements)
4. The November 3, 1981 letter from L. O. DelGeorge to A. Schwencer.

C. CRITERIA

The following set of criteria was used and agreed upon to determine which areas require immediate assembly of the fire brigade upon receipt of a fire alarm in the control room:

1. Redundant trains of safe shutdown equipment are contained within the same area, and
2. The fire loading in the area is sufficient to threaten safe shutdown equipment, considering both quantity and location of combustibles, and
3. The fire protection in the area does not meet the separation criteria of Appendix R, Section III.G.2, and
4. The exemption or deviation applicable to the area took credit for prompt response of the fire brigade.

D. METHODOLOGY

1. In order for an area to require immediate assembly of the fire brigade upon receipt of a fire alarm in the control room, all four of the evaluation criteria must apply to the area being evaluated, therefore:
 - a. Only those areas in which redundant trains of safe shutdown equipment are continued have been included in this evaluation.
 - (1) Delayed fire brigade response in all other plant areas is not considered significant from a fire protection standpoint. At most, only one safe shutdown division would be vulnerable. Therefore, permitting a plant operator to respond first to an alarm in these areas is acceptable.
 - b. Fire zones that have been divided into subzones separating redundant trains of safe shutdown equipment with 3-hour fire rated barriers were not evaluated (4D1, 4E1, 4E2, 4E3, and 4E4). Delayed fire brigade response in these plant areas are not considered significant from a fire protection standpoint. At most, only one safe shutdown division would be vulnerable. Therefore, permitting a plant operator to respond first to an alarm in these areas is acceptable.
2. Credit has been taken for previous analyses and evaluations performed in the documents referenced in section B.3 of this report. All areas that contain significant fire hazards, regardless of whether or not they represent a threat to safe shutdown capability, have been previously analyzed and protected accordingly.

CONCLUSIONS

No areas at LaSalle met all of the criteria of Paragraph C.

However, extending beyond the criteria of this evaluation, conditions may exist (ie. equipment availability, placement of temporary combustibles etc...) when a delay in fire brigade response in some of the areas evaluated in this report could have a detrimental affect on safe shutdown capability. During such conditions redundant trains of safe shutdown equipment may become vulnerable to a single fire. The areas where these conditions are the most significant are:

1. Fire Zone 5C11

If the pre-action sprinkler system protecting the divisional cable trays in the Diesel Generator Corridors and/or the fire protection barrier applied to the redundant cable tray was inoperable/OOS, the configuration of the combustibles (cables) is such that the redundant safe shutdown cables may become vulnerable to a single fire.

CORRECTIVE ACTIONS

In the interim, LaSalle County Station has developed an administrative operating order to require immediate assembly of the fire brigade for a fire alarm received in the control room for fire detection zones 1-25, V-0-1-25, 1-4, 2-25, V-0-2-25 and 2-4 (Fire Zone 5C11), or a D. G. Corridor pre-action sprinkler system actuated alarm, when either Unit is running.

An in-depth analysis (the in-depth analysis will consider, for example, equipment availability, combustible fire loading and plant status) will be performed and submitted to the NRC by July 3, 1989.

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