

Commonwealth Edison Company
Quad Cities Generating Station
22710 206th Avenue North
Cordova, IL 61242-9740
Tel 309-654-2241



June 2, 2000

SVP-00-089

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555

Quad Cities Nuclear Power Station, Units 1 and 2
Facility Operating License Nos. DPR-29 and DPR-30
NRC Docket Nos. 50-254 and 50-265

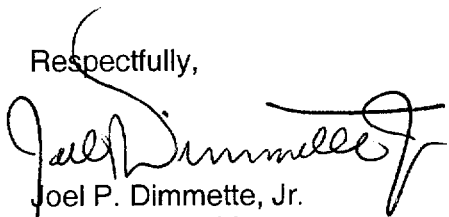
Subject: Title 10 CFR 50, Appendix R Exemptions

Reference: Letter from G. R. Horn (Nebraska Public Power District) to USNRC,
"Fire Protection Program Commitment Revision," dated
December 16, 1994.

The purpose of this letter is to formally request withdrawal of certain exemptions to 10 CFR 50, Appendix R, "Fire Protection Program for Nuclear Power Facilities Operating Prior to January 1, 1979." As part of our Appendix R Optimization Project, Commonwealth Edison (ComEd) Company has identified a number of exemptions that are no longer required to support post fire safe shutdown activities at Quad Cities Nuclear Power Station. This reduced reliance on Appendix R exemptions has been accomplished through a combination of plant modifications and technical evaluations. A description of each exemption, as well as a summary of our justification is provided in the attachment. It is expected that ongoing project activities will result in further reductions. A second withdrawal submittal is expected by July 31, 2000. Please note that the Cooper Nuclear Power Station submitted a similar withdrawal letter in December of 1994 (see Reference).

Should you have any questions concerning this letter, please contact
Mr. C.C. Peterson at (309) 654-2241, extension 3609.

Respectfully,


Joel P. Dimmette, Jr.
Site Vice President
Quad Cities Nuclear Power Station

A006

Attachment: Quad Cities Exemptions To 10 CFR 50, Appendix R

cc: Regional Administrator – NRC Region III
NRC Senior Resident Inspector – Quad Cities Nuclear Power Station

Exemption Title

Justification For Removal Of Control Power To Defeat High Impedance Faults
(Quad Cities Fire Protection Report, Volume 4, Section 9.1)

Key References

ComEd Submittal Date: January 12, 1987
NRC Safety Evaluation Date: April 20, 1988

Statement of Exemption Granted

This exemption to Appendix R, Section III.G.1 was requested to address actions taken to mitigate high impedance faults on non-safe shutdown equipment. The action involved manually tripping non-essential loads and removing associated control power. The 125 Vdc control power is removed from the affected breakers to prevent subsequent spurious closure. The act of removing the control power fuses is considered a hot shutdown repair for the purposes of Appendix R.

Basis for Exemption Withdrawal

Quad Cities has performed a technical evaluation of the control power disconnects at the 4kV and 480V switchgear. To protect essential safe shutdown equipment, control power may be removed from non-essential loads by pulling these switches which require no special tools or personnel protective measures. Quad Cities has determined that this manual action is not a hot shutdown repair. For this reason, we are in compliance with the requirements of 10 CFR 50, Appendix R and associated implementing guidance. Therefore, the subject exemption is no longer required.

Exemption Title

Justification For Fuse Pulling To Preclude Operation Of The Reactor Relief Valves
(Quad Cities Fire Protection Report, Volume 4, Section 12.2)

Key References

ComEd Submittal Date: October 1, 1987
NRC Safety Evaluation Date: April 20, 1988

Statement of Exemption Granted

This exemption to Appendix R, Section III.G.1 was requested to address actions taken to mitigate the potential for spurious operation of the reactor relief valves. In order to prevent spurious operation of the reactor relief valves, the motive power to the relief valve circuits must be de-energized. This was accomplished by pulling fuses. Pulling fuses is considered a hot shutdown repair for the purposes of Appendix R.

Basis for Exemption Withdrawal

The current Safe Shutdown Analysis addresses the potential for spurious operation of the reactor relief valves. A design change has been completed that adds a disconnect switch that may be used to interrupt power to the reactor relief valves, precluding the need to remove fuses. For this reason, we are in compliance with the requirements of 10 CFR 50, Appendix R and associated implementing guidance. Therefore, the subject exemption is no longer required.

Exemption Title

Justification For Lack Of Emergency Lighting For Suppression Pool Level Instrumentation
(Quad Cities Fire Protection Report, Volume 4, Section 11.3)

Key References

ComEd Submittal Date: October 1, 1987
NRC Safety Evaluation Date: February 25, 1991

Statement of Exemption Granted

This exemption to Appendix R, Section III.J, was originally requested due to a lack of emergency lighting near the local torus level instrumentation. These instruments are located in the Unit 1 and Unit 2 reactor buildings and are utilized as safe shutdown equipment.

Basis for Exemption Withdrawal

Emergency lighting has been installed that meets the requirements of Appendix R. For these reasons, we are in compliance with the requirements of 10 CFR 50, Appendix R and associated implementing guidance. Therefore, the subject exemption is no longer required.

Exemption Title - (HISTORICAL)

Exemption to Appendix R Section III.G.3 For Suppression In The Vicinity Of
Electrical Equipment
(Quad Cities Fire Protection Report, Volume 4, Section 1.0)

Key References

ComEd Submittal Date: July 1, 1982
NRC Safety Evaluation Date: June 23, 1983

Statement of Exemption Granted

This exemption to Appendix R, Section III.G.3, to the extent that it requires the installation of automatic fire detection systems and fixed fire suppression in an area room or zone for which alternate shutdown capability is provided.

Basis for Exemption Withdrawal

Subsequent to the issuance of the NRC Safety Evaluation for this exemption, the NRC issued clarifying guidance for the implementation of Appendix R requirements. Of particular importance was the issuance of Generic Letter (GL) 83-33, "NRC Positions On Certain Requirements of Appendix R to 10 CFR 50." Comparison of the criteria contained in GL 83-33 against the basis for the original Quad Cities Appendix R analyses prompted ComEd to perform a complete re-validation of the Appendix R program at Quad Cities. This rebaselining effort lead to a significant revision to the Appendix R program, including requests for Appendix R exemptions as appropriate. This exemption was superceded by exemption requests resulting from the re-validation efforts. Therefore, the subject exemption is no longer required.

Exemption Title (HISTORICAL)

Exemption to Appendix R Section III.G.2 For Three Hour Fire Barriers in Fire Zone 1.1.1.1 of Unit 1 and 1.1.2.1 of Unit 2
(Quad Cities Fire Protection Report, Volume 4, Section 1.0)

Key References

ComEd Submittal Date: July 1, 1982
NRC Safety Evaluation Date: June 23, 1983

Statement of Exemption Granted

This exemption to Appendix R, Section III.G.2, pertains to redundant safe shutdown equipment in fire zones 1.1.1.1 for Unit 1 and 1.1.2.1 for Unit 2.

Basis for Exemption Withdrawal

Subsequent to the issuance of the NRC Safety Evaluation for this exemption, the NRC issued clarifying guidance for the implementation of Appendix R requirements. Of particular importance was the issuance of Generic Letter (GL) 83-33, "NRC Positions On Certain Requirements of Appendix R to 10 CFR 50." Comparison of the criteria contained in GL 83-33 against the basis for the original Quad Cities Appendix R analyses prompted ComEd to perform a complete re-validation of the Appendix R program at Quad Cities. This rebaselining effort lead to a significant revision to the Appendix R program, including requests for Appendix R exemptions as appropriate. This exemption was superceded by exemption requests resulting from the re-validation efforts. Therefore, the subject exemption is no longer required.