



**Commonwealth Edison**

One First National Plaza, Chicago, Illinois  
Address Reply to: Post Office Box 767  
Chicago, Illinois 60690

December 13, 1983

Mr. James G. Keppler  
Regional Administrator  
U.S. Nuclear Regulatory Commission  
Region III  
799 Roosevelt Road  
Glen Ellyn, IL 60137

Subject: LaSalle County Station Unit 1  
Fire Protection Commitments for  
Power Operation  
NRC Docket No. 50-373

- References (a): NRC Inspection Report Nos.  
50-373/83-44 and 50-374/83-48  
dated December 12, 1983.
- (b): C. W. Schroeder letter to J. G. Keppler  
dated December 2, 1983: 10 CFR 50.55(e)  
83-07.
- (c): C. W. Schroeder letter to H. R. Denton  
dated November 23, 1983: LaSalle  
County Station Unit 2 Fire Protection.

Dear Mr. Keppler:

Reference (a) states:

"In the November 18, 1983, meeting the Region also discussed with the licensee those findings which were of concern in relation to Unit 1 re-start: water suppression system capability (including acceptability of the service water system as a back-up), fire protection system design, and trained fire watches. The licensee agreed that prior to Unit 1 start-up they will submit a letter to the Region describing compensatory measures that they will take to assure safe operation of Unit 1 until final resolution and action is completed, with the exception of trained fire watches which they do not believe is a requirement, and for which they were not prepared to make a commitment. The need for trained fire watches will be referred by the Region to NRR for resolution."

The purpose of this letter is to fulfill the commitment to provide in writing the interim compensatory measures that Commonwealth Edison Company agreed to during the November 18, 1983 meeting with the NRC.

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As reported in reference (b) the preliminary judgement of the Fire Water System at LaSalle is that the water system is adequate until the first refuel outage but the existing design margins may not be available. In order to address the concern in regards to the margins of the Fire Water System raised by the Region III inspectors on November 18, the following commitments were agreed upon to ensure that adequate compensatory measures would be in place to minimize the actual challenges to the Fire Water Systems in two (2) areas.

- A. On the Refuel Floor a continuous Fire Watch will be posted. The post order will include responsibilities for:
  - 1. Patrol
  - 2. Notification
  - 3. Checks to ensure that a Fire Watch with "Live Fire Training" is present during welding, cutting, or grinding on the Refuel floor.
- B. At the Cable Spreading Rooms one continuous Fire Watch will be posted. The post orders will include responsibilities for:
  - 1. Notification
  - 2. Checks to ensure that a Fire Watch with "Live Fire Training" is present during welding, cutting or grinding in the Cable Spreading Rooms
  - 3. It should be noted that the November 18 verbal commitment included the requirement to have fire hoses rolled out at the Cable Spreading Rooms but subsequent communications between J. Ulle of Region III and the LaSalle Fire Marshall determined this was not required.

In order to address the concern of Fire Detector locations, an additional commitment was made as follows:

- C. A Roving Fire Watch will be established in the Safety Related unmanned portions of the Unit 1 and Unit 2 Auxiliary Buildings. The post orders will include:
  - 1. Areas to patrol
  - 2. Notification

In relation to the request to require all Fire Watches required by NFPA 51B to be trained on "Live Fires" no commitment was made in the November 18 meeting other than to address the issue in writing prior to start-up of Unit 1. Subsequent to November 18, Mr. C. Reed, et al of

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Commonwealth Edison attended a meeting with Messrs. D. Eisenhut, et al, of NRR and C. E. Norelius, et al, of Region III at which Commonwealth Edison was informed that the subject of Fire Watch Training would not be required to be resolved prior to Unit 1 restart but would be a 5% power License Condition on Unit 2. Furthermore, Commonwealth Edison was informed that additional meetings would be granted if requested to resolve this issue and others prior to reaching the 5% restriction. Commonwealth Edison Company understands that at this time there is no definition of "hands on" fire training nor has the NRC staff provided guidance as to the acceptance criteria for such training. This is an issue with NRR which requires generic resolution for the industry. Therefore, no Unit 1 commitment as to Live Fire Training is made by means of this letter. Our commitment in Reference (c), Issue 9 stands as our commitment on this subject.

Prior to cancellation of any of the posted Fire Watches in Items A, B or C, the LaSalle Senior Resident Inspector will be notified. The commitments above may be adjusted based on the resolution of similar concerns addressed in reference (c) with subsequent notification.

To the best of my knowledge and belief the statements contained herein are true and correct. In some respects these statements are not based on my personal knowledge but upon information furnished by other Commonwealth Edison and contractor employees. Such information has been reviewed in accordance with Company practice and I believe it to be reliable.

If there are any further questions in this matter, please contact this office.

Very truly yours,

*C. W. Schroeder* 12/13/83

C. W. Schroeder  
Nuclear Licensing Administrator

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cc: NRC Resident Inspector - LSCS

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