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Dresden Generating Station
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10CFR50.36



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U. S. Nuclear Regulatory Commission
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Dresden Nuclear Power Station, Units 2 and 3
Facility Operating License Nos. DPR-19 and DPR-25
NRC Docket Nos. 50-237 and 50-249

Subject: Notification of Technical Specifications Bases Change, Technical
Specification Section 3/4.9, "Electrical Power Systems"

Commonwealth Edison (ComEd) Company has changed the Bases of Facility Operating
Licenses DPR-19 and DPR-25, Appendix A, Technical Specifications Bases Section
3/4.9, "Electrical Power Systems." This change was reviewed in accordance with 10
CFR 50.59.

This change in bases describes the testing currently used which provides a more recent
but equivalent method of ensuring diesel fuel oil is of the proper quality.

The following information has been changed in the Bases for Section 3/4.9.

3/4.9

Current Statement:

Sampling of both new diesel fuel oil and the bulk fuel oil storage tanks is in accordance
with the American Society for Testing Materials (ASTM) standard D4057. Testing for API
gravity is in accordance with ASTM D1298, water and sediment is in accordance with
ASTM D1796, and the visual test for free water and particulate contamination (clear and
bright) is in accordance with ASTM D4176. Testing for kinematic viscosity is in
accordance with ASTM D445 and particulate contaminate testing is in accordance with
ASTM D2276.

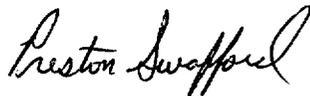
Revised Statement:

Sampling of both new diesel fuel oil and the bulk fuel oil storage tanks is in accordance with the American Society for Testing Materials (ASTM) standard D4057. Testing for API gravity is in accordance with ASTM D1298, water and sediment is in accordance with ASTM **D2709**, and the visual test for free water and particulate contamination (clear and bright) is in accordance with ASTM D4176. Testing for kinematic viscosity is in accordance with ASTM D445 and particulate contaminate testing is in accordance with ASTM **D5452**.

Attachment A provides the revised bases page B 3/4.9-4.

Should you have any questions concerning this letter, please contact Mr. D. F. Ambler at (815) 942-2920, extension 3800.

Respectfully,



Preston Swafford
Site Vice President
Dresden Nuclear Power Station

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

BASES

the surveillance intervals between all three (3) diesel generators further ensures that for any loaded diesel generator surveillances, not more than one diesel generator is rendered inoperable at any given time in order to perform such testing.

Surveillance requirements provide verification that there is an adequate inventory of fuel oil in the storage tanks that is sufficient to provide time to place the facility in a safe shutdown condition and to bring in replenishment fuel from an offsite location. Additional diesel fuel can normally be obtained and delivered to the site within an eight hour period; thus a two day supply provides for adequate margin. The operation of each required fuel oil transfer pump is demonstrated by transferring fuel oil from its associated storage tank to its associated day tank. This surveillance provides assurance that the fuel oil transfer pump is OPERABLE, the fuel oil piping system is intact, the fuel delivery piping is not obstructed, and the necessary fuel oil day tank instrumentation is OPERABLE.

A comprehensive surveillance program is provided to ensure the availability of high quality fuel oil for the diesel generators which is necessary to ensure proper operation. Water content should be minimized, because water in the fuel would contribute to excessive corrosion of the system, causing decreased reliability. The growth of micro-organisms results in slime formations, which are one of the chief causes of jelying in hydrocarbon fuels. Therefore, minimizing such slimes is also essential to assuring high reliability.

Sampling of both new diesel fuel oil and the bulk fuel oil storage tanks is in accordance with the American Society for Testing Materials (ASTM) standard D4057. Testing for API gravity is in accordance with ASTM D1298, water and sediment is in accordance with ASTM D1796, and the visual test for free water and particulate contamination (clear and bright) is in accordance with ASTM D4176. Testing for kinematic viscosity is in accordance with ASTM D445 and particulate contaminant testing is in accordance with ASTM D2276. Parameter limits are in accordance with ASTM D396 for API gravity, ASTM D975 for water and sediment and for kinematic viscosity, and ASTM D4176 for "clear and bright." The specific revision in use for each of these standards is controlled by procedure.

The diesel fuel oil day tanks are not equipped with the capability to obtain samples. Any accumulated water is removed by partially draining the day tank to the bulk fuel oil storage tank on a routine basis. Monthly sampling of the bulk fuel oil storage tank is then used to detect the presence of any water.

Fuel oil testing may indicate that such fuel oil is not within the required parameters. However, continued operation is acceptable while measures are taken to restore the properties of the fuel oil to within its limits since the properties of interest, even if they were not within the required limits, would not have an immediate effect on diesel generator operation. If the fuel oil properties cannot be returned to within their limits in the allowed time, the associated diesel generator(s) is (are) declared inoperable and the appropriate ACTION(s) taken.

A semi-annual surveillance is provided to verify the diesel generator can "fast start" from standby conditions and achieve the required voltage and frequency within the timing assumptions of the