



June 19, 2000

PSLTR-00-0093

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

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: Supplement to Request for an Amendment to Technical Specifications Section 3/4.6.K, "Primary System Boundary" and Section 3/4.12.C "Special Test Exceptions" and Request for Exemption from 10CFR 50.60, "Acceptance criteria for fracture prevention measures for lightwater nuclear power reactors for normal operation."

Reference: Letter from Preston Swafford (ComEd) to USNRC, "Request for an Amendment to Technical Specifications Section 3/4.6.K, 'Primary System Boundary' and Section 3/4.12.C 'Special Test Exceptions' and Request for Exemption from 10CFR 50.60, 'Acceptance criteria for fracture prevention measures for lightwater nuclear power reactors for normal operation,'" dated February 23, 2000.

In the referenced letter, we requested a change to Technical Specifications (TS) of Facility Operating License Nos. DPR-19 and DPR-25, for the Dresden Nuclear Power Station, Units 2 and 3, respectively. The proposed change is to TS Section 3/4.6.K, "Primary System Boundary" and Section 3/4.12.C, "Special Test Exceptions" and revises the Pressure-Temperature (P-T) limits for the reactor pressure vessel (RPV) of each unit to a maximum of 32 Effective Full Power Years (EFPYs).

The referenced letter submitted, as attachments, two General Electric Company reports containing proprietary information. Based on subsequent discussions with the NRC, both reports were revised to modify the proprietary markings and are enclosed as Attachment 1 to this letter. Requests for withholding this information from disclosure, in accordance with 10 CFR 2.790(a)(4), are provided in the preface of each report. Non-proprietary versions of both reports are included as Attachment 2 to this letter.

Also, during the review of this request, it was identified that a footnote to Table 1-2 contained in TS Section 1.0 "Definitions" also needed to be revised to remove reference to TS Section 3/4.12.C. This is only an administrative change and does not impact our safety analysis of this proposed change, our finding of no significant hazards

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Page 2

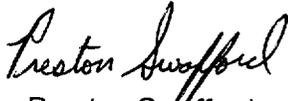
consideration, or the environmental assessment. Attachment 3 includes the marked-up TS page with the requested change indicated.

This proposed change has been reviewed in accordance with ComEd procedures.

ComEd is notifying the State of Illinois of this supplement by transmitting a copy of this letter to the designated State Official.

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

Respectfully,



Preston Swafford
Site Vice President
Dresden Nuclear Power Station

Attachments:

Attachment 1: GE-NE-B13-02057-00-03R1 "Pressure Temperature Curves for ComEd Dresden Unit 3," and GE-NE-B13-02057-00-04R1 "Pressure Temperature Curves for ComEd Dresden Unit 2"

Attachment 2: GE-NE-B13-02057-00-03aR1 "Pressure Temperature Curves for ComEd Dresden Unit 3," and GE-NE-B13-02057-00-04aR1 "Pressure Temperature Curves for ComEd Dresden Unit 2"

Attachment 3: Marked-Up Technical Specification Page For Proposed Change

cc: Regional Administrator – NRC Region III
NRC Senior Resident Inspector – Dresden Nuclear Power Station
Office of Nuclear Facility Safety - Illinois Department Nuclear Station

STATE OF ILLINOIS)
COUNTY OF GRUNDY)
IN THE MATTER OF)
COMMONWEALTH EDISON (COMED) COMPANY) Docket Numbers
DRESDEN NUCLEAR POWER STATION UNITS 2 and 3) 50-237 and 50-249
SUBJECT: Request for an Amendment to Technical Specifications Section 3 /4.6.K, "Primary System Boundary" and Section 3 /4.12.C "Special Test Exceptions" and Request for Exemption from 10CFR 50.60, "Acceptance criteria for fracture prevention measures for lightwater nuclear power reactors for normal operation."

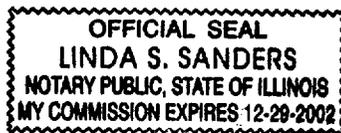
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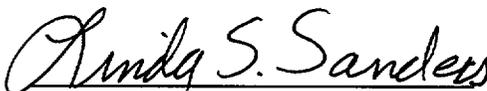
I affirm that the content of this transmittal is true and correct to the best of my knowledge, information and belief.



Preston Swafford
Site Vice President

Subscribed and sworn to before me, a Notary Public in and
for the State above named, this 19th day of
June, 2000.





Notary Public

ATTACHMENT 3
Proposed Change to Technical Specifications for
Dresden Nuclear Power Station, Units 2 and 3, Page 1 of 1

**ADDITIONAL MARKED-UP TECHNICAL SPECIFICATIONS PAGE FOR
PROPOSED CHANGE**

REVISED PAGE

Technical Specifications

Page 1-9

TABLE 1-2

OPERATIONAL MODES

<u>MODE</u>	<u>MODE SWITCH POSITION^(f)</u>	<u>AVERAGE REACTOR COOLANT TEMPERATURE</u>
1. POWER OPERATION	Run	Any temperature
2. STARTUP	Startup/Hot Standby	Any temperature
3. HOT SHUTDOWN	Shutdown ^(a,e)	> 212°F ^(d)
4. COLD SHUTDOWN	Shutdown ^(a,b,e)	≤ 212°F
5. REFUELING ^(c)	Shutdown or Refuel ^(a,d)	≤ 140°F

TABLE NOTATIONS

- (a) The reactor mode switch may be placed in the Run, Startup/Hot Standby or Refuel position to test the switch interlock functions provided the control rods are verified to remain fully inserted by a second licensed operator or other technically qualified individual.
- (b) The reactor mode switch may be placed in the Refuel position while a single control rod drive is being removed from the reactor pressure vessel per Specification 3.10.I.
- (c) Fuel in the reactor vessel with one or more vessel head closure bolts less than fully tensioned or with the head removed.
- (d) See Special Test Exceptions 3.12.A, 3.12.B and 3.12.C.
- (e) The reactor mode switch may be placed in the Refuel position while a single control rod is being moved provided the one-rod-out interlock is OPERABLE.
- (f) When there is no fuel in the reactor vessel, the reactor is considered not to be in any OPERATIONAL MODE. The reactor mode switch may then be in any position or may be inoperable.

ATTACHMENT 1
Supplement to Request for an Amendment to
Technical Specifications for
Dresden Nuclear Power Station, Units 2 and 3, Page 1 of 1

GE-NE-B13-02057-00-03R1
Pressure Temperature Curves for ComEd Dresden Unit 3
Proprietary Information

GE-NE-B13-02057-00-04R1
Pressure Temperature Curves for ComEd Dresden Unit 2
Proprietary Information

ATTACHMENT 2
Supplement to Request for an Amendment to
Technical Specifications for
Dresden Nuclear Power Station, Units 2 and 3, Page 1 of 1

GE-NE-B13-02057-00-03aR1
Pressure Temperature Curves for ComEd Dresden Unit 3
Non-Proprietary Information

GE-NE-B13-02057-00-04aR1
Pressure Temperature Curves for ComEd Dresden Unit 2
Non-Proprietary Information