



August 31, 2000

PSLTR# 00-0120

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: Proposed Change to Technical Specifications
Emergency Diesel Generator Surveillance Testing Requirements

Reference: Letter from R. M. Krich to USNRC, "Request for Technical Specifications Changes for Dresden Nuclear Power Station, Units 2 and 3, LaSalle County Station, Units 1 and 2, and Quad Cities Nuclear Power Station, Units 1 and 2, to Convert to Improved Standard Technical Specifications," dated March 3, 2000.

In accordance with 10 CFR 50.90, Commonwealth Edison (ComEd) Company requests changes to the Technical Specifications (TS) of Facility License Nos. DPR-19 and DPR-25 for the Dresden Nuclear Power Station (DNPS), Units 2 and 3 respectively. The proposed changes affect the Emergency Diesel Generator (EDG) TS Surveillance Requirements (SR) found in TS Section 3/4.9, "A.C. Sources – Operating."

The principal proposed change is to provide more restrictive EDG allowable voltage limits (i.e., from $\pm 10\%$ to $\pm 5\%$) during surveillance testing. The current large TS voltage tolerances could, in theory, allow EDG operation at the lower end of the voltage limits which may not support Emergency Core Cooling System (ECCS) loads. Reducing the EDG allowable voltage limits to $\pm 5\%$ resolves this issue and also complies with the performance standards in National Electrical Manufacturer's Association (NEMA) Standards, Part 22, Large Apparatus- Synchronous Generators. The EDGs at DNPS were purchased in accordance with NEMA standards. The EDGs have historically operated within these proposed TS acceptance limits.

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Also, in addition to the voltage tolerance change, time limits are established for both frequency and voltage allowable values for the EDG single load reject test (i.e., SR 4.9.A.8.b).

As these new tolerances are more conservative than those currently in the the TS, administrative controls are being instituted in accordance with the guidelines outlined in the NRC's Administrative Letter (AL) 98-10, "Dispositioning of Technical Specifications that are Insufficient to Assure Plant Safety."

This proposed change has been reflected in the referenced Improved Technical Specification (ITS) license amendment request. Therefore, no marked-up ITS pages are included. However, this submittal affects a Discussion of Change (DOC) for ITS Section 3.8, DOC. A.13. This DOC will be changed to reference this amendment request in a subsequent ITS submittal.

The request is subdivided as follows:

1. Attachment A gives a description and safety analysis of the proposed change,
2. Attachment B includes the marked-up TS pages with the requested change indicated,
3. Attachment C provides information supporting a finding of no significant hazards consideration in accordance with 10 CFR 50.92(c),
4. Attachment D provides information supporting an Environmental Assessment.

ComEd requests approval of this proposed TS change by March 2, 2001.

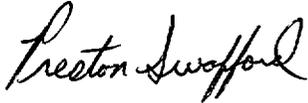
These proposed changes have been reviewed by the Plant Operations Review Committee and the Nuclear Safety Review Board in accordance with the Quality Assurance Program.

ComEd is notifying the State of Illinois of this request for changes to the TS by transmitting a copy of this letter and its attachments to the designated State Official.

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

Sincerely,



Preston Swafford
Site Vice President
Dresden Nuclear Power Station

Attachments: Affidavit

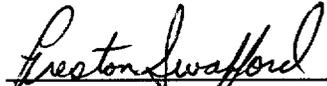
- A. Description and Safety Analysis for Proposed Changes
- B. Marked-Up Technical Specifications Pages
- C. Information Supporting a Finding of No Significant Hazards Consideration
- D. Information Supporting an Environmental Assessment

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

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: Proposed License Amendment Request
Emergency Diesel Generator Surveillance Requirements

AFFIDAVIT

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



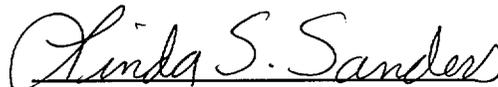
Preston Swafford
Site Vice President
Dresden Nuclear Power Station

Subscribed and sworn to before me, a Notary Public in and

for the State above named, this 31st day of

August, 2000.





Notary Public

ATTACHMENT A

Proposed Change to Technical Specifications Dresden Nuclear Power Station - Units 2 and 3 (Page 1 of 5)

DESCRIPTION AND SAFETY ANALYSIS FOR PROPOSED CHANGES

A. SUMMARY OF PROPOSED CHANGES

In accordance with 10 CFR 50.90, "Application for amendment of license or construction permit," Commonwealth Edison (ComEd) Company is requesting a change to Appendix A, Technical Specification (TS), Facility Operating License Nos. DPR-19 and DPR-25, for Dresden Nuclear Power Station (DNPS), Units 2 and 3 respectively. The proposed change modifies the following TS Surveillance Requirements for the Emergency Diesel Generator (EDG):

- TS Section 4.9.A.2.c
- TS Section 4.9.A.7
- TS Section 4.9.A.8.b
- TS Section 4.9.A.8.d.(2)
- TS Section 4.9.A.8.e
- TS Section 4.9.A.8.f.(2)
- TS Section 4.9.A.8.h

The principal proposed change is to provide more restrictive EDG allowable voltage limits (i.e., from $\pm 10\%$ to $\pm 5\%$) during surveillance testing. The current large TS voltage tolerances may, in theory, allow EDG operation at the lower end of the voltage limits which may not support Emergency Core Cooling System (ECCS) loads. Reducing the EDG allowable voltage limits to $\pm 5\%$ resolves this issue and also complies with the performance standards in National Electrical Manufacturer's Association (NEMA) Standards, Part 22, Large Apparatus – Synchronous Generators. The EDGs at DNPS were purchased in accordance with NEMA standards.

Furthermore, the EDGs have historically operated within the proposed TS acceptance limits. Although our current TS are consistent with the Improved Standard Technical Specifications (ISTS) (i.e., NUREG 1433, Revision 1, "Standard Technical Specifications GENERAL ELECTRIC PLANTS, BWR/4"), the proposed voltage tolerance aligns the TS Surveillance Requirements with the original EDG design specifications.

Also, for TS Surveillance Requirement 4.9.A.8.b, it was determined that time limits need to be established for the single load reject test voltage and frequency allowable values.

As these new tolerances are more conservative than those currently in the the TS, administrative controls are being instituted in accordance with the guidelines outlined in the NRC's Administrative Letter (AL) 98-10, "Dispositioning of Technical Specifications that are Insufficient to Assure Plant Safety."

ATTACHMENT A

Proposed Change to Technical Specifications Dresden Nuclear Power Station - Units 2 and 3 (Page 2 of 5)

The proposed changes are described in detail in Section E of this Attachment. The marked up TS pages are provided in Attachment B.

B. DESCRIPTION OF THE CURRENT REQUIREMENTS

TS Surveillance Requirement 4.9.A.2.c is performed every 31 days. This surveillance demonstrates proper startup from standby conditions, and verifies the required design voltage and frequency is obtained within the acceptance limits.

TS Surveillance Requirement 4.9.A.7 is performed every 184 days. This surveillance demonstrates proper fast-start capability from standby conditions, and verifies the required design voltage and frequency is obtained within the acceptance limits and required timeframe.

TS Surveillance Requirement 4.9.A.8.b is performed every 18 months. This surveillance demonstrates the capability of the EDG to reject the largest single emergency load. Following loss of the largest single emergency load, the EDG is required to return to the allowed frequency and voltage tolerances.

TS Surveillance Requirement 4.9.A.8.d.(2) is performed every 18 months. This surveillance simulates a loss of offsite power (LOOP) and verifies the EDG auto-starts, energizes the emergency buses in less than or equal to 13 seconds, and obtains the required voltage and frequency within the acceptance limits.

TS Surveillance Requirement 4.9.A.8.e is performed every 18 months. This surveillance demonstrates that on a safety injection actuation test signal, the EDG starts on the auto-start signal from a standby condition and attains the required voltage and frequency within the acceptable limits and required timeframe.

TS Surveillance Requirement 4.9.A.8.f.(2) is performed every 18 months. This surveillance demonstrates that the EDG can satisfactorily respond to a LOOP in conjunction with a safety injection actuation signal. The test demonstrates the EDG starts, from a standby condition, energizes the emergency buses in less than 13 seconds, and operates permanently auto connected loads. After energizing the buses, this surveillance also demonstrates that the allowable steady-state voltage and frequency are maintained within the acceptable limits.

TS Surveillance Requirement 4.9.A.8.h is performed every 18 months. This test is a 24-hour endurance run that demonstrates full-load carrying capability at the required voltage and frequency.

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Proposed Change to Technical Specifications Dresden Nuclear Power Station - Units 2 and 3 (Page 3 of 5)

C. BASES FOR THE CURRENT REQUIREMENTS

Surveillance requirements are provided to demonstrate the operability of the EDGs. The testing program is designed to test the ability to start the system from a standby condition as well as run under emergency load conditions. The testing requirements ensure that required EDG voltage and frequency is attained. The current voltage operating range specified in EDG Surveillance Requirements is consistent with the ISTS.

D. NEED FOR REVISION OF THE REQUIREMENTS

The proposed change is to provide more restrictive EDG allowable voltage limits (i.e., from $\pm 10\%$ to $\pm 5\%$) during surveillance testing. The current large TS voltage tolerances may, in theory, allow EDG operation at the lower end of the voltage limits which could not support operation of ECCS loads within design voltages. Reducing the EDG allowable voltage limits to $\pm 5\%$ resolves this issue. The EDGs were purchased in accordance with General Electric (GE) specifications for diesel engine-driven generators required for nuclear power plants. The EDG design specifications required the equipment to meet applicable codes and standards including the NEMA Standards. NEMA "Motor Generator-1," (NEMA MG-1) provides the following requirement:

MG-1 Section 22, Paragraph 47

"Synchronous generators shall operate successfully at rated kVA, frequency, and power factor at any voltage not more than 5 percent above or below rated voltage..."

The proposed change aligns the EDG TS Surveillance Requirements with the original performance requirements specified in NEMA MG-1 and resolves the potential issues related to use of an EDG voltage tolerance of $\pm 10\%$.

For TS Surveillance Requirement 4.9.A.8.b, no time limits exist, following load rejection, to meet the single load reject test voltage and frequency allowable values. Specific time limits are needed for both the voltage and frequency allowable values in order to be consistent with ISTS.

E. DESCRIPTION OF THE PROPOSED CHANGE

The proposed change conservatively reduces the allowable voltage tolerance from $\pm 10\%$ to $\pm 5\%$ for the following EDG surveillance requirements:

TS Section 4.9.A.2.c
TS Section 4.9.A.7
TS Section 4.9.A.8.b
TS Section 4.9.A.8.d.(2)

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Proposed Change to Technical Specifications Dresden Nuclear Power Station - Units 2 and 3 (Page 4 of 5)

TS Section 4.9.A.8.e
TS Section 4.9.A.8.f.(2)
TS Section 4.9.A.8.h

The allowable EDG acceptance voltage tolerance is proposed to be changed from the current 4160 ± 420 Volts to 4160 ± 208 Volts.

For TS Section 4.9.A.8.b, time limits are established for both frequency and voltage to return within allowable values. These limits are based on guidance provided in Regulatory Guide 1.9, "Selection, Design, and Qualification of Diesel Generator Units Used as Standby (Onsite) Electric Power Systems at Nuclear Power Plants," Revision 3, Regulatory Position 1.4.

Regulatory Position 1.4 allows frequency to return to its allowable values within 80 percent of the load sequence interval and for voltage to return to its allowable values within 60 percent of the load sequence interval. With the load sequence interval at DNPS equal to five seconds, the time limit for frequency is four seconds and the time limit for voltage is three seconds.

F. SAFETY ANALYSIS OF THE PROPOSED CHANGES

Each EDG must be capable of starting, accelerating to rated speed and voltage, and connect to its respective emergency bus on detection of a bus undervoltage condition. Each EDG must also be capable of accepting required loads within the assumed loading sequence intervals analyzed in the plant accident analysis.

TS Surveillance Requirements are provided for demonstrating the OPERABILITY of the EDGs.

The proposed voltage tolerance change is conservative in nature in that it reduces the required voltage tolerance from 4160 ± 420 Volts to 4160 ± 208 Volts. This proposed voltage tolerance supports operation of all required EDG loads within the design voltage ranges for these loads.

Periodic testing demonstrates that the EDG can attain the proper operating voltage range following a start. Our review of past surveillances has confirmed that the new tolerance range of 4160 ± 208 Volts can be met.

Therefore there is no adverse impact on plant safety.

With respect to the time limits set for the single load reject test, these limits are conservative and established in accordance with the guidelines of Regulatory Guide 1.9, Revision 3. As this change also provides a restrictive TS Surveillance Requirement, there also is no adverse impact on plant safety.

ATTACHMENT A

Proposed Change to Technical Specifications Dresden Nuclear Power Station - Units 2 and 3 (Page 5 of 5)

G. IMPACT ON PREVIOUS SUBMITTALS

ComEd has determined that the amendment request contained herein has no impact on submittals currently under review by the NRC.

H. SCHEDULE REQUIREMENTS

ComEd requests approval of the proposed change by March 2, 2001 in order to support our conversion to the ISTS.

I. REFERENCES

None

ATTACHMENT B

**Proposed Change to Technical Specifications
Dresden Nuclear Power Station - Units 2 and 3**

Marked-up Technical Specifications Changes

3.9 - LIMITING CONDITIONS FOR OPERATION

- b. Restore the inoperable offsite circuit to OPERABLE status within 7 days or be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.
2. With one of the above required diesel generator power sources inoperable:
- a. Demonstrate the OPERABILITY of the offsite circuit power sources by performing Surveillance Requirement 4.9.A.1.a within 1 hour and at least once per 8 hours thereafter.
- b. If the diesel generator is inoperable due to any cause other than an inoperable support system, an independently testable component, or preplanned preventive maintenance or testing, demonstrate the OPERABILITY of the remaining OPERABLE diesel generator by performing Surveillance Requirement 4.9.A.2.c^(b) within 24 hours unless the absence of any potential common mode failure for the remaining diesel generator is demonstrated (if it has not been successfully tested within the past 24 hours) and within the subsequent 72 hours, and

4.9 - SURVEILLANCE REQUIREMENTS

- c. Verifying^(d) the diesel starts and accelerates to synchronous speed with generator voltage and frequency at 4160 ± 420 volts and 60 ± 1.2 Hz, respectively. 208
- d. Verifying the diesel generator is synchronized, loaded to between 2470 and 2600 kW^(d) in accordance with the manufacturer's/vendor's recommendations, and operates with this load for ≥ 60 minutes.
- e. Verifying the diesel generator is aligned to provide standby power to the associated emergency busses.
- f. Verifying the pressure in required starting air receiver tanks to be ≥ 220 psig.
3. Each of the required diesel generators shall be demonstrated OPERABLE at least once per 31 days and after each operation of the diesel where the period of operation was ≥ 1 hour by removing any accumulated water from the day tank.
4. Each of the required diesel generators shall be demonstrated OPERABLE at least once per 92 days by checking for and removing accumulated water from the fuel oil bulk storage tanks.

- b. Contrary to the provisions of Specification 3.0.B, this test is required to be completed regardless of when the inoperable diesel generator is restored to OPERABILITY for failures that are potentially generic to the remaining diesel generator and for which appropriate alternative testing cannot be designed.
- c. Surveillance Requirement 4.9.A.7 may be substituted for Surveillance Requirement 4.9.A.2.c.
- d. Momentary transients outside of the load range do not invalidate this test. Diesel generator loadings may include gradual loading as recommended by the manufacturer/vendor. This surveillance shall be conducted on only one diesel generator at a time.

3.9 - LIMITING CONDITIONS FOR OPERATION

- c. Restore at least one of the inoperable A.C. power sources to OPERABLE status within 12 hours or be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours, and
 - d. Restore both offsite circuits and both diesel generators to OPERABLE status within 7 days from the time of the initial loss or be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.
4. With one of the above required diesel generator power sources inoperable, in addition to ACTION 2 or 3, as applicable:
- a. Verify within 2 hours that at least one of the required two systems, subsystems, trains, components and devices in two train systems is OPERABLE including its emergency power supply.
 - b. Otherwise, take the applicable ACTIONS for both systems, subsystems, trains, components or devices inoperable, or be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.

4.9 - SURVEILLANCE REQUIREMENTS

- 7. Each of the required diesel generators shall be demonstrated OPERABLE^(a) at least once per 184 days by verifying^(c) the diesel starts and accelerates to synchronous speed in ≤ 13 seconds. The generator voltage and frequency shall be verified to reach 4160 ± 470 volts and 60 ± 1.2 Hz, respectively, in ≤ 13 seconds after the start signal.
- 8. Each of the required diesel generators shall be demonstrated OPERABLE^(a) at least once per 18 months by:
 - a. Deleted.

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a All diesel generator starts may be preceded by an engine prelube period. All diesel generator starts that require loading may be preceded by an engine prelube period and followed by a warmup period prior to loading. Diesel generator loadings may include gradual loading as recommended by the manufacturer/vendor.

c Surveillance Requirement 4.9.A.7 may be substituted for Surveillance Requirement 4.9.A.2.c.

3.9 - LIMITING CONDITIONS FOR OPERATION

4.9 - SURVEILLANCE REQUIREMENTS

- 5. With two of the above required offsite circuit power sources inoperable:
 - a. Restore at least one of the inoperable offsite circuits to OPERABLE status within 24 hours or be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours, and
 - b. Restore at least two offsite circuits to OPERABLE status within 7 days from the time of initial loss or be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.
- 6. With both of the above required diesel generator power sources inoperable:
 - a. Demonstrate the OPERABILITY of the offsite circuit power sources by performing Surveillance Requirement 4.9.A.1.a within 1 hour and at least once per 8 hours thereafter.

Insert 1 →

b. ~~Verifying the diesel generator capability to reject its largest single emergency load (≥ 642 kW) while maintaining frequency ≤ 66.73 Hz and voltage at 4160 ± 420 volts.~~

- c. Verifying the diesel generator capability to reject a load between 2470 and 2600 kw^(d), without tripping on overspeed. The generator voltage shall not exceed 5000 volts^(e) during or following the load rejection.
- d. Simulating a loss of offsite power by itself, and:
 - 1) Verifying de-energization of the emergency buses, and load shedding from the emergency buses.
 - 2) Verifying the diesel starts on the auto-start signal, energizes the emergency buses with permanently connected loads in ≤ 13 seconds, energizes the auto-connected shutdown loads, and operates with this load for ≥ 25 minutes. After energization, the steady-state voltage and frequency of the emergency busses shall be maintained at 4160 ± 420 volts and 60 ± 1.2 Hz, respectively, during this test.

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- d Momentary transients outside of the load range do not invalidate this test. Diesel generator loadings may include gradual loading as recommended by the manufacturer/vendor. This surveillance shall be conducted on only one diesel generator at a time.
- g Momentary transients outside of the voltage limit do not invalidate this test.

INSERT 1 to page 3/4.9-5 (SR 4.9.A.8.b):

- b. Verify the diesel generator rejects a load greater than or equal to its largest single emergency load (≥ 642 kW), and:**
- 1) Following load rejection, the frequency is ≤ 66.73 Hz.**
 - 2) Within 3 seconds following load rejection, the voltage is 4160 ± 208 volts.**
 - 3) Within 4 seconds following load rejection, the frequency is 60 ± 1.2 Hz.**

3.9 - LIMITING CONDITIONS FOR OPERATION

- b. Within 2 hours, restore at least one of the above required diesel generators to OPERABLE^(e) status and verify that at least one of the required two systems, subsystems, trains, components and devices in two train systems is OPERABLE including its emergency power supply. Otherwise, take the applicable ACTIONS for both systems, subsystems, trains, components or devices inoperable, or be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.
- c. Demonstrate the continued OPERABILITY of the restored diesel generator by performing Surveillance Requirement 4.9.A.2.c within the subsequent 72 hours, and
- d. Restore at least two required diesel generators to OPERABLE status within 7 days from the time of initial loss or be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.
7. With the fuel oil contained in the bulk fuel storage tank(s) not meeting the properties specified in Surveillance Requirements 4.9.A.5 and 4.9.A.6, restore the fuel oil properties to within the specified limits within 7 days. Otherwise, declare the associated diesel generator(s) inoperable.

4.9 - SURVEILLANCE REQUIREMENTS

- e. Verifying that on an ECCS actuation test signal, without loss of offsite power, the diesel generator starts on the auto-start signal and operates on standby for ≥ 5 minutes. The generator voltage and frequency shall be 4160 ± 420 volts and 60 ± 1.2 Hz, respectively, in ≤ 13 seconds after the auto-start signal; the steady state generator voltage and frequency shall be maintained within these limits during this test. 208
- f. Simulating a loss of offsite power in conjunction with an ECCS actuation test signal, and
- 1) Verifying de-energization of the emergency buses, and load shedding from the emergency buses.
 - 2) Verifying the diesel starts on the auto-start signal, energizes the emergency buses with permanently connected loads in ≤ 13 seconds, energizes the auto-connected emergency loads through the load sequencer, and operates with this load for ≥ 5 minutes. After energization, the steady-state voltage and frequency of the emergency busses shall be maintained at 4160 ± 420 volts and 60 ± 1.2 Hz, respectively, during this test. 208

e A successful test of OPERABILITY per Surveillance Requirement 4.9.A.2.c under this ACTION statement satisfies the diesel generator test requirements of ACTION(s) 1 or 2 above.

3.9 - LIMITING CONDITIONS FOR OPERATION

4.9 - SURVEILLANCE REQUIREMENTS

- g. Verifying that all automatic diesel generator trips, except engine overspeed and generator differential current are automatically bypassed upon an emergency actuation signal.
- h. Verifying the diesel generator operates for ≥ 24 hours. During the first 2 hours of this test, the diesel generator shall be loaded to between 2730 and 2860 kW^(d) and during the remaining 22 hours of this test, the diesel generator shall be loaded to between 2470 and 2600 kW^(d). The generator voltage and frequency shall be 4160 ± 420 volts and 60 ± 1.2 Hz, respectively, in ≤ 13 seconds after the start signal; the steady state generator voltage and frequency shall be maintained within these limits during this test. Within 5 minutes after completing this 24 hour test, perform Surveillance Requirement 4.9.A.2.c^(f). 208
- i. Verifying that the auto-connected loads to each diesel generator do not exceed the 2000 hour rating of 2860 kW.

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- d Momentary transients outside of the load range do not invalidate this test. Diesel generator loadings may include gradual loading as recommended by the manufacturer/vendor. This surveillance shall be conducted on only one diesel generator at a time.
 - f If Surveillance Requirement 4.9.A.2.c is not satisfactorily completed, it is not necessary to repeat the preceding 24 hour test. Instead, the diesel generator may be operated at approximately full load for 2 hours or until the operating temperature has stabilized.

ATTACHMENT C

Proposed Change to Technical Specifications Dresden Nuclear Power Station - Units 2 and 3 (Page 1 of 2)

INFORMATION SUPPORTING A FINDING OF NO SIGNIFICANT HAZARDS CONSIDERATION

Commonwealth Edison (ComEd) Company has evaluated the proposed Technical Specifications (TS) change for Dresden Nuclear Power Station Units 2 and 3, and has determined that it involves no significant hazards consideration. According to 10 CFR 50.92(c), "Issuance of amendment," a proposed change to an operating license involves no significant hazards consideration if operation of the facility in accordance with the proposed change would not:

Involve a significant increase in the probability of occurrence or consequences of an accident previously evaluated;

Create the possibility of a new or different kind of accident from any previously analyzed; or

Involve a significant reduction in a margin of safety.

ComEd is proposing to conservatively reduce the allowable voltage tolerance for Emergency Diesel Generator surveillance testing specified in TS Section 3/4.9, "Electric Power Systems," from $\pm 10\%$ to $\pm 5\%$ and also to provide time limits for TS Surveillance Requirement Section 4.9.A.8.b. The determination that the criteria set forth in 10 CFR 50.92 are met for this change is provided below:

Does the change involve a significant increase in the probability or consequences of an accident previously evaluated?

The change does not involve a significant increase in the probability or consequences of an accident previously evaluated. The proposed changes are to certain TS Section 3/4.9 Surveillance Requirement acceptance values that are more conservative with respect to current requirements, and continue to ensure equipment operability. By continuing to ensure equipment operability, the probability or consequences of an accident previously evaluated are not increased. In addition, the proposed changes have no impact on any initial condition assumptions for accident scenarios. Onsite or offsite dose consequences resulting from an event previously evaluated are not affected by this proposed amendment request.

Accordingly, there is no significant change in the probability or consequences of an accident previously evaluated.

ATTACHMENT C

Proposed Change to Technical Specifications Dresden Nuclear Power Station - Units 2 and 3 (Page 2 of 2)

Does the change create the possibility of a new or different kind of accident from any accident previously evaluated?

The proposed license amendment provides changes in certain TS Surveillance Requirements that are either more conservative with respect to current requirements or only clarify the intent of the surveillance, and continue to ensure equipment operability. The proposed amendment does not involve any plant physical changes.

Therefore, the proposed amendment does not create the possibility of a new or different kind of accident from any accident previously evaluated.

Does the change involve a significant reduction in a margin of safety?

The proposed change does not involve a significant reduction in the margin of safety. In fact, the proposed changes are conservative and continue to ensure equipment operability. Since the changes maintain the necessary level of system reliability, they do not involve a significant reduction in the margin of safety.

Therefore, based upon the above evaluation, ComEd has concluded that these changes involve a no significant hazards consideration.

ATTACHMENT D

Proposed Change to Technical Specifications Dresden Nuclear Power Station - Units 2 and 3 (Page 1 of 1)

INFORMATION SUPPORTING AN ENVIRONMENTAL ASSESSMENT

Commonwealth Edison (ComEd) Company has evaluated the proposed change to the Technical Specifications (TS) against the criteria for identification of licensing and regulatory actions requiring environmental assessment in accordance with 10 CFR 51.21, "Criteria for and identification of licensing and regulatory actions requiring environmental assessments." ComEd has determined that this change meets the criteria for a categorical exclusion set forth in 10 CFR 51.22(c)(9) and as such, has determined that no irreversible consequences exist in accordance with 10 CFR 50.92(b). This determination is based on the fact that this change is being proposed as an amendment to a license issued pursuant to 10 CFR 50, "Domestic Licensing of Production and Utilization Facilities," that changes a requirement with respect to installation or use of a facility component located within the restricted area, as defined in 10 CFR 20, "Standards for Protection Against Radiation," or that changes an inspection or a surveillance requirement, and the proposed change meets the following specific criteria:

- (i) the proposed change involves no significant hazards consideration.

As demonstrated in Attachment C, this proposed amendment does not involve any significant hazards consideration.

- (ii) there is no significant change in the types or significant increase in the amounts of any effluent that may be released offsite.

As documented in Attachment C, there will be no significant change in the types or significant increase in the amounts of any effluents released offsite.

- (iii) there is no significant increase in individual or cumulative occupational radiation exposure.

The proposed change will not result in changes to the operation of the facility. There will be no change in the level of controls or methodology used for processing of radioactive effluents or handling of solid radioactive waste, nor will the proposal result in any change in the normal radiation levels within the plant. Therefore, there will be no significant increase in individual or cumulative occupational radiation exposure resulting from this proposed change.