Mr. Oliver D. Kingsley, President Nuclear Géneration Group Exelon Generation Company Executive Towers West III 1400 Opus Place, Suite 500

Downers Grove, IL 60515

March 23, 2001

SUBJECT: DRESDEN NUCLEAR POWER STATION, UNITS 2 AND 3 - ISSUANCE OF

AMENDMENTS (TAC NOS. MB0987 AND MB0988)

Dear Mr. Kingsley:

The U.S. Nuclear Regulatory Commission (Commission) has issued the enclosed Amendment No. 184 to Facility Operating License No. DPR-19 and Amendment No. 179 to Facility Operating License No. DPR-25 for Dresden, Units 2 and 3. The amendments are in response to your application dated February 29, 2000, as supplemented by letter dated January 11, 2001. The application and supplement were submitted by Commonwealth Edison Company (ComEd), which has since merged to form Exelon Generation Company, LLC (EGC). By letter dated February 7, 2001, EGC, the licensee, assumed responsibility for all pending NRC actions that were requested by ComEd.

The amendments reduce the number of safety valves required for overpressure protection at Dresden Nuclear Power Station, Unit 2, by removing from Technical Specifications (TS) Section 3.6.E, the safety valve function and setpoint of the Target Rock safety/relief valve. The amendments also move the remaining safety valve lift pressure setpoints from TS Section 3.6.E to TS Section 4.6.E, change the number of required safety valves from nine to eight, and remove footnote "c" of Unit 3 TS Section 4.6.E.

A copy of the Safety Evaluation is also enclosed. The Notice of Issuance will be included in the Commission's biweekly <u>Federal</u> <u>Register</u> notice.

Sincerely,

/RA/

Lawrence W. Rossbach, Project Manager, Section 2

Project Directorate III

Division of Licensing Project Management Office of Nuclear Reactor Regulation

Docket Nos. 50-237 and 50-249

Enclosures: 1. Amendment No. 184 to DPR-19

2. Amendment No. 179 to DPR-25

3. Safety Evaluation

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WASHINGTON, D.C. 20555-0001

March 23, 2001

Mr. Oliver D. Kingsley, President Exelon Nuclear Exelon Generation Company Executive Towers West III 1400 Opus Place, Suite 500 Downers Grove, IL 60515

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Dear Mr. Kingsley:

The U.S. Nuclear Regulatory Commission (Commission) has issued the enclosed Amendment No. 184 to Facility Operating License No. DPR-19 and Amendment No. 179 to Facility Operating License No. DPR-25 for Dresden, Units 2 and 3. The amendments are in response to your application dated February 29, 2000, as supplemented by letter dated January 11, 2001. The application and supplement were submitted by Commonwealth Edison Company (ComEd), which has since merged to form Exelon Generation Company, LLC (EGC). By letter dated February 7, 2001, EGC, the licensee, assumed responsibility for all pending NRC actions that were requested by ComEd.

The amendments reduce the number of safety valves required for overpressure protection at Dresden Nuclear Power Station, Unit 2, by removing from Technical Specifications (TS) Section 3.6.E, the safety valve function and setpoint of the Target Rock safety/relief valve. The amendments also move the remaining safety valve lift pressure setpoints from TS Section 3.6.E to TS Section 4.6.E, change the number of required safety valves from nine to eight, and remove footnote "c" of Unit 3 TS Section 4.6.E.

A copy of the Safety Evaluation is also enclosed. The Notice of Issuance will be included in the Commission's biweekly <u>Federal Register</u> notice.

Sincerely,

Lawrence W. Rossbach, Project Manager, Section 2

Project Directorate III

Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket Nos. 50-237 and 50-249

Enclosures: 1. Amendment No. 184 to DPR-19

2. Amendment No. 179 to DPR-25

3. Safety Evaluation



WASHINGTON, D.C. 20555-0001

EXELON GENERATION COMPANY, LLC

DOCKET NO. 50-237

DRESDEN NUCLEAR POWER STATION, UNIT 2

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 184 License No. DPR-19

- 1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Exelon Generation Company, LLC (the licensee, formerly Commonwealth Edison Company) dated February 29, 2000, as supplemented by letter dated January 11, 2001, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.
- 2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment and paragraph 2.C.(2) of Facility Operating License No. DPR-19 is hereby amended to read as follows:

(2) <u>Technical Specifications</u>

The Technical Specifications contained in Appendix A, as revised through Amendment No. $184\,$, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of the date of its issuance and shall be implemented within 30 days.

FOR THE NUCLEAR REGULATORY COMMISSION

Anthony J. Mendiola, Chief, Section 2

Project Directorate III

Division of Licensing Project Management

Office of Nuclear Reactor Regulation

Attachment:
Changes to the Technical
Specifications

Date of Issuance: March 23, 2001

O. Kingsley Exelon Generation Company, LLC

cc:

Exelon Generation Company, LLC Site Vice President - Dresden 6500 N. Dresden Road Morris, Illinois 60450-9765

Exelon Generation Company, LLC Station Manager - Dresden 6500 N. Dresden Road Morris, Illinois 60450-9765

Exelon Generation Company, LLC Regulatory Assurance Manager - Dresden 6500 N. Dresden Road Morris, Illinois 60450-9765

U.S. Nuclear Regulatory Commission Dresden Resident Inspectors Office 6500 N. Dresden Road Morris, Illinois 60450-9766

Chairman Grundy County Board Administration Building 1320 Union Street Morris, Illinois 60450

Regional Administrator U.S. NRC, Region III 801 Warrenville Road Lisle, Illinois 60532-4351

Illinois Department of Nuclear Safety Office of Nuclear Facility Safety 1035 Outer Park Drive Springfield, Illinois 62704

Document Control Desk-Licensing Exelon Generation Company, LLC 1400 Opus Place, Suite 500 Downers Grove, Illinois 60515 Dresden Nuclear Power Station Units 2 and 3

Mr. John Skolds Chief Operating Officer Exelon Generation Company, LLC 1400 Opus Place, Suite 900 Downers Grove, Illinois 60515

Mr. John Cotton Senior Vice President, Operation Support Exelon Generation Company, LLC 1400 Opus Place, Suite 900 Downers Grove, Illinois 60515

Mr. William Bohlke Senior Vice President, Nuclear Services Exelon Generation Company, LLC 1400 Opus Place, Suite 900 Downers Grove, Illinois 60515

Mr. H. Gene Stanley Vice President Mid-West Regional Operating Group Exelon Generation Company, LLC 1400 Opus Place, Suite 900 Downers Grove, Illinois 60515

Mr. Christopher Crane Senior Vice President Mid-West Regional Operating Group Exelon Generation Company, LLC 1400 Opus Place, Suite 900 Downers Grove, Illinois 60515

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O. Kingsley
Exelon Generation Company, LLC

Dresden Nuclear Power Station - 2 - Units 2 and 3

Mr. R. M. Krich
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Mr. Robert Helfrich Senior Counsel, Nuclear Mid-West Regional Operating Group Exelon Generation Company, LLC 1400 Opus Place, Suite 900 Downers Grove, IL 60515



WASHINGTON, D.C. 20555-0001

EXELON GENERATION EDISON COMPANY, LLC

DOCKET NO. 50-249

DRESDEN NUCLEAR POWER STATION, UNIT 3

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 179 License No. DPR-25

- 1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Exelon Generation Company, LLC (the licensee, formerly Commonwealth Edison Company) dated February 29, 2000, as supplemented by letter dated January 11, 2001, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.
- 2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment and paragraph 3.B. of Facility Operating License No. DPR-25 is hereby amended to read as follows:

B. <u>Technical Specifications</u>

The Technical Specifications contained in Appendix A, as revised through Amendment No. 179, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of the date of its issuance and shall be implemented within 30 days.

FOR THE NUCLEAR REGULATORY COMMISSION

Anthony J. Mendiola, Chief, Section 2

Project Directorate III

Division of Licensing Project Management

Office of Nuclear Reactor Regulation

Attachment:
Changes to the Technical
Specifications

Date of Issuance: March 23, 2001

ATTACHMENT TO LICENSE AMENDMENT NOS. 184 AND 179

FACILITY OPERATING LICENSE NOS. DPR-19 AND DPR-25

DOCKET NOS. 50-237 AND 50-249

Revise the Appendix "A" Technical Specifications by replacing the page identified below with the attached page. The revised page is identified by amendment number and contain a vertical line in the margin indicating the area of change.

<u>REMOVE</u> <u>INSERT</u> 3/4.6-7

PRIMARY SYSTEM BOUNDARY

Safety Valves 3/4.6.E

3.6 - LIMITING CONDITIONS FOR OPERATION

E. Safety Valves

Excluding the Target Rock valve, the safety valve function of the reactor coolant system safety valves shall be OPERABLE.

APPLICABILITY:

OPERATIONAL MODE(s) 1, 2 and 3.

ACTION:

- With the safety valve function of one or more of the above required safety valves inoperable, be in at least HOT SHUTDOWN within 12 hours and in COLD SHUTDOWN within the next 24 hours.
- 2. Deleted

4.6 - SURVEILLANCE REQUIREMENTS

E. Safety Valves

- 1. Deleted.
- 2. At least once per 18 months, 1/2 of the safety valves shall be removed, set pressure tested and reinstalled or replaced with spares that have been previously set pressure tested and stored in accordance with manufacturer's recommendations. At least once per 40 months, the safety valves shall be rotated such that all 8 safety valves are removed, set pressure tested and reinstalled or replaced with spares that have been previously set pressure tested and stored in accordance with manufacturer's recommendations.

Verify the safety function lift setpoints^(a) of the required safety valves are as follows:

2 safety valves @1240 psig ±1% 2 safety valves @1250 psig ±1% 4 safety valves @1260 psig ±1%

a The lift setting pressure shall correspond to ambient conditions of the valves at nominal operating temperatures and pressures



WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION RELATED TO AMENDMENT NO. 184 TO FACILITY OPERATING LICENSE NO. DPR-19 AND AMENDMENT NO. 179 TO FACILITY OPERATING LICENSE NO. DPR-25 EXELON GENERATION COMPANY, LLC DRESDEN NUCLEAR POWER STATION, UNITS 2 AND 3

DOCKET NOS. 50-237 AND 50-249

1.0 <u>INTRODUCTION</u>

By letter dated February 29, 2000, Commonwealth Edison Company (ComEd) proposed changes to the Technical Specifications (TS) for the Dresden Nuclear Power Station, Units 2 and 3. The proposed amendment would reduce the number of safety valves required for overpressure protection at Dresden, Unit 2, by removing from TS Section 3.6.E the safety valve function and setpoint of the Target Rock safety/relief valve (SRV). The proposed amendment would move the remaining safety valve lift pressure setpoints from TS Section 3.6.E to TS Section 4.6.E and change the number of required safety valves from nine to eight. The proposed amendment would also remove footnote "c" of Unit 3 TS Section 4.6.E since this footnote was only applicable to Unit 3, Cycle 15, (D3C15) which has been completed. By letter dated January 11, 2001, the licensee verified that they still wanted this amendment. The January 11, 2001, letter is within the scope of the original notice and does not change the staff's original no significant hazards consideration determination. The application and supplement were submitted by ComEd, which has since merged to form Exelon Generation Company, LLC (EGC, the licensee). By letter dated February 7, 2001, EGC assumed responsibility for all pending NRC actions that were requested by ComEd.

2.0 BACKGROUND

The Dresden Units have eight reactor coolant system (RCS) safety valves, four RCS relief valves, and one valve, manufactured by Target Rock, that serves as both a safety valve and as a relief valve. Transient analysis and design-basis documents for Dresden show that overpressure requirements are met with less than nine RCS safety valves. No credit is taken for the Target Rock SRV valve in the analysis used to meet the requirements of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code.

By Amendment Number 168 dated June 4, 1999, the Dresden, Unit 3, Target Rock SRV safety valve function was removed from TS and the Unit 3 safety valve lift pressure setpoints were moved from TS Section 3.6.E to TS Section 4.6.E. The staff is using that amendment as a precedent for approving this request.

3.0 **EVALUATION**

The staff verified that the Dresden, Unit 2, design-basis for RCS overpressure protection and accident analysis, which is described in Sections 5.2 and 15.2 of the Dresden Updated Final Safety Analysis Report (UFSAR), does not credit the safety valve function of the Target Rock SRV. If the safety valve function of the Target Rock SRV is removed from the TS, TS Sections 3.6.E and 4.6.E will continue to specify operability requirements for the other eight RCS safety valves. The eight safety valves still specified in TS Sections 3.6.E and 4.6.E will provide adequate protection for overpressure transients and accident conditions.

The licensee proposed to move the remaining RCS safety valve lift pressure setpoints from TS Section 3.6.E to TS Section 4.6.E. The safety valve lift pressure setpoints are verified by surveillance tests and are more correctly specified under the surveillance section, TS Section 4.6.E, rather than the limiting condition for operation section, TS Section 3.6.E. This relocation of the RCS safety valve lift pressure setpoints follows the format of the Improved Standard Technical Specifications, NUREG-1433. This administrative change to TS does not reduce requirements.

The licensee proposed to remove footnote "c" from Dresden, Unit 3, TS 4.6.E. Footnote "c" extended to 60 months the 40 month surveillance requirements of TS 4.6.E for D3C15 only. D3C15 was completed on January 30, 1999, therefore, this footnote is no longer applicable. Removing this expired footnote from TS is an administrative change that does not reduce requirements.

On the basis of the preceding information, the staff has determined that it is not necessary to include the safety valve function of the Target Rock SRV in TS. The staff has also determined that the RCS safety valve lift pressure setpoints are more correctly specified in TS Section 4.6.E and that footnote "c" has expired. There are no negative safety consequences associated with deleting the Target Rock SRV safety valve function, relocating the lift pressure setpoints, or deleting footnote "c." The staff thus concludes that it is acceptable to remove the safety valve function of the Target Rock SRV from TS, to relocate the RCS safety valve lift pressure setpoints within TS, and to remove footnote "c."

4.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Illinois State official was notified of the proposed issuance of the amendment. The State official had no comments.

5.0 ENVIRONMENTAL CONSIDERATION

The amendments change a requirement with respect to the installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20. The NRC staff has determined that the amendments involve no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has made a final finding that the amendments involve no significant hazards consideration, and there has been no public comment on such finding (66 FR 11055).

Accordingly, the amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendments.

6.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendments will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributor: L. Rossbach

Date: March 23, 2001