

August 16, 2001

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

SUBJECT: DRESDEN NUCLEAR POWER STATION, UNIT NOS. 2 AND 3 - ISSUANCE
OF AMENDMENT RE: MECHANICAL VACUUM PUMP TRIP
INSTRUMENTATION (TAC NOS. MB0037 AND MB0038)

Dear Mr. Kingsley:

The U.S. Nuclear Regulatory Commission (Commission) has issued the enclosed Amendment No. 186 to Facility Operating License No. DPR-19 and Amendment No. 181 to Facility Operating License No. DPR-25 for Dresden, Units 2 and 3. The amendments are in response to your application dated September 1, 2000.

Subsequent to the date of the original amendment request, Commonwealth Edison Company (ComEd) was merged into Exelon Generation Company, LLC (Exelon or licensee). By letter dated February 7, 2001, Exelon informed the NRC that it assumed responsibility for all pending NRC actions that were requested by ComEd.

The amendments add an additional Technical Specification (TS) section regarding mechanical vacuum pump trip instrumentation.

A copy of the Safety Evaluation is also enclosed. The Notice of Issuance will be included in the Commission's biweekly Federal Register 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. 186 to DPR-19
2. Amendment No. 181 to DPR-25
3. Safety Evaluation

cc w/encls: See next page

O. Kingsley
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Dresden Nuclear Power Station
Units 2 and 3

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Units 2 and 3

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 Lawrence W. Rossbach, Project Manager, Section 2
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cc w/encls: See next page

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PUBLIC PDIII-2 Reading AMendiola LRossbach OGC
 GHill (4) WBeckner CRosenberg JLamb ACRS
 MRing, RIII *See previous concurrence

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DATE	7/18/01	08/15 /01	07/25 /01	07/30/01	08/09/01	08/16/01

ACCESSION NO. ML011980499

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EXELON GENERATION COMPANY, LLC

DOCKET NO. 50-237

DRESDEN NUCLEAR POWER STATION, UNIT 2

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 186
License No. DPR-19

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by the Exelon Generation Company, LLC (the licensee) dated September 1, 2000, 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) Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No. 186, 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

/RA/

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: August 16, 2001

EXELON GENERATION COMPANY, LLC

DOCKET NO. 50-249

DRESDEN NUCLEAR POWER STATION, UNIT 3

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 181
License No. DPR-25

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by the Exelon Generation Company, LLC (the licensee) dated September 1, 2000, 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. Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No. 181, 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

/RA/

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: August 16, 2001

ATTACHMENT TO LICENSE AMENDMENT NOS. 186 AND 181

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

DOCKET NOS. 50-237 AND 50-249

Revise the Appendix A Technical Specifications by removing the pages identified below and inserting the attached pages. The area of change on the Table of Contents page is identified by a change bar in the margin. The other pages are new pages.

REMOVE

Table of Contents i

N/A
N/A
N/A
N/A
N/A
N/A
N/A
N/A
N/A
N/A

INSERT

Table of Contents i

3.3.7.2-1
3.3.7.2-2
3.3.7.2-3
B 3.3.7.2-1
B 3.3.7.2-2
B 3.3.7.2-3
B 3.3.7.2-4
B 3.3.7.2-5
B 3.3.7.2-6
B 3.3.7.2-7

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 186 TO FACILITY OPERATING LICENSE NO. DPR-19
AND AMENDMENT NO. 181 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 INTRODUCTION

By letter dated September 1, 2000, Commonwealth Edison Company (ComEd) requested a license amendment to add a new Technical Specification (TS) section 3.3.7.2, "Mechanical Vacuum Pump Trip Instrumentation," for the main steam line radiation monitor (MSLRM) trip of the mechanical vacuum pump (MVP). The original application was submitted by ComEd, which merged to form Exelon Generation Company, LLC (EGC). By letter dated February 7, 2001, EGC (the licensee) assumed responsibility for all pending Nuclear Regulatory Commission (NRC) actions that were requested by ComEd.

2.0 BACKGROUND

In Amendment 163 for license DPR-19 and Amendment 158 for DPR-25 dated October 24, 1997, the MSLRM-high scram and the main steam line tunnel radiation-high input to the main steam line isolation function were removed from the TS. In addition to the changes mentioned above, two license conditions were added to ensure procedural requirements for manual isolation of the MVP and MSLRM alarm setpoints were established. The licensee evaluation performed assumed that the unit was at full power with the MVP isolated. Subsequent licensee analysis performed to support Improved Standard Technical Specifications (ISTS) implementation identified that during start-up, the MVP would not be isolated and that the thyroid dose to the main control room operator becomes the limiting factor during a control rod drop accident (CRDA).

Title 10 of the Code of Federal Regulation (10 CFR) 50.36(c)(2)(ii), criterion 3, requires that a structure, system, or component that is part of the primary success path and which functions or actuates to mitigate a design basis accident or transient that either assumes the failure of or presents a challenge to the integrity of a fission product barrier must be addressed by a TS limiting condition of operation (LCO).

Based on the requirements of 10 CFR 50.36, the licensee has identified that the control of the automatic trip of the MVP based upon input from the MSLRM needs to be incorporated into the TS.

3.0 EVALUATION

The licensee proposed the following changes:

- a. TS page v, "Table of Contents" - add new section 3/4.2.K, "Mechanical Vacuum Pump Isolation Instrumentation."
- b. TS pages 3/4.2-53 and B 3/4.2-5, "Instrumentation" - this change identifies LCO and surveillance requirements (SRs) for the automatic trip of the MVP based upon input from the MSLRM.
- c. Improved technical specification (ITS) Pages 3.3.7.2-1 and B 3.3.7.2-1, "Instrumentation" - add ITS 3.3.7.2, "Mechanical Vacuum Pump Trip Instrumentation" - this change identifies LCO and surveillance requirements (SRs) for the automatic trip of the MVP based upon input from the MSLRM.

By letter dated March 21, 2001, the licensee's ITS conversion was approved; therefore, the licensee's proposed changes regarding their old custom TSs will not be addressed in this safety evaluation.

The licensee proposed new TS section 3.3.7.2, "Mechanical Vacuum Pump Trip Instrumentation," for the MSLRM function to trip the condenser MVP. The proposed TS requires four channels of MSLRM high-radiation trip function to be operable in Modes 1 and 2 when a condenser MVP is in-service and the Main Steam Lines (MSLs) are not isolated. If one or more channels are inoperable, the proposed TS requires, within 1 hour, verification that sufficient channels remain operable to maintain trip capability, and within 12 hours to restore the inoperable channel(s) to operable status or place the inoperable channel(s) or associated trip system(s) in trip, or within 12 hours take the plant out of the range of applicability (e.g., MVP tripped, MSLs isolated, or plant in Mode 3). The proposed TS also allows entry into the action statements to be delayed for up to 6 hours for the performance of surveillance, provided MVP pump trip capability is maintained. The proposed SRs include a channel check at least once per 12 hours, a channel functional test at least once per 31 days, and a channel calibration and a logic system functional test at least once per 24 months.

The NRC staff finds that the proposed TS 3.3.7.2, "Mechanical Vacuum Pump Trip Instrumentation," is in conformance with General Electric Topical Report NEDC-30851P-A, Supplement 2, "Technical Specification Improvement Analysis for BWR Isolation Instrumentation Common to RPS and ECCS Instrumentation," which was approved by the NRC staff, dated January 6, 1989. Therefore, the NRC staff finds the proposed TS 3.3.7.2, "Mechanical Vacuum Pump Trip Instrumentation," to be acceptable.

4.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Illinois State official was notified of the proposed issuance of the amendments. 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 previously issued a proposed finding that the amendments involve no significant hazards consideration, and there has been no public comment on such finding (66 FR 11058). 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: J. Lamb

Date: August 16, 2001