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MAY 16 1975

Docket Nos. 50-237
and 50-249

Commonwealth Edison Company
ATTN: Mr. J. S. Abel
Nuclear Licensing Administrator -
Boiling Water Reactors
Post Office Box 767
Chicago, Illinois 60690

Gentlemen:

The Commission has issued the enclosed Amendment Nos. 8 and 6 to Facility License Nos. DPR-19 and DPR-25 for Units 2 and 3 of the Dresden Nuclear Power Station, respectively. These amendments include Changes 34 and 23 to the Technical Specifications and are in response to Commonwealth Edison's request dated November 4, 1974.

These amendments add requirements for flood protection equipment and performance requirements for containment cooling service water pumps.

Copies of the related Safety Evaluation and the Federal Register Notice also are enclosed.

Sincerely,

Original signed by
Dennis L. Ziemann

Dennis L. Ziemann, Chief
Operating Reactors Branch #2
Division of Reactor Licensing

Enclosures:
1. Amendment Nos. 8 and 6
w/Change Nos. 34 and 23
2. Safety Evaluation
3. Federal Register Notice

cc w/enclosures:
See next page

CP (1)

See 50-237 for concurrences

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Grundy County Courthouse
Morris, Illinois 60450

Mr. Leroy Stratton
Bureau of Radiological Health
Illinois Department of Public Health
Springfield, Illinois 62706

Mr. Gary Williams
Federal Activities Branch
Environmental Protection Agency
1 N. Wacker Drive, Room 822
Chicago, Illinois 60606

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COMMONWEALTH EDISON COMPANY

DOCKET NO. 50-249

(DRESDEN UNIT 3)

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 6
License No. DPR-25

1. The Nuclear Regulatory Commission (the Commission) has found that:

   A. The application for amendment by the Commonwealth Edison Company (the licensee) dated November 4, 1974, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended, 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; and

   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.

2. Accordingly, the license is amended by a change to the Technical Specifications as indicated in the attachment to this license amendment and Paragraph 3.B of Facility License No. DPR-25 is hereby amended to read as follows:

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"B. Technical Specifications

The Technical Specifications contained in Appendix A, as revised, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications, as revised by issued changes thereto through Change No. 24."

3. This license amendment is effective as of the date of its issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

original signed by R. Boyd

A. Giambusso, Director
Division of Reactor Licensing
Office of Nuclear Reactor Regulation

Attachment:
Change No. 23 to the
Technical Specifications

Date of Issuance: MAY 16 1975

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ATTACHMENT TO LICENSE AMENDMENT NO. 6

CHANGE NO. 23 TO THE TECHNICAL SPECIFICATIONS

FACILITY OPERATING LICENSE NO. DPR-25

DOCKET NO. 50-249

The following change applies to Dresden Unit 3, License No. DPR-25:

Delete existing pages 76, 85B, 86 and 86A and insert the attached pages 76, 81D, 81E, 85B, 86, 86A, 86B and 86C. Changed areas on the revised pages are indicated by marginal lines.

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3.5 LIMITING CONDITION FOR OPERATION	4.5 SURVEILLANCE REQUIREMENT
B. Containment Cooling Subsystem	B. Surveillance of the Containment Cooling Subsystem shall be performed as follows:
1. Except as specified in 3.5.B.2, 3.5.B.3, and 3.5.F.3 below, both containment cooling subsystem loops shall be operable whenever irradiated fuel is in the reactor vessel and reactor coolant temperature is greater than 212°F.	1. Containment Cooling Service Water Subsystem Testing: Item — Frequency a. Pump & Valve Operability — Once/3 months b. Flow Rate Test Each containment cooling water pump shall deliver at least 3500 gpm against a pressure of 180 psig. — After pump maintenance and every 3 months 23
2. From and after the date that one of the containment cooling service water subsystem pumps is made or found to be inoperable for any reason, reactor operation is permissible only during the succeeding thirty days unless such pump is sooner made operable, provided that during such thirty days all other active components of the containment cooling subsystem are operable.	2. When it is determined that one containment cooling service water pump is inoperable, the remaining components of that subsystem and the other containment cooling subsystem shall be demonstrated to be operable immediately and daily thereafter.
3. From and after the date that one containment cooling subsystem is made or found to be inoperable for any reason, reactor operation is permissible only during the succeeding seven days unless such subsystem is sooner made operable, provided that all active components of the other	3. When one containment cooling subsystem becomes inoperable, the operable subsystem and the diesel generators required for operation of such components shall be demonstrated to be operable immediately and the operable containment cooling subsystem daily thereafter.

K. Condensate Pump Room Flood Protection

1. The systems installed to prevent or mitigate the consequences of flooding of the condensate pump room shall be operable prior to startup of the reactor. 23

2. The condenser pit water level switches shall trip the condenser circulating water pumps and alarm in the control room if water level in the condenser pit exceeds a level of 5 feet above the pit floor. If a failure occurs in one of these trip and alarm circuits, the failed circuit shall be immediately placed in a trip condition and reactor operation shall be permissible for the following seven days unless the circuit is sooner made operable.

K. Condensate Pump Room Flood Protection

1. The following surveillance requirements shall be observed to assure that the condensate pump room flood protection is operable. 23

   a. The testable penetrations through the walls of CCSW pump vaults shall be checked during each operating cycle by pressurizing to 15 ± 2 psig and checking for leaks using a soap bubble solution. The criteria for acceptance should be no visible leakage through the soap bubble solution. The bulkhead door shall be checked during each operating cycle by hydrostatically testing the door at 15 ± 2 psig and checking to verify that leakage around the door is less than one gallon per hour.

3.5 LIMITING CONDITION FOR OPERATION	4.5 SURVEILLANCE REQUIREMENT
23 3. If Specification 3.5.K.1 and 2 cannot be met, reactor startup shall not commence or if operating, an orderly shutdown shall be initiated and the reactor shall be in a cold shutdown condition within 24 hours.	23 b. The CCSW Vault Floor drain shall be checked during each operating cycle by assuring that water can be run through the drain line and actuating the air operated valves by operation of the following sensor: i. loss of air ii. high level in the condensate pump room (5'0") c. The condenser pit 5 foot trip circuits for each channel shall be checked once a month. A logic system functional test shall be performed during each refueling outage.

in axial gaps between core bottom and top, and assures with a 95% confidence, that no more than one fuel rod exceeds the design linear heat generation rate due to power spiking. An irradiated growth factor of 0.25% was used as the basis for determining $\Delta P/P$ in accordance with General Electric Development and Planning Memorandum #45, "Length Growth of BWR Fuel Elements," R. A. Proebsthe, October 1, 1973 and U.S. Atomic Energy Commission report, "Supplement 1 to the Technical Report on Densification of General Electric Reactor Fuels," December 14, 1973.

3.5.K Flood Protection

23 Condensate pump room flood protection will assure the availability of the containment cooling service water system (CCSW) during a postulated incident of flooding in the turbine building. The redundant level switches in the condenser pit will preclude any postulated flooding of the turbine building to an elevation above river water level. The level switches provide alarm and circulating water pump trip in the event a water level is detected in the condenser pit.

(Cont'd)

4.5 Surveillance Requirement Bases

4.5.I & J Average and Local LHGR

The LHGR shall be checked daily to determine if fuel burnup or control rod movement has caused changes in power distribution. Since changes due to burnup are slow, and only a few control rods are moved daily, a daily check of power distribution is adequate.

4.5.K Flood Protection

23 The watertight bulkhead door and the penetration seals for pipes and cables penetrating the vault walls have been designed to withstand the maximum flood conditions. To assure that their installation is adequate for maximum flood conditions, a method of testing each seal has been devised.

To test a pipe seal, another test seal is installed in the opposite side of the penetration creating a space between the two seals that can be pressurized. Compressed air is then supplied to a fitting on the test seal and the space inside the sleeve is pressurized to approximately 15 psi. The outer face of the permanent seal is then tested for leaks using a soap bubble solution.

On completion of the test, the test seal is removed for use on other pipes and penetrations of the same size.

In order to test the watertight bulkhead doors, a test frame must be installed around each door. At the time of the test, a reinforced steel box with rubber gasketing is clamped to the wall around the 23 door. The fixture is then pressurized to approximately 15 psig to test for leaktightness.

Floor drainage of each vault is accomplished through a carbon steel pipe which penetrates the vault. When open, this pipe will drain the vault floor to a floor drain sump in the condensate pump room.

Equipment drainage from the vault coolers and the CCSW pump bedplates will also be routed to the vault floor drains. The old equipment drain pipes will be permanently capped preclude the possibility of back-flooding the vault.

(Cont'd)

4.5 Surveillance Requirement Bases

23 As a means of preventing backflow from outside the vaults in the event of a flood, a check valve and an air operated valve are installed in the 2" vault floor drain line 6'0" above the floor of the condensate pump room.

The check valve is a 2" swing check designed for 125 psig service. The air operated valve is a control valve designed for a 50 psi differential pressure. The control valve will be in the normally open position in the energized condition and will close upon any one of the following:

Loss of air or power

High level (5'0") in the condensate pump room

Closure of the air operated valve on high water level in the condensate pump room is effected by use of a level switch set at a water level of 5'0". Upon actuation, the switch will close the control valve and alarm in the control room.

23 The operator will also be aware of problems in the vaults/condensate pump room if the high level alarm on the equipment drain sump is not terminated in a reasonable amount of time. If must be pointed out that these alarms provide information to the operator but that operator action upon the above alarms is not a necessity for reactor safety since the other provisions provide adequate protection.

A system of level switches has been installed in the condenser pit to indicate and control flooding of the condenser area. The following switches are installed:

	Level	Function
a.	1'0" (1 switch)	Alarm, Panel Hi-Water Condenser Pit
b.	3'0" (1 switch)	Alarm, Panel High-Circ. Water Condenser Pit
c.	5'0" (2 redundant switch pairs)	Alarm and Circ. Water Pump Trip

Level (a) indicates water in the condenser pit from either the hotwell or the circulating water system. Level (b) is above the hotwell capacity and indicates a probable circulating water failure.

Should the switches at level (a) and (b) fail or the operator fail to trip the circulating water pumps on alarm at level (b), the actuation of either level switch pair at level (c) shall trip the circulating water pumps automatically and alarm in the control room. These redundant level switch pairs at level (c) are designed and installed to IEEE-279, "Criteria for Nuclear Power Plant Protection Systems." As the circulating water pumps are tripped, either manually or automatically, at level (c) of 5'0", the maximum water level reached in the condenser pit due to pumping will be at the 491'0" elevation (10' above condenser pit floor elevation 481'0"; 5' plus an additional 5' attributed to pump coastdown).

23

In order to prevent overheating of the CCSW pump motors, a vault cooler is supplied for each pump. Each vault cooler is designed to maintain the vault at a maximum 105°F temperature during operation of its respective pump. For example, if CCSW pump 2B-1501 starts, its cooler will also start and compensate for the heat supplied to the vault by the 28 pump motor keeping the vault at less than 105°F.

Each of the coolers is supplied with cooling water from its respective pump's discharge line. After the water has been passed through the cooler, it returns to its respective pump's suction line. In this way, the vault coolers are supplied with cooling water totally inside the vault. The cooling water quantity needed for each cooler is approximately 1% to 5% of the design flow of the pumps so that the recirculation of this small amount of heated water will not affect pump or cooler operation.

23

Operation of the fans and coolers is required during pump operability testing and thus additional surveillance is not required.

Verification that access doors to each vault are closed, following entrance by personnel, is covered by station operating procedures.

Bases:

4.5.A.-4.5.F.

The testing interval for the core and containment cooling systems is based on quantitative reliability analysis, judgement and practicality. The core cooling systems have not been designed to be fully testable during operation. For example the core spray final admission valves do not open until reactor pressure has fallen to 350 psig thus during operation even if high drywell pressure were simulated the final valves would not open. In the case of the HPCI, automatic initiation during power operation would result in pumping cold water into the reactor vessel which is not desirable.

The systems can be automatically actuated during a refueling outage and this will be done. To increase the availability of the individual components of the core and containment cooling systems the components which make up the system; i.e., instrumentation, pumps, valve operators, etc., are tested more frequently. The instrumentation is functionally tested each month. Likewise the pumps and motor-operated valves are also tested each month to assure their operability. The combination of a yearly simulated automatic actuation test and monthly tests of the pumps and valve operators is deemed to be adequate testing of these systems.

With components or subsystems out-of-service overall core and containment cooling reliability is maintained by demonstrating the operability of the remaining cooling equipment. The degree of operability to be demonstrated depends on the nature of the reason for the out-of-service equipment. For routine out-of-service periods caused by preventative maintenance, etc., the pump and valve operability checks will be performed to demonstrate operability of the remaining components. However, if a failure, design deficiency, etc., caused the out-of-service period, then the demonstration of operability should be thorough enough to assure that a similar problem does not exist on the remaining components. For example, if an out-of-service period were caused by failure of a pump to deliver rated capacity due to a design deficiency, the other pumps of this type might be subjected to a flow rate test in addition to the operability checks.

23 The requirement of 180 psig at 3500 gpm at the containment cooling service water (CCSW) pump discharge provides adequate margin to ensure that the LPCI/CCSW system provides the design bases cooling water flow and maintains 20 psig differential pressure at the containment cooling heat exchanger. This differential pressure preclude reactor coolant from entering the river water side of the containment cooling heat exchangers.

H. Maintenance of Filled Discharge Pipe

The surveillance requirements to assure that the discharge piping of the core spray, LPCI, and HPCI systems are filled provides for a visual observation that water flows from a high point vent. This ensures that the line is in a full condition. Between the monthly intervals at which the lines are vented, instrumentation has been provided to monitor the presence of water in the discharge piping. This instrumentation will be calibrated on the same frequency as the safety system instrumentation. This period of periodic testing ensures that during the interval between the monthly checks the status of the discharge piping is monitored on a continuous basis.

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

SUPPORTING AMENDMENT NOS. 8 AND 6 TO LICENSE NOS. DPR-19 AND DPR-25

CHANGE NOS. 34 AND 23 TO TECHNICAL SPECIFICATIONS

COMMONWEALTH EDISON COMPANY

DOCKET NOS. 50-237 AND 50-249

INTRODUCTION

By letter dated November 4, 1974, Commonwealth Edison (CE) requested changes to the Technical Specifications appended to Facility Operating License Nos. DPR-19 and DPR-25 for Dresden Nuclear Power Station Units 2 and 3. The proposed changes involve:

1. Adding new Sections 3.5.k and 4.5.k specifying limiting conditions for operation and surveillance requirements for condensate pump room flood protection.

2. Changing the requirements for the containment cooling service water (CCSW) pump flow rate testing (Section 4.5.B.1.b).

The added requirements for condensate room flood protection complete our review of the vulnerability of safety related equipment to flooding caused by rupture of cooling systems. This report includes our evaluation of flooding protection as well as evaluation of the proposed technical specification.

DISCUSSION

1. Flooding of Safety Related Equipment

In some facilities, rupture of non-safety grade system components could have resulted in flooding of equipment important to safety. This could have impaired the capability to safely shut down the plant. On August 3, 1972, we asked CE to review the Dresden facilities for vulnerability to flooding and propose corrective actions if necessary. In subsequent

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correspondence,[1,2&3] CE identified several vulnerable components and proposed interim and permanent corrective measures. The vulnerable components at Dresden 2 and 3 were the four containment cooling service water pumps and the three diesel generator cooling water pumps. The measures taken to eliminate the problem are discussed below:

A. Containment Cooling Service Water Pumps

The containment cooling service water (CCSW) pumps for Dresden 2 and 3 are located in a room above the condensate pump room of each respective unit. The room containing the CCSW pumps and the condensate pump room below it are both adjacent to the condenser pit. These three areas are all located below the turbine building ground floor. A rupture of a circulating water pipe in the condenser pit could have caused flooding of the condensate pump room adjacent to the pit and the CCSW pumps above the condensate pump room. Continued operation of the recirculating water pumps after a circulating water line break in the condenser pit could have caused flooding of the condenser pit up to the ground floor and could have caused overflow from the ground floor into the CCSW pump room. If flooding of the CCSW pumps occurred they would be rendered inoperable.

To prevent potential flooding of the CCSW pumps from a circulating water pipe break, CE took several corrective actions. As an interim measure, CE installed temporary water tight closures between the condenser pit and the condensate pump room. They also installed water level switches in the condenser pit with alarm trips and circulating water pump trips. These trips allowed manually initiated or automatically initiated shutoff of the circulating water pumps in sufficient time to prevent filling of the condenser pit and overflow onto the ground floor.

CE also evaluated the potential flooding resulting from a break in a Class I or Class II pipe located in the condensate pump room. The CE evaluation indicated that a Class II system failure in the condensate pump room would not cause flooding of the CCSW pumps. However, failure of a Class I pipe located in the condensate pump

1. Letter from L. D. Butterfield, Commonwealth Edison Company to Donald J. Skovholt, USAEC, Dockets 50-10, 50-237, and 50-249, October 13, 1972.
2. Letter from L. D. Butterfield, Commonwealth Edison Company to D. L. Ziemann, USAEC, Docket Nos. 50-10, 50-237 and 50-249, July 12, 1973.
3. Letter from J. S. Abel, Commonwealth Edison Company to D. L. Ziemann, USAEC, Docket Nos. 50-237 and 50-249, August 30, 1973.

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room could have flooded the room and the CCSW pumps above the room if no corrective action were taken. To prevent such flooding, CE installed water level switches which would cause an alarm in the control room if the room was flooded. The alarms provided sufficient warning to operating personnel to allow shutting down the reactor and valving out the failed lines.

The permanent modifications included sealing of the condenser pit from the condensate pump room and enclosing two of the four CCSW pumps of each reactor with watertight walls. The watertight walls assure that a pipe break in the CCSW system could not flood more than two of the four pumps. Two CCSW pumps provide adequate cooling capacity. All seals and barriers installed to prevent flooding of CCSW pumps were designed to withstand simultaneous loads from water pressure and seismic occurrences (design basis earthquake).

A permanent water level switch system was installed to limit the amount of water pumped through a recirculating line break in the condenser pit. The system includes switches at 3 different elevations. Activation of switches at any of the elevations causes alarms in the control room and provides warning for appropriate manually initiated action. Activation of the highest level switches (5 ft. level) also automatically shuts off the circulating water pumps in sufficient time to prevent overflow from the condenser pit. The switches at the five ft. elevation are designed and installed to the requirements of the Electrical and Electronics Engineers Criterion for Nuclear Power Plant Protection Systems (IEEE-279). We have concluded that the seals, barriers and water level trips installed as described by CE provide acceptable assurance that the CCSW system will not be rendered inoperable because of flooding.

B. <u>Diesel Generator Cooling Water Pumps</u>

The three diesel generator cooling water pumps are located in the cribhouse. A break in a cooling water line in this area could have flooded the pumps and rendered them inoperable. As a temporary measure, CE installed water level alarms and made available a manual hose intertie from the fire water system to the cooling water supply of the Dresden 2/3 diesel generator, the generator which can supply power to either unit.

The permanent modification involved replacing the pumps with submersible type pumps and submersible electrical feed conduit. This modification eliminated the vulnerability of the pumps to failure from flooding.

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Based on our review of CE's evaluation we can identify no components other than those discussed in A. and B. above which require flood protection. We conclude that the modifications discussed in A. and B. above provide acceptable corrective action to prevent failure of critical equipment from flooding resulting from a pipe break.

2. Condensate Pump Room Flood Protection, Sections 3.5.k and 4.5.k

The modifications to prevent failure of the CCSW pumps include water level switches and watertight vaults. The vaults are penetrated by testable sealed penetrations, a bulkhead door and a floor drain. Sections 3.5.k and 4.5.k specify the operability and surveillance requirements for the level switches and vault penetrations. Section 3.5.k requires that the installed systems be operable or that the reactor be placed in a shutdown condition. It also requires that the condenser pit water level trip and alarm setpoint be no more than five feet above the pit floor level. The trip level at five feet assures that the water elevation, reached by circulating water pump coastdown following a trip, would not reach a high enough level to overflow into the CCSW area. We consider the proposed limiting conditions of operation provide acceptable assurance that the CCSW system will be protected from flooding resulting from a pipe break.

The surveillance specifications, Section 4.5.k, require testing for the leak tightness of testable vault penetrations and the bulkhead door each operating cycle. The specifications also require testing of the vault floor drain and drain valve operability each cycle, a test of the level trip circuit once a month and a logic system functional test of the level trips each refueling outage. We consider the proposed surveillance requirements acceptable to provide a high degree of assurance that the flood protection equipment is operable.

3. Containment Cooling Service Water Subsystem Testing, Section 4.5.B.1.b

The existing Technical Specifications require that each containment cooling service water pump shall deliver at least 3500 gpm against a pressure of 198 psig. The proposed specification reduces the pressure requirement from 198 psig to 180 psig. The CCSW pump discharge pressure requirement at a flow of 3500 gpm is set to provide adequate margin to:

(a) ensure that the combined low pressure coolant injection (LPCI) - CCSW system provides the design bases cooling water flow rate, and

(b) maintain sufficient differential pressure at the containment cooling heat exchangers to preclude reactor coolant from entering the river water side of these heat exchangers.

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The 198 psig requirement was based on the analyses used to design the system. The 180 psig requirement is based on actual operating parameters. The analysis submitted by CE shows that the change does not decrease the expected margin of safety nor does it reduce the design capability of the pumps. Based on our evaluation of the CE analysis we agree with CE's conclusion. Since the design margin of safety and design system capability are not altered, we consider the revised pressure requirement acceptable.

CONCLUSION

We have 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, and (2) such activities will be conducted in compliance with the Commission's regulations and the issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public.

Date: MAY 16 1975

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UNITED STATES NUCLEAR REGULATORY COMMISSION

DOCKET NOS. 50-237 AND 50-249

COMMONWEALTH EDISON COMPANY

NOTICE OF ISSUANCE OF AMENDMENTS TO FACILITY LICENSES

Notice is hereby given that the U. S. Nuclear Regulatory Commission (the Commission) has issued Amendment Nos. 8 and 6 to Facility Operating License Nos. DPR-19 and DPR-25 (respectively) to the Commonwealth Edison Company (the licensee) which revised Technical Specifications for operation of the Dresden Nuclear Power Station Units 2 and 3 (the facilities) located in Grundy County, Illinois. The license amendments are effective as of their date of issuance.

The license amendments revised the Technical Specifications for the facilities to incorporate appropriate requirements for flood protection equipment and to include a change to the performance requirements for the containment cooling service water pumps in accordance with the licensee's request dated November 4, 1974.

The application for the amendments complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations. The Commission has made appropriate findings as required by the Act and the Commission's rules and regulations in 10 CFR Chapter I, which are set forth in the license amendments. Notice of Proposed Issuance of Amendments to Facility Operating Licenses in connection with this action was published in the Federal Register on January 28, 1975 (40 F.R. 4194). No request for a hearing or petition for leave to intervene was filed following notice of the proposed action.

For further details with respect to these actions, see (1) the application for amendments dated November 4, 1974, (2) Amendment Nos. 8 and 6 to License Nos. DPR-19 and DPR-25, with Change Nos. 34 and 23, respectively, and (3) the Commission's concurrently issued related Safety Evaluation. All of these items are available for public inspection at the Commission's Public Document Room, 1717 H Street, N. W., Washington, D. C., and at the Morris Public Library at 604 Liberty Street in Morris, Illinois 60451. A copy of items (2) and (3) may be obtained upon request addressed to the U. S. Nuclear Regulatory Commission, Washington, D. C. 20555, Attention: Director, Division of Reactor Licensing.

Dated at Bethesda, Maryland, this 16th day of May 1975.

FOR THE NUCLEAR REGULATORY COMMISSION

Original signed by
Dennis L. Ziemann

Dennis L. Ziemann, Chief
Operating Reactors Branch #2
Division of Reactor Licensing

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