

June 4, 1999

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

SUBJECT: ISSUANCE OF AMENDMENT (TAC NO. MA5385)

Dear Mr. Kingsley:

The U.S. Nuclear Regulatory Commission (NRC, the Commission) has issued the enclosed Amendment No. 168 to Facility Operating License No. DPR-25 for Dresden Nuclear Power Station, Unit 3. The amendment is in response to your application dated May 5, 1999.

The amendment changes Technical Specifications (TS) by removing the safety valve function of the Target Rock safety/relief valve from TS Section 3.6.E and moving the safety valve lift pressure setpoints from TS Section 3.6.E to TS Section 4.6.E.

This request for amendment was submitted under exigent circumstances in accordance with NRC Administrative Letter 95-05, Revision 1, "Revisions to Staff Guidance for Implementing NRC Policy on Notices of Enforcement Discretion." This amendment supersedes Notice of Enforcement Discretion (NOED) 99-6-004 which is documented in NRC letter dated May 6, 1999. NOED 99-6-004 was issued to prevent undue shutdown or derate of Dresden, Unit 3, due to the safety valve function of the Target Rock safety/relief valve becoming inoperable on May 3, 1999.

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,

Original Signed By
Lawrence W. Rossbach, Project Manager, Section 2
Project Directorate III
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

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Docket No. 50-249

Enclosures: 1. Amendment No. 168 to DPR-25
2. Safety Evaluation

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*Do not sign until after
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**O. Kingsley
Commonwealth Edison Company**

cc:

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**UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001**

COMMONWEALTH EDISON COMPANY

DOCKET NO. 50-249

DRESDEN NUCLEAR POWER STATION, UNIT 3

AMENDMENT TO FACILITY OPERATING LICENSE

**Amendment No. 168
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 May 5, 1999, 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:

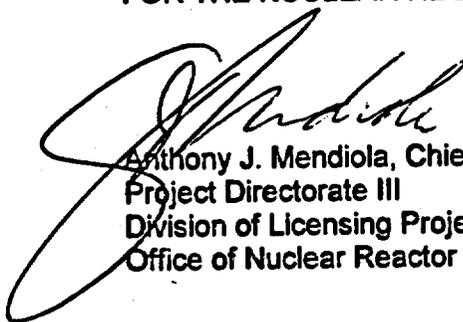
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B. Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No. 168 , 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: June 4, 1999

ATTACHMENT TO LICENSE AMENDMENT NO. 168

FACILITY OPERATING LICENSE NO. DPR-25

DOCKET NO. 50-249

Revise the Appendix A Technical Specifications by removing the pages identified below and inserting the attached pages. The revised pages are identified by the captioned amendment number and contain marginal lines indicating the area of change.

REMOVE

3/4.6-7

INSERT

**3/4.6-7 Unit 2 Amendment 150
3/4.6-7 Unit 3 Amendment**

3.6 - LIMITING CONDITIONS FOR OPERATION

E. Safety Valves

The safety valve function of the 9 reactor coolant system safety valves shall be OPERABLE in accordance with the specified code safety valve function lift settings^(a) established as:

- 1 safety valve^(b) @1135 psig $\pm 1\%$
- 2 safety valves @1240 psig $\pm 1\%$
- 2 safety valves @1250 psig $\pm 1\%$
- 4 safety valves @1260 psig $\pm 1\%$

APPLICABILITY:

OPERATIONAL MODE(s) 1, 2 and 3.

ACTION:

1. 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 9 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.

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

b Target Rock combination safety/relief valve.

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:

1. 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^(c), the safety valves shall be rotated such that all 9 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:

- 1 safety valve^(b)@1135 psig ± 1%
- 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

b Target Rock combination safety/relief valve.

c The surveillance interval has been extended to 60 months for Unit 3, Cycle 15 only, and the provisions of Specification 4.0.B are not applicable to the 60-month interval.



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 168 TO FACILITY OPERATING LICENSE NO. DPR-25
COMMONWEALTH EDISON COMPANY
DRESDEN NUCLEAR POWER STATION, UNIT 3

DOCKET NO. 50-249

1.0 INTRODUCTION

By letter dated May 5, 1999, Commonwealth Edison Company (ComEd, the licensee) proposed changes to the Technical Specifications (TS) for the Dresden Nuclear Power Station, Unit 3. The proposed changes would remove the safety valve function of the Target Rock safety/relief valve (SRV) from TS Section 3.6.E and move the reactor coolant system (RCS) safety valve lift pressure setpoints from TS Section 3.6.E to TS Section 4.6.E.

This request for amendment was submitted under exigent circumstances in accordance with NRC Administrative Letter 95-05, Revision 1, "Revisions to Staff Guidance for Implementing NRC Policy on Notices of Enforcement Discretion." The requested amendment will supersede Notice of Enforcement Discretion (NOED) 99-6-004 which is documented in NRC letter dated May 6, 1999. NOED 99-6-004 was issued in response to ComEd's letters dated May 4 and 6, 1999, requesting enforcement discretion to prevent undue shutdown or derate of Dresden, Unit 3, due to the safety valve function of the Unit 3 Target Rock SRV valve becoming inoperable on May 3, 1999.

2.0 BACKGROUND

On May 3, 1999, an annunciator in the Dresden, Unit 3, control room indicated a possible pilot valve bellows failure for the Target Rock safety/relief valve (SRV). Dresden, Unit 3, has 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. Thus, both TS Section 3/4.6.E concerning RCS safety valves and TS Section 3/4.6.F concerning relief valves govern the operability of the Target Rock SRV. The pilot valve bellows is associated with the safety valve function of the Target Rock SRV but does not prevent it from functioning as a relief valve. Therefore, the licensee entered the action statement in TS Section 3.6.E which requires that the unit be placed in hot shutdown within 12 hours and in cold shutdown within 24 hours of any of the nine RCS safety valves becoming inoperable.

Transient analysis and design basis documents for Dresden, Unit 3, show that overpressure requirements are met with less than nine RCS safety valves. Although the Target Rock SRV is required to be operable by TS, no credit is taken for this valve in the analysis used to meet the requirements of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code. To prevent an unnecessary shutdown ComEd requested and was granted NOED 99-6-004.

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3.0 EVALUATION

The staff verified that the Dresden, Unit 3, 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 Section 3.6.E will continue to specify operability requirements for the other eight RCS safety valves. The eight safety valves still specified in TS Section 3.6.E will provide adequate protection for overpressure transients and accident conditions.

The licensee has also proposed to move the 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.

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 and that the RCS safety valve lift pressure setpoints are more correctly specified in TS Section 4.6.E. There are no negative safety consequences associated with deleting the Target Rock SRV safety valve function or with relocating the lift pressure setpoints. The staff thus concludes that it is acceptable to remove the safety valve function of the Target Rock SRV from TS and to relocate the RCS safety valve lift pressure setpoints within TS.

4.0 EXIGENT CIRCUMSTANCES

In its May 5, 1999, application, the licensee requested that this amendment be treated as an exigent amendment. In accordance with 10 CFR 50.91(a)(6), the licensee provided the following information regarding why this exigent situation occurred and how it could not have been avoided.

The need for a NOED and a subsequent license amendment request was determined upon the recent potential failure of the safety mode of the Target Rock SRV on May 3, 1999. ComEd had no prior knowledge of this failure and discovered during a review of licensing and design bases that credit for the safety mode of the Target Rock SRV was not used in the evaluation of any design basis accidents or transients. Submittal of this amendment request is consistent with the guidance provided in NRC Administrative Letter 95-05, Revision 1 for NOEDs that are granted which also require a license amendment. ComEd believes that the circumstances surrounding the request for exigent review were unavoidable and were not created by a failure to make a timely application for a license amendment.

The staff concludes that an exigent condition exists in that failure to act in a timely way would result in an undue shutdown or derate of Dresden, Unit 3. In addition, the staff concludes that the licensee made a timely application for the amendment and did not cause the exigent situation. Thus, the conditions needed to satisfy 10 CFR 50.91(a)(6) exist, and the amendment is being processed on an exigent basis.

5.0 FINAL NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

The Commission's regulations in 10 CFR 50.92(c) state that the Commission may make a final determination that a license amendment involves no significant hazards consideration if operation of the facility in accordance with the amendment would not: (1) involve a significant increase in the probability or consequences of an accident previously evaluated, or (2) create the possibility of a new or different kind of accident from any previously evaluated, or (3) involve a significant reduction in a margin of safety.

The proposed changes do not involve a significant hazards consideration because operation of Dresden, Unit 3, in accordance with the proposed changes would not:

- (1) Involve a significant increase in the probability or consequences of an accident previously evaluated:

The probability of an evaluated accident is derived from the probabilities of the individual precursors to that accident. The consequences of an evaluated accident are determined by the operability of plant systems designed to mitigate those consequences. Limits have been established consistent with NRC-approved methods to ensure that fuel performance during normal, transient, and accident conditions is acceptable. The proposed change to permit operation with the Target Rock safety/relief valve (SRV) safety function out of service (OOS) does not affect the ability of plant systems to adequately mitigate the consequences of an accident previously evaluated.

This conclusion was derived by evaluating all applicable analyses including thermal limit, American Society of Mechanical Engineers (ASME) pressurization events, margin to unpiped safety valve, anticipated transient analysis without scram, loss of coolant accident (LOCA), station blackout, and Appendix R analyses. Therefore, there is no increase in the probability or consequences of an accident previously evaluated because the analyses support operation with the Target Rock SRV safety function OOS.

- (2) Create the possibility of a new or different kind of accident from any accident previously evaluated:

Since the requested change has been previously evaluated, no new precursors of an accident are created and no new or different kinds of accidents are created. Therefore, the proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

This conclusion was derived by evaluating all applicable analyses including thermal limit, ASME pressurization events, margin to unpiped safety valve, anticipated transient analysis without scram events, station blackout, and Appendix R analyses. Therefore, the proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated because the analyses support operation with the Target Rock SRV safety function OOS.

(3) **Involve a significant reduction in a margin of safety:**

Allowing Dresden operation with the Target Rock SRV safety function OOS will not involve any reduction in margin of safety. This conclusion was derived by evaluating all applicable analyses including thermal limit, ASME pressurization events, margin to un piped safety valve, anticipated transient analysis without scram events, station blackout, and Appendix R analyses. The analyses previously evaluated remain valid and conservative. Thus there is no reduction in the margin of safety.

Accordingly, the Commission has made a final determination that the amendment involves no significant hazards consideration.

6.0 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.

7.0 ENVIRONMENTAL CONSIDERATION

The amendment changes 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 amendment involves 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 amendment involves no significant hazards consideration, and there has been no public comment on such finding (64 FR 27824). Accordingly, the amendment meets 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 amendment.

8.0 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 amendment will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributor: L. Rossbach

Date: June 4, 1999