



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

DOCKET FILE

June 30, 1989

Docket Nos.: 50-237
and 50-249

Mr. Thomas J. Kovach
Nuclear Licensing Manager
Commonwealth Edison Company
Post Office Box 767
Chicago, Illinois 60690

Dear Mr. Kovach:

SUBJECT: REPLACE FIRE PROTECTION LICENSE CONDITION AND REMOVAL OF FIRE
PROTECTION TECHNICAL SPECIFICATIONS AS PER GENERIC LETTERS 86-10 AND
88-12 (TAC NOS. 71256 AND 71257)

Re: Dresden Nuclear Power Station, Unit Nos. 2 and 3

The Commission has issued the enclosed Amendment No. 106 to Provisional
Operating License No. DPR-19 for Dresden Unit 2 and Amendment No. 101 to
Facility Operating License No. DPR-25 for Dresden Unit 3. These amendments
are in response to your application dated February 22, 1989.

The aforementioned amendments replace the existing license conditions on fire
protection with the standard condition noted in Generic Letter 86-10 and
remove requirements for fire detection systems, fire suppression systems,
fire barriers and fire brigade staffing requirements as per guidance contained
in Generic Letter 86-10 and 88-12.

A copy of our related Safety Evaluation is also enclosed. The Notice of Issuance
will be included in the Commission's biweekly Federal Register notices.

Sincerely,

Byron L. Siegel, Project Manager
Project Directorate III-2
Division of Reactor Projects III,
IV, V, and Special Projects

Enclosures:

1. Amendment No. 106 to
License No. DPR-19
2. Amendment No. 101 to
License No. DPR-25
3. Safety Evaluation

cc w/enclosures:
See next page

DFoI
1/1

C/P-1
ent

Mr. Thomas J. Kovach
Commonwealth Edison Company

Dresden Nuclear Power Station
Units 2 and 3

cc:

Michael I. Miller, Esq.
Sidley and Austin
One First National Plaza
Chicago, Illinois 60603

Mr. J. Eenigenburg
Plant Superintendent
Dresden Nuclear Power Station
Rural Route #1
Morris, Illinois 60450

U. S. Nuclear Regulatory Commission
Resident Inspectors Office
Dresden Station
Rural Route #1
Morris, Illinois 60450

Chairman
Board of Supervisors of
Grundy County
Grundy County Courthouse
Morris, Illinois 60450

Regional Administrator
Nuclear Regulatory Commission, Region III
799 Roosevelt Road, Bldg. #4
Glen Ellyn, Illinois 60137

Mr. Michael E. Parker, Chief
Division of Engineering
Illinois Department of Nuclear Safety
1035 Outer Park Drive, 5th Floor
Springfield, Illinois 62704

June 30, 1989

Docket Nos.: 50-237
and 50-249

Mr. Thomas J. Kovach
Nuclear Licensing Manager
Commonwealth Edison Company
Post Office Box 767
Chicago, Illinois 60690

Dear Mr. Kovach:

DISTRIBUTION

Docket file

EJordan
PDIII-2 r/f
WJones
GHolahan
LLuther
MVirgilio
DHagan
GPA/PA
CMCracken

OGC
NRC & Local PDRs
BGrimes
ACRS (10)
BSiegel
TBarnhart (8)
EButcher
ARM/LFMB

SUBJECT: REPLACE FIRE PROTECTION LICENSE CONDITION AND REMOVAL OF FIRE
PROTECTION TECHNICAL SPECIFICATIONS AS PER GENERIC LETTERS 86-10 AND
88-12 (TAC NOS. 71256 AND 71257)

Re: Dresden Nuclear Power Station, Unit Nos. 2 and 3

The Commission has issued the enclosed Amendment No. 106 to Provisional
Operating License No. DPR-19 for Dresden Unit 2 and Amendment No. 101 to
Facility Operating License No. DPR-25 for Dresden Unit 3. These amendments
are in response to your application dated February 22, 1989.

The aforementioned amendments replace the existing license conditions on fire
protection with the standard condition noted in Generic Letter 86-10 and
remove requirements for fire detection systems, fire suppression systems,
fire barriers and fire brigade staffing requirements as per guidance contained
in Generic Letter 86-10 and 88-12.

A copy of our related Safety Evaluation is also enclosed. The Notice of Issuance
will be included in the Commission's biweekly Federal Register notices.

Sincerely,

151

Byron L. Siegel, Project Manager
Project Directorate III-2
Division of Reactor Projects III,
IV, V, and Special Projects

Enclosures:

1. Amendment No. 106 to
License No. DPR-19
2. Amendment No. 101 to
License No. DPR-25
3. Safety Evaluation

cc w/enclosures:
See next page

*PREVIOUSLY CONCURRED

PDIII-2:LA
LLuther:dm
6/30/89

PDIII-2:PM
BSiegel
6/30/89

OGC*
5/11/89

PDIII-2:(A)PD
PShemanski
6/30/89

ECEB
DKubicki
6/30/89

P.S.

ofx

Docket Nos.: 50-237
and 50-249

Mr. Thomas J. Kovach
Nuclear Licensing Manager
Commonwealth Edison Company
Post Office Box 767
Chicago, Illinois 60690

Dear Mr. Kovach:

DISTRIBUTION

Docket File

EJordan
PDIII-2 r/f
WJones
GHolahan
LLuther
MVirgilio
DHagan
GPA/PA
CMcCracken

OGC
NRC & Local PDRs
BGrimes
ACRS (10)
BSiegel
TBarnhart (8)
EButcher
ARM/LFMB

SUBJECT: REPLACE FIRE PROTECTION LICENSE CONDITION AND REMOVAL OF FIRE
PROTECTION TECHNICAL SPECIFICATIONS AS PER GENERIC LETTERS 86-10 AND
88-12 (TAC NOS. 71256 AND 71257)

Re: Dresden Nuclear Power Station, Unit Nos. 2 and 3

The Commission has issued the enclosed Amendment No. 106 to Provisional
Operating License No. DPR-19 for Dresden Unit 2 and Amendment No. 101 to
Facility Operating License No. DPR-25 for Dresden Unit 3. These amendments
are in response to your application dated February 22, 1989.

The aforementioned amendments replace the existing license conditions on fire
protection with the standard condition noted in Generic Letter 86-10 and
remove requirements for fire detection systems, fire suppression systems,
fire barriers and fire brigade staffing requirements as per guidance contained
in Generic Letter 86-10 and 88-12.

A copy of our related Safety Evaluation is also enclosed. The Notice of Issuance
will be included in the Commission's biweekly Federal Register notices.

Sincerely,

Byron L. Siegel, Project Manager
Project Directorate III-2
Division of Reactor Projects III,
IV, V, and Special Projects

Enclosures:

1. Amendment No. 106 to
License No. DPR-19
2. Amendment No. 101 to
License No. DPR-25
3. Safety Evaluation

cc w/enclosures:
See next page

*PREVIOUSLY CONCURRED

PDIII-2:LA*
LLuther:dmj
5/02 /89

PDIII-2:PM*
BSiegel
5/02/89

OGC *W/enclosure to*
gomy
5/ /89

PDIII-2:PD*
DMuller
5/03/89



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

COMMONWEALTH EDISON COMPANY

DOCKET NO. 50-237

DRESDEN NUCLEAR POWER STATION, UNIT NO. 2

AMENDMENT TO PROVISIONAL OPERATING LICENSE

Amendment No. 106
License No. DPR-19

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by the Commonwealth Edison Company (the licensee) dated February 22, 1989 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 paragraphs 3.B. and 3.H. of Provisional Operating License No. DPR-19 are hereby amended to read as follows:

B. Technical Specifications

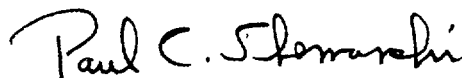
The Technical Specifications contained in Appendix A, as revised through Amendment No. 106, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

- H. Commonwealth Edison Company shall implement and maintain in effect all provisions of the approved fire protections program as described in the Updated Final Safety Analysis Report for the facility and as approved in the SERs dated March 22, 1978 with supplements dated December 2, 1980 and February 12, 1981; January 19, 1983; July 17, 1987; September 28, 1987; and January 5, 1989, subject to the following provisions:

The licensee may make changes to the approved fire protection program without prior approval of the Commission only if those changes would not adversely affect the ability to achieve and maintain safe shutdown in the event of a fire.

3. This license amendment is effective as of the date of its issuance to be implemented within 60 days.

FOR THE NUCLEAR REGULATORY COMMISSION



Paul C. Shemanski, Acting Director
Project Directorate III-2
Division of Reactor Projects - III,
IV, V and Special Projects

Attachment:
Changes to the Technical
Specifications

Date of Issuance: June 30, 1989

ATTACHMENT TO LICENSE AMENDMENT NO. 106

PROVISIONAL OPERATING LICENSE DPR-19

DOCKET NO. 50-237

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.

<u>REMOVE</u>	<u>INSERT</u>
iv	iv
3/4.12-1	
3/4.12-2	
3/4.12-3	
3/4.12-4	
3/4.12-5	
3/4.12-6	
3/4.12-7	
3/4.12-8	
3/4.12-9	
3/4.12-10	
3/4.12-11	
3/4.12-12	
3/4.12-13	
3/4.12-14	
B 3/4.12-15	
B 3/4.12-16	
B 3/4.12-17	
B 3/4.12-18	
B 3/4.12-19	
B 3/4.12-20	
B 3/4.12-21	
6-1	6-1
6-7	6-5
6-13	6-11

(Table of Contents, Cont'd.)

	<u>Page</u>
3.9.C Diesel Fuel	3/4.9 - 4
3.9.D Diesel Generator Operability	3/4.9 - 4
Limiting Conditions for Operation Bases (3.9)	B 3/4.9 - 7
Surveillance Requirement Bases (4.9)	B 3/4.9 - 8
3.10 Refueling	3/4.10- 1
3.10.A Refueling Interlocks	3/4.10- 1
3.10.B Core Monitoring	3/4.10- 1
3.10.C Fuel Storage Pool Water Level	3/4.10- 2
3.10.D Control Rod and Control Rod Drive Maintenance	3/4.10- 3
3.10.E Extended Core Maintenance	3/4.10- 4
3.10.F Spent Fuel Cask Handling	3/4.10- 5
Limiting Conditions for Operation Bases (3.10)	B 3/4.10- 8
Surveillance Requirement Bases (4.10)	B 3/4.10-11
3.11 High Energy Piping Integrity (outside containment)	3/4.11- 1
Limiting Conditions for Operation Bases (3.11)	B 3/4.11- 4
Surveillance Requirement Bases (4.11)	B 3/4.11- 4
3.12 Fire Protection Systems - Sections 3.12.A through	
3.12.H - Deleted per Generic Letters 86-10 and	
88-12 (Amendment 106)	
 4.0 <u>SURVEILLANCE REQUIREMENTS</u>	
4.1 Reactor Protection System	3/4.1 - 1
4.2 Protective Instrumentation	3/4.2 - 1
4.2.A Primary Containment Isolation Functions	3/4.2 - 1
4.2.B Core and Containment Cooling Systems --	
Initiation and Control	3/4.2 - 1
4.2.C Control Rod Block Actuation	3/4.2 - 2
4.2.D Refueling Floor Radiation Monitors	3/4.2 - 2
4.2.E Post Accident Instrumentation	3/4.2 - 3
4.2.F Radioactive Liquid Effluent Instrumentation	3/4.2 - 4
4.2.G Radioactive Gaseous Effluent Instrumentation	3/4.2 - 5
4.3 Reactivity Control	3/4.3 - 1
4.3.A Reactivity Limitations	3/4.3 - 1
4.3.B Control Rods	3/4.3 - 4
4.3.C Scram Insertion Times	3/4.3 -10

6.0 ADMINISTRATIVE CONTROLS

6.1 Organization, Review, Investigation and Audit

- A. Onsite and offsite organizations shall be established for the unit operation and corporate management, respectively. The onsite and offsite organizations shall include the positions for activities affecting the safety of the nuclear power plant.
1. Lines of authority, responsibility, and communication shall be established and defined for the highest management levels through the intermediate levels to and including all operating organization positions. These relationships shall be documented and updated, as appropriate, in the form of organization charts, functional descriptions of department responsibilities and relationships, and job descriptions for key personnel positions, or in the equivalent forms of documentation. The requirements shall be documented in the Quality Assurance Manual or the Management Plan for Nuclear Operations, Section 3 Organizational Authority, Activity; Section 6 Interdepartmental Relationships.
 2. The Station Manager shall be responsible for overall unit safe operation and shall have control over those onsite activities necessary for safe operation and maintenance of plant.
 3. The Senior Vice President-Nuclear Operations shall have the corporate responsibility for overall plant nuclear safety and shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the plant to ensure nuclear safety.
 4. The individuals who train the operating staff and those who carry out health physics and quality assurance functions may report to the appropriate onsite manager; however, they shall have sufficient organizational freedom to ensure their independence from operational pressures.
- B. DELETED
- C. The shift manning for the station shall be as shown in Table 6.1.1. The Operating Assistant Superintendent, Operating Engineers, Shift Engineers, and Shift Foremen shall have a Senior Operating License. The Fuel Handling Foreman shall have a limited Senior Operating License. The Vice President BWR Operations on the corporate level has responsibility for the Fire Protection Program. An Operating Engineer at the station will be responsible for implementation of the Fire Protection Program.

6.0 ADMINISTRATIVE CONTROLS (Cont'd.)

- (5) Noncompliance with NRC requirements, or of internal procedures or instructions having nuclear safety significance.
- (6) Significant operating abnormalities or deviations from normal and expected performance of plant equipment that affect nuclear safety as referred to it by the On-site Review and Investigative Function.
- (7) Reportable events under 10 CFR 50.73.
- (8) All recognized indications of an unanticipated deficiency in some aspect of design or operation of safety related structures, systems or components.
- (9) Review and report findings and recommendations regarding all changes to the Generating Stations Emergency Plan prior to implementation of such changes.
- (10) Review and report findings and recommendations regarding all items referred by the Technical Staff Supervisor, Station Manager, Vice President BWR Operations and AVP Quality Programs and Assessment.
- (11) Review changes to the Fire Protection Program and implementing procedures.

b. Station Audit Function

The Station Audit Function shall be the responsibility of the AVP Quality Programs and Assessment independent of BWR Operations. Such responsibility is delegated to the Nuclear Quality Programs Manager.

Either of the above, or designated Corporate Staff or Supervisor approved by AVP Quality Programs and Assessment shall approve the audit agenda and checklists, the findings and the report of each audit. Audits shall be performed in accordance with the Company Quality Assurance Program and Procedures. Audits shall be performed to assure that safety-related functions are covered within the period designated below:

- (1) Audit of the Conformance of facility operation to provisions contained within the Technical Specifications and applicable license conditions at least once per year.

6.0 ADMINISTRATIVE CONTROLS (Cont'd.)

- (7) Performance of special reviews and investigations and reports thereon as requested by the Superintendent of the Off-site Review and Investigative Function.
- (8) Review of the Station Security Plan and shall submit recommended changes to the Director of Corporate Security and the AVP Quality Programs and Assessment in lieu of distribution in accordance with 6.1.G.2.c.(1).
- (9) Review of the Emergency Plan and station implementing procedures and identification of recommended changes.
- (10) Review of reportable events and actions taken to prevent recurrence.
- (11) Review of any unplanned on-site release of radioactive material to the environs including the preparation and forwarding of reports covering evaluation recommendations and disposition of the corrective action to prevent recurrence to the Vice President BWR Operations and to the Superintendent of the Off-site Review and Investigative Function.
- (12) Review of changes to the PCP and ODCM and major changes to the radwaste treatment systems.
- (13) Review changes to the Fire Protection Program and implementing procedures.

b. Authority

The Technical Staff Supervisor is responsible to the Station Manager (or designee) and shall make recommendations in a timely manner in all areas of review, investigation, and quality control phases of plant maintenance, operation and administrative procedures relating to facility operations. The Technical Staff Supervisor shall have the authority to request the action necessary to ensure compliance with rules, regulations, and procedures when in his opinion such action is necessary. The Station Manager (or designee) shall follow such recommendations or select a course of action that is more conservative regarding safe operation of the facility. All such disagreements shall be reported immediately to the Vice President BWR Operations and the Superintendent of the Off-site Review and Investigative Function.



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

COMMONWEALTH EDISON COMPANY

DOCKET NO. 50-249

DRESDEN NUCLEAR POWER STATION, UNIT NO. 3

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 101
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 February 22, 1989 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 1;
 - 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 paragraphs 3.B. and 3.G. of Facility Operating License No. DPR-25 are hereby amended to read as follows:

B. Technical Specifications

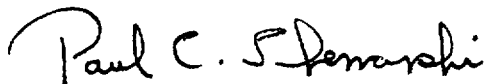
The Technical Specifications contained in Appendix A, as revised through Amendment No. 101, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

- G. Commonwealth Edison Company shall implement and maintain in effect all provisions of the approved fire protections program as described in the Updated Final Safety Analysis Report for the facility and as approved in the SERs dated March 22, 1978 with supplements dated December 2, 1980 and February 12, 1981; January 19, 1983; July 17, 1987; September 28, 1987; and January 5, 1989, subject to the following provisions:

The licensee may make changes to the approved fire protection program without prior approval of the Commission only if those changes would not adversely affect the ability to achieve and maintain safe shutdown in the event of a fire.

3. This license amendment is effective as of the date of its issuance to be implemented within 60 days.

FOR THE NUCLEAR REGULATORY COMMISSION



Paul C. Shemanski, Acting Director
Project Directorate III-2
Division of Reactor Projects - III,
IV, V and Special Projects

Attachment:
Changes to the Technical
Specifications

Date of Issuance: June 30, 1989

ATTACHMENT TO LICENSE AMENDMENT NO.101

FACILITY OPERATING LICENSE 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

INSERT

iv

iv

3/4.12-1

3/4.12-2

3/4.12-3

3/4.12-4

3/4.12-5

3/4.12-6

3/4.12-7

3/4.12-8

3/4.12-9

3/4.12-10

3/4.12-11

3/4.12-12

3/4.12-13

3/4.12-14

B 3/4.12-15

B 3/4.12-16

B 3/4.12-17

B 3/4.12-18

B 3/4.12-19

B 3/4.12-20

B 3/4.12-21

6-1

6-7

6-13

6-1

6-5

6-11

(Table of Contents, Cont'd.)

	<u>Page</u>
3.9.C Diesel Fuel	3/4.9-4
3.9.D Diesel Generator Operability	3/4.9-4
Limiting Conditions for Operation Bases (3.9)	B 3/4.9-7
Surveillance Requirement Bases (4.9)	B 3/4.9-8
3.10 Refueling	3/4.10-1
3.10.A Refueling Interlocks	3/4.10-1
3.10.B Core Monitoring	3/4.10-1
3.10.C Fuel Storage Pool Water Level	3/4.10-2
3.10.D Control Rod and Control Rod Drive Maintenance	3/4.10-3
3.10.E Extended Core Maintenance	3/4.10-4
3.10.F Spent Fuel Cask Handling	3/4.10-5
Limiting Conditions for Operation Bases (3.10)	B 3/4.10-8
Surveillance Requirement Bases (4.10)	B 3/4.10-11
3.11 High Energy Piping Integrity (outside containment)	3/4.11-1
Limiting Conditions for Operation Bases (3.11)	B 3/4.11-4
Surveillance Requirement Bases (4.11)	B 3/4.11-4
3.12 Fire Protection Systems - Sections 3.12.A through 3.12.H - Deleted per Generic Letters 86-10 and 88-12 (Amendment 101)	
4.0 <u>SURVEILLANCE REQUIREMENTS</u>	
4.1 Reactor Protection System	3/4.1-1
4.2 Protective Instrumentation	3/4.2-1
4.2.A Primary Containment Isolation Functions	3/4.2-1
4.2.B Core and Containment Cooling Systems -- Initiation and Control	3/4.2-1
4.2.C Control Rod Block Actuation	3/4.2-2
4.2.D Refueling Floor Radiation Monitors	3/4.2-2
4.2.E Post Accident Instrumentation	3/4.2-3
4.2.F Radioactive Liquid Effluent Instrumentation	3/4.2-4
4.2.G Radioactive Gaseous Effluent Instrumentation	3/4.2-5
4.3 Reactivity Control	3/4.3-1
4.3.A Reactivity Limitations	3/4.3-1
4.3.B Control Rods	3/4.3-4
4.3.C Scram Insertion Times	3/4.3-10

6.0 ADMINISTRATIVE CONTROLS

6.1 Organization, Review, Investigation and Audit

- A. Onsite and offsite organizations shall be established for the unit operation and corporate management, respectively. The onsite and offsite organizations shall include the positions for activities affecting the safety of the nuclear power plant.
1. Lines of authority, responsibility, and communication shall be established and defined for the highest management levels through the intermediate levels to and including all operating organization positions. These relationships shall be documented and updated, as appropriate, in the form of organization charts, functional descriptions of department responsibilities and relationships, and job descriptions for key personnel positions, or in the equivalent forms of documentation. The requirements shall be documented in the Quality Assurance Manual or the Management Plan for Nuclear Operations, Section 3 Organizational Authority, Activity; Section 6 Interdepartmental Relationships.
 2. The Station Manager shall be responsible for overall unit safe operation and shall have control over those onsite activities necessary for safe operation and maintenance of plant.
 3. The Senior Vice President-Nuclear Operations shall have the corporate responsibility for overall plant nuclear safety and shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the plant to ensure nuclear safety.
 4. The individuals who train the operating staff and those who carry out health physics and quality assurance functions may report to the appropriate onsite manager; however, they shall have sufficient organizational freedom to ensure their independence from operational pressures.
- B. DELETED
- C. The shift manning for the station shall be as shown in Table 6.1.1. The Operating Assistant Superintendent, Operating Engineers, Shift Engineers, and Shift Foremen shall have a Senior Operating License. The Fuel Handling Foreman shall have a limited Senior Operating License. The Vice President BWR Operations on the corporate level has responsibility for the Fire Protection Program. An Operating Engineer at the station will be responsible for implementation of the Fire Protection Program.

6.0 ADMINISTRATIVE CONTROLS (Cont'd.)

- (4) Proposed changes in Technical Specifications or NRC operating licenses.
- (5) Noncompliance with NRC requirements, or of internal procedures or instructions having nuclear safety significance.
- (6) Significant operating abnormalities or deviations from normal and expected performance of plant equipment that affect nuclear safety as referred to it by the Onsite Review and Investigative Function.
- (7) Reportable Events reported under 10 CFR 50.73.
- (8) All recognized indications of an unanticipated deficiency in some aspect of design or operation of safety related structures, systems or components.
- (9) Review and report findings and recommendations regarding all changes to the Generating Stations Emergency Plan prior to implementation of such changes.
- (10) Review and report findings and recommendations regarding all items referred by the Technical Staff Supervisor, Station Manager, Vice President BWR Operations and AVP Quality Program and Assessment.
- (11) Review changes to the Fire Protection Program and implementing procedures.

b. Station Audit Function

The Station Audit Function shall be the responsibility of the AVP Quality Programs and Assessment independent of the Production Department. Such responsibility is delegated to the Nuclear Quality Programs Manager.

Either of the above, or designated Corporate Staff or Supervision approved by AVP Quality Programs and Assessment shall approve the audit agenda and checklists, the findings and the report of each audit. Audits shall be performed in accordance with the Company Quality Assurance Program and Procedures. Audits shall be performed to assure that safety-related functions are covered within the period designated below.

6.0 ADMINISTRATIVE CONTROLS (Cont'd.)

- (6) Review of facility operations to detect potential safety hazards.
- (7) Performance of special reviews and investigations and reports thereon as requested by the Superintendent of the Off-site Review and Investigative Function.
- (8) Review the Station Security Plan and shall submit recommended changes to the Director of Corporate Security and the AVP Quality Programs and Assessment in lieu of distribution in accordance with 6.1.G.2.c(1).
- (9) Review the Emergency Plan and station implementing procedures and identification of recommended changes.
- (10) Review of reportable events and actions taken to prevent recurrence.
- (11) Review of any unplanned on-site release of radioactive material to the environs including the preparation and forwarding of reports covering evaluation recommendations and disposition of the corrective action to prevent recurrence to the Vice President BWR Operations and to the Superintendent of the Off-site Review and Investigative Function.
- (12) Review of changes to the PCP and ODCM and major changes to the radwaste treatment systems.
- (13) Review changes to the Fire Protection Program and implementing procedures.

b. Authority

The Technical Staff Supervisor is responsible to the Station Manager (or designee) and shall make recommendations in a timely manner in all areas of review, investigation, and quality control phases of plant maintenance, operation and administrative procedures relating to facility operations. The Technical Staff Supervisor shall have the authority to request the action necessary to ensure compliance with rules, regulations, and procedures when in his opinion such action is necessary. The Station Manager (or designee) shall follow such recommendations or select a course of action that is more conservative regarding safe operation of the facility. All such disagreements shall be reported immediately to the Vice President BWR Operations and the Superintendent of the Off-site Review and Investigative Function.



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
SUPPORTING AMENDMENT NO. 106 TO PROVISIONAL OPERATING LICENSE NO. DPR-19
AND AMENDMENT NO. 101 TO FACILITY OPERATING LICENSE NO. DPR-25

COMMONWEALTH EDISON COMPANY

DRESDEN NUCLEAR POWER STATION, UNIT NOS. 2 AND 3

DOCKET NOS. 50-237 AND 50-249

1.0 INTRODUCTION

By letter dated February 22, 1989, Commonwealth Edison Company (the licensee) proposed that the existing license conditions on fire protection be replaced with the standard condition noted in Generic Letter 86-10 and also proposed changes to the Appendix A Technical Specifications (TS) for Dresden Units 2 and 3. The proposed changes would remove requirements for fire detection systems, fire suppression systems, fire barriers, and fire brigade staffing requirements as recommended by Generic Letter 86-10. The proposed changes would also modify the administrative control requirements of the TS to add requirements for the Fire Protection Program that are similar to requirements for other programs implemented by license condition. Guidance on these proposed changes to TS was provided to all power reactor licensee and applicants by Generic Letter 88-12, dated August 2, 1988.

2.0 BACKGROUND

Following the fire at the Browns Ferry Nuclear Power Plant on March 22, 1975, the Commission undertook a number of actions to ensure that improvements were implemented in the Fire Protection Programs for all power reactor facilities. Because of the extensive modification of Fire Protection Programs and the number of open issues resulting from staff evaluations, a number of revisions and alterations occurred in these programs over the years. Consequently, licensees were requested by Generic Letter 86-10 to incorporate the final NRC approved Fire Protection Program in their Final Safety Analysis Reports (FSARs). In this manner, the Fire Protection Program -- including the systems, the administrative and technical controls, the organization, and other plant features associated with fire protection -- would have a status consistent with that of other plant features described in the FSAR. In addition, the Commission concluded that a standard license condition, requiring compliance with the provisions of the Fire Protection Program as described in the FSAR, should be used to ensure uniform enforcement of fire protection requirements. Finally, the Commission stated that with the requested actions, licensees may request an amendment to delete the fire protection TS that would now be unnecessary.

The licensees for the Callaway and Wolf Creek plants submitted lead-plant proposals to remove fire protection requirements from their TS. This action was an industry effort to obtain NRC guidance on an acceptable format for license amendment requests to remove fire protection requirements from TS.

Additionally, in the licensing review of new plants, the staff has approved applicant requests to remove fire protection requirements from TS issued with the operating license. Thus, on the basis of the lead-plant proposals and the staff's experience with TS for new licenses, Generic Letter 88-12 was issued to provide guidance on removing fire protection requirements from TS.

3.0 EVALUATION

Generic Letter 86-10 recommended the removal of fire protection requirements from the TS. Although a comprehensive Fire Protection Program is essential to plant safety, the basis for this recommendation is that many details of this program that are currently addressed in TS can be modified without affecting nuclear safety. Such modifications can be made provided that there are suitable administrative controls over these changes. These details, that are presently included in TS and which are removed by this amendment, do not constitute performance requirements necessary to ensure safe operation of the facility and, therefore, do not warrant being included in TS. At the same time, suitable administrative controls ensure that there will be careful review and analysis by competent individuals of any changes in the Fire Protection Program including those technical and administrative requirements removed from the TS to ensure that nuclear safety is not adversely affected. These controls include: (1) the TS administrative controls that are applicable to the Fire Protection Program, (2) the license condition on implementation of, and subsequent changes to, the Fire Protection Program, and (3) the 10 CFR 50.59 criteria for evaluating changes to the Fire Protection Program as described in the FSAR.

The specific details relating to fire protection requirements removed from TS by this amendment include those specifications for fire detection systems, fire suppression systems, fire barriers, and fire brigade staffing requirements. The administrative control requirements have been modified to include Fire Protection Program implementation as an element for which written procedures must be established, implemented, and maintained. In addition, the audit responsibilities of the On-Site Review and Investigative Function were expanded to include the review of the Fire Protection Program and implementing procedures and submittal of recommended changes to the Off-Site Review and Investigative Function.

The TS changes proposed by the licensee are in accordance with the guidance provided by Generic Letter 88-12, as addressed in the items below.

(1) Specification 6.1.G.2.a.13, On-Site Review and Investigative Function, was revised to add the review of the fire protection program implementation and Specification 6.1.G.1.a was revised to include the review of recommended changes by the Off-Site Review and Investigative Function.

(2) With the inclusion of Specification 6.1.G.1.a(11), Fire Protection Program implementation has been added to those programs for which written procedures are required. Specification 6.1.H, which was approved in a previous amendment, contains an inspection and audit requirement for the Fire Protection Program.

(3) Specifications 3.12 and 4.12, Fire Suppression Systems, their associated Surveillance Requirements, and Bases (including Fire Barriers and Fire Detection Instrumentation, and their associated Surveillance Requirements and Bases) were removed.

(4) Specification 6.2.C on fire brigade staffing requirements was removed.

As required by Generic Letter 86-10, the licensee by letter dated June 20, 1989 confirmed that the NRC approved Fire Protection Program has been incorporated into the FSAR and stated that any other references determined to be appropriate would be included in the 1989 calendar year FSAR update. Also, the licensee has proposed that the existing licensing conditions on the Fire Protection Program be replaced with the standard condition noted in Generic Letter 86-10.

The licensee confirmed that the operational conditions, remedial actions, and test requirements associated with the fire protection TS will be approved prior to removal from the TS and within 60 days from the approval date of this safety evaluation and included in the Fire Protection Program incorporated into the UFSAR. This satisfies the guidance of Generic Letter 88-12.

On the basis of its review of the above items, the staff concludes that the licensee has met the guidance of Generic Letter 88-12. Therefore, the staff finds the proposed changes acceptable.

4.0 ENVIRONMENTAL CONSIDERATION

These amendments involve changes to the use of the facility components located within the restricted area as defined in 10 CFR Part 20. The 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 off site, and that there is no significant increase in individual or cumulative occupational exposure. The staff has determined that the amendments involve no significant hazards consideration, and there has been no public comment on such finding. 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 these amendments.

5.0 CONCLUSION

The Commission made proposed determinations that the amendments involve no significant hazards consideration, which were published in the Federal Register (54 FR 13762) on April 5, 1989. The Commission consulted with the

State of Illinois. No public comments were received, and the state of Illinois did not have any comments.

On the basis of the considerations discussed above, the staff concludes 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 these amendments will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributors: Dennis J. Kubicki, SPLB/DEST
Thomas G. Dunning, OTSB/DOEA
Byron L. Siegel, NRR/DRSP

Dated: June 30, 1989