

February 11, 1993

Docket Nos. 50-237  
and 50-249

Mr. Thomas J. Kovach  
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Dear Mr. Kovach:

SUBJECT: ISSUANCE OF AMENDMENTS (TAC NOS. M84453 AND M84454)

The Commission has issued the enclosed Amendment No. 122 to Facility Operating License No. DPR-19 for Dresden, Unit 2, and Amendment No. 117 to Facility Operating License No. DPR-25 for Dresden, Unit 3. The amendments are in response to your application dated September 2, 1992.

The amendments delete Table 3.7.1, "Primary Containment Isolation," and modify Section 3/4.7.D, per the guidance contained in Generic Letter 91-08, of the Dresden Technical Specifications.

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  
John F. Stang for:

Byron L. Siegel, Project Manager  
Project Directorate III-2  
Division of Reactor Projects - III/IV/V  
Office of Nuclear Reactor Regulation

Enclosures:

1. Amendment No. 122 to DPR-19
2. Amendment No. 117 to DPR-25
3. Safety Evaluation

cc w/enclosures:  
See next page

OFC	LA:PDIII-2	PM:PDIII-2	D:PDIII-2	OGC
NAME	CMOORE	BSIEGEL	JDYER	
DATE	2/4/93	2/4/93	2/10/93	2/5/93

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Mr. Thomas J. Kovach  
Commonwealth Edison Company

Dresden Nuclear Power Station  
Unit Nos. 2 and 3

cc:

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

COMMONWEALTH EDISON COMPANY

DOCKET NO. 50-237

DRESDEN NUCLEAR POWER STATION, UNIT 2

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 122  
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 September 2, 1992, 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:

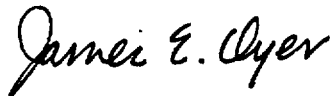
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(2) Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No. 122, 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, to be implemented within 30 days.

FOR THE NUCLEAR REGULATORY COMMISSION



James E. Dyer, Director  
Project Directorate III-2  
Division of Reactor Projects - III/IV/V  
Office of Nuclear Reactor Regulation

Attachment:  
Changes to the Technical  
Specifications

Date of Issuance: February 11, 1993

ATTACHMENT TO LICENSE AMENDMENT NO. 122

FACILITY OPERATING LICENSE NO. 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.

REMOVE

INSERT

vii

vii

1-0.3

1-0.3

3/4.7-6

3/4.7-6

3/4.7-9

3/4.7-9

3/4.7-27

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1.0 Definitions (Continued)

- R. Primary Containment Integrity - Primary containment integrity means that the drywell and pressure suppression chamber are intact and all of the following conditions are satisfied:
1. All manual containment isolation valves on lines connecting to the reactor coolant system or containment which are not required to be open during accident conditions are closed or comply with the requirements of Specification 3.7.D.
  2. At least one door in each airlock is closed and sealed.
  3. All automatic containment isolation valves are operable or deactivated in the isolated position or comply with the requirements of Specification 3.7.D.
  4. All blind flanges and manways are closed.

S. Protective Instrumentation Definitions

1. Instrument Channel - An instrument channel means an arrangement of a sensor and auxiliary equipment required to generate and transmit to a trip system a single trip signal related to the plant parameter monitored by that instrument channel.
  2. Trip System - A trip system means an arrangement of instrument channel trip signals and auxiliary equipment required to initiate action to accomplish a protective trip function. A trip system may require one or more instrument channel trip signals related to one or more plant parameters in order to initiate trip system action. Initiation of protective action may require the tripping of a single trip system or the coincident tripping of two trip systems.
  3. Protective Action - An action initiated by the protection system when a limit is reached. A protective action can be at a channel or system level.
  4. Protective Function - A system protective action which results from the protective action of the channels monitoring a particular plant condition.
- T. Rated Neutron Flux - Rated neutron flux is the neutron flux that corresponds to a steady-state power level of 2527 thermal megawatts.
- U. Rated Thermal Power - Rated thermal power means a steady-state power level of 2527 thermal megawatts.

3.7 LIMITING CONDITION FOR OPERATION  
(Cont'd.)

- (1) An overall integrated leakage rate for Type A tests of:
  - (a)  $L_{am}$  less than or equal to 75 percent of  $L_a$ .
  - (b)  $L_{tm}$  less than or equal to 75 percent of  $L_t$ .
- (2) (a) A combined leakage rate of less than or equal to 60 percent of  $L_a$  for all testable penetrations and isolation valves subject to Type B and C tests except for main steam isolation valves.

4.7 SURVEILLANCE REQUIREMENTS  
(Cont'd.)



3.7 LIMITING CONDITION FOR OPERATION  
(Cont'd.)

4.7 SURVEILLANCE REQUIREMENTS  
(Cont'd.)

(1) Main steam line isolation valves which shall be tested at a pressure of 25 psig each operating cycle.

(2) Bolted double-gasketed seals which shall be tested at a pressure of 48 psig whenever the seal is closed after being opened and each operating cycle.

(3) Air locks which shall be tested at 10 psig each operating cycle.

(4) Deleted

f. Continuous Leak Rate Monitor

(1) When the primary containment is inerted, the containment

3.7 LIMITING CONDITION FOR OPERATION  
(Cont'd.)

- d. The fuel cask or irradiated fuel is not being moved in the reactor building.
  - 2. If Specification 3.7.C.1 cannot be met, restore Secondary Containment Integrity within 4 hours or be in at least Hot Shutdown within the next 12 hours and in Cold Shutdown within the following 24 hours and establish the conditions listed in Specification 3.7.C.1.a through d.
- D. Primary Containment Isolation Valves
- 1. During reactor power operating conditions, all primary containment isolation valves and all instrument line flow check valves shall be operable except as specified in 3.7.D.2.

4.7 SURVEILLANCE REQUIREMENTS  
(Cont'd.)

- D. Primary Containment Isolation Valves
- 1. The primary containment isolation valves surveillance shall be performed as follows:
    - a. At least once per operating cycle the operable primary containment isolation valves that are power operated and automatically initiated shall be tested for simulated automatic initiation and closure times.

3.7 LIMITING CONDITION FOR OPERATION  
(Cont'd.)

2. In the event any primary containment isolation valve becomes inoperable, reactor power operation may continue provided at least one valve in

4.7 SURVEILLANCE REQUIREMENTS  
(Cont'd.)

- b. At least once per operating cycle the instrument line flow check valves shall be tested for proper operation.
- c. At least once per quarter:
  - (1) All normally open power-operated isolation valves (except for the main steam line power-operated isolation valves) shall be fully closed and reopened.
  - (2) With the reactor power less than 50% of rated, trip main steam isolation valves (one at a time) and verify closure time.
- d. At least twice per week the main steamline power-operated isolation valves shall be exercised by partial closure and subsequent reopening.
2. Whenever a primary containment isolation valve is inoperable, the position of at least one other valve in each line having an inoperable valve shall be recorded daily.

3.7 LIMITING CONDITION FOR OPERATION  
(Cont'd.)

each line having an inoperable valve is in the mode corresponding to the isolated condition.

3. If Specification 3.7.D.1 and 3.7.D.2 cannot be met, an orderly shutdown shall be initiated and the reactor shall be in the Cold Shutdown condition within 24 hours except for the Recirculation Loop Sample valves and the Drywell Air Sampling System valves which can be reopened after isolation for sampling.
4. The temperature of the main steamline air pilot valves shall be less than 170°F except as specified in 3.7.D.5 below.
5. From and after the date that the temperature of any main steamline air pilot valve is found to be greater than 170°F, reactor operation is permissible only during the succeeding seven days unless the temperature of such valve is sooner reduced to less than 170°F, provided the main steamline isolation valves are operable.

4.7 SURVEILLANCE REQUIREMENTS  
(Cont'd.)

3. The temperature of the main steamline air pilot valves shall be recorded daily.
4. When it is determined that the temperature of any main steamline air pilot valve is greater than 170°F, the main steamline isolation valves shall be demonstrated to be operable immediately and daily thereafter. The demonstration of operability shall be according to Specification 4.7.D.1.d.

### 3.7 LIMITING CONDITION FOR OPERATION BASES (Cont'd.)

standby gas treatment subsystems significantly different from the design flow will change the removal efficiency of the HEPA filters and charcoal adsorbers. If the performance requirements are met as specified, the calculated doses would be less than the guidelines stated in 10 CFR 100 for the accidents analyzed.

- D. Primary Containment Isolation Valves - Double isolation valves are provided on lines penetrating the primary containment and open to the free space of the containment. Closure of one of the valves in each line would be sufficient to maintain the integrity of the pressure suppression system. Automatic initiation is required to minimize the potential leakage paths from the containment in the event of a loss of coolant accident. A controlled list of the primary containment isolation valves is located within the Dresden Administrative Technical Requirements.

### 4.7 SURVEILLANCE REQUIREMENT BASES

#### A. Primary Containment

Because of the large volume and thermal capacity of the suppression pool, the volume and temperature normally changes very slowly and monitoring these parameters daily is sufficient to establish any temperature trends. By requiring the suppression pool temperature to be continually monitored and frequently logged during periods of significant heat addition, the temperature trends will be closely followed so that appropriate action can be taken. The requirement for an external visual examination following any event where potentially high loadings could occur provides assurance that no significant damage was encountered. Particular attention should be focused on structural discontinuities in the vicinity of the relief valve discharge since these are expected to be the points of highest stress.

The interiors of the drywell and suppression chamber are painted to prevent rusting. The inspection of the paint during each major refueling outage, approximately once per year, assures the paint is intact. Experience with this type of paint at fossil fueled generating stations indicates that the inspection interval is adequate.

#### 4.7 SURVEILLANCE REQUIREMENT BASES (Cont'd.)

analysis should be performed as required for operational use. Replacement adsorbent should be qualified according to the guidelines of Regulatory Guide 1.52, Revision 1 (June 1976). The charcoal adsorber efficiency test procedures will allow for the removal of one representative sample cartridge and testing in accordance with the guidelines of Table 3 of Regulatory Guide 1.52, Revision 1 (June 1976). The sample will be at least two inches in diameter and a length equal to the thickness of the bed. If the iodine removal efficiency test results are unacceptable, all adsorbent in the system will be replaced. High efficiency particulate filters are installed before and after the charcoal filters to prevent clogging of the carbon adsorbers and to minimize potential release of particulates to the environment. An efficiency of 99% is adequate to retain particulates that may be released to the reactor building following an accident. This will be demonstrated by in-place testing with DOP as the testing medium. Any HEPA filters found defective will be replaced with filters qualified pursuant to regulatory guide position C.3.d of Regulatory Guide 1.52, Revision 1 (June 1976). Once per operating cycle demonstration of HEPA filter pressure drop, operability of inlet heaters at rated power, air distribution to each HEPA filter, and automatic initiation of each standby gas treatment system subsystem is necessary to assure system performance capability.

##### D. Primary Containment Isolation Valves

Those large pipes comprising a portion of the reactor coolant system, whose failure could result in uncovering the reactor core, are supplied with automatic isolation valves (except those lines needed for emergency core cooling system operation or containment cooling). The closure times are adequate to prevent loss of more coolant from the circumferential rupture of any of these lines outside the containment than from a steam line rupture. Therefore, the isolation valve closure times are sufficient to prevent uncovering the core.



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

COMMONWEALTH EDISON COMPANY

DOCKET NO. 50-249

DRESDEN NUCLEAR POWER STATION, UNIT 3

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 117  
License No. DPR-25

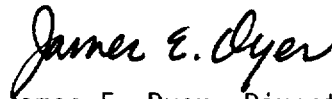
1. The Nuclear Regulatory Commission (the Commission) has found that:
  - A. The application for amendment by the Commonwealth Edison Company (the licensee) dated September 2, 1992, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's 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. 117, 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, to be implemented within 30 days.

FOR THE NUCLEAR REGULATORY COMMISSION



James E. Dyer, Director  
Project Directorate III-2  
Division of Reactor Projects - III/IV/V  
Office of Nuclear Reactor Regulation

Attachment:  
Changes to the Technical  
Specifications

Date of Issuance: February 11, 1993



ATTACHMENT TO LICENSE AMENDMENT NO. 117

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

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1-0.3

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3/4.7-6

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Table 4.6.2	Neutron Flux and Sample Withdrawal	B 3/4.6-30
Table 3.7.1	Deleted per the requirements of Generic Letter 91-08	
Table 4.8.1	Radioactive Gaseous Waste Sampling and Analysis Program	3/4.8-22
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Table 4.11-1	Deleted.	
Table 3.12-1	Deleted.	

## 1.0 DEFINITIONS (Cont'd.)

- R. Primary Containment Integrity - Primary containment integrity means that the drywell and pressure suppression chamber are intact and all of the following conditions are satisfied:
1. All manual containment isolation valves on lines connecting to the reactor coolant system or containment which are not required to be open during accident conditions are closed or comply with the requirements of Specification 3.7.D.
  2. At least one door in each airlock is closed and sealed.
  3. All automatic containment isolation valves are operable or deactivated in the isolated position or comply with the requirements of Specification 3.7.D.
  4. All blind flanges and manways are closed.
- S. Protective Instrumentation Definitions
1. Instrument Channel - An instrument channel means an arrangement of a sensor and auxiliary equipment required to generate and transmit to a trip system a single trip signal related to the plant parameter monitored by that instrument channel.
  2. Trip System - A trip system means an arrangement of instrument channel trip signals and auxiliary equipment required to initiate action to accomplish a protective trip function. A trip system may require one or more instrument channel trip signals related to one or more plant parameters in order to initiate trip system action. Initiation of protective action may require the tripping of a single trip system or the coincident tripping of two trip systems.
  3. Protective Action - An action initiated by the protection system when a limit is reached. A protective action can be at a channel or system level.
  4. Protective Function - A system protective action which results from the protective action of the channels monitoring a particular plant condition.
- T. Rated Neutron Flux - Rated neutron flux is the neutron flux that corresponds to a steady-state power level of 2527 thermal megawatts.
- U. Rated Thermal Power - Rated thermal power means a steady-state power level of 2527 thermal megawatts.

3.7 LIMITING CONDITION FOR OPERATION  
(Cont'd.)

4.7 SURVEILLANCE REQUIREMENTS  
(Cont'd.)

- (1) An overall integrated leakage rate for Type A tests of:
  - (a)  $L_{am}$  less than or equal to 75 percent of  $L_a$ .
  - (b)  $L_{tm}$  less than or equal to 75 percent of  $L_t$ .
- (2) (a) A combined leakage rate of less than or equal to 60 percent of  $L_a$  for all testable penetrations and isolation valves subject to Type B and C tests except for main steam isolation valves.

3.7 LIMITING CONDITION FOR OPERATION  
(Cont'd.)

4.7 SURVEILLANCE REQUIREMENTS  
(Cont'd.)

(2) Bolted double-gasketed seals which shall be tested at a pressure of 48 psig whenever the seal is closed after being opened and each operating cycle.

(3) Air locks which shall be tested at 10 psig each operating cycle.

(4) Deleted

f. Continuous Leak  
Rate Monitor

(1) When the primary containment is inerted, the containment shall be continuously monitored for gross leakage by review of the inerting system make-up requirements.

3.7 LIMITING CONDITION FOR OPERATION  
(Cont'd.)

- d. The fuel cask or irradiated fuel is not being moved in the reactor building.
  - 2. If Specification 3.7.C.1 cannot be met, restore Secondary Containment Integrity within 4 hours or be in at least Hot Shutdown within the next 12 hours and in Cold Shutdown within the following 24 hours and establish the conditions listed in Specification 3.7.C.1.a through d.
- D. Primary Containment Isolation Valves
- 1. During reactor power operating conditions, all primary containment isolation valves and all instrument line flow check valves shall be operable except as specified in 3.7.D.2.

4.7 SURVEILLANCE REQUIREMENTS  
(Cont'd.)

- D. Primary Containment Isolation Valves
- 1. The primary containment isolation valves surveillance shall be performed as follows:
    - a. At least once per operating cycle the operable primary containment isolation valves that are power operated and automatically initiated shall be tested for simulated automatic initiation and closure times.
    - b. At least once per operating cycle the instrument line flow check valves shall be tested for proper operation.

3.7 LIMITING CONDITION FOR OPERATION  
(Cont'd.)

2. In the event any primary containment isolation valve becomes inoperable, reactor power operation may continue provided at least one valve in each line having an inoperable valve is in the mode corresponding to the isolated condition.

4.7 SURVEILLANCE REQUIREMENTS  
(Cont'd.)

- c. At least once per quarter:
  - (1) All normally open power-operated isolation valves (except for the main steam line power-operated isolation valves) shall be fully closed and reopened.
  - (2) With the reactor power less than 50% of rated, trip main steam isolation valves (one at a time) and verify closure time.
- d. At least twice per week the main steam-line power-operated isolation valves shall be exercised by partial closure and subsequent reopening.
2. Whenever a primary containment isolation valve is inoperable, the position of at least one other valve in each line having an inoperable valve shall be recorded daily.

3.7 LIMITING CONDITION FOR OPERATION  
(Cont'd.)

3. If Specification 3.7.D.1 and 3.7.D.2 cannot be met, an orderly shutdown shall be initiated and the reactor shall be in the Cold Shutdown condition within 24 hours except for the Recirculation Loop Sample valves and the Drywell Air Sampling System valves which can be reopened after isolation for sampling.
4. The temperature of the main steamline air pilot valves shall be less than 170°F except as specified in 3.7.D.5 below.
5. From and after the date that the temperature of any main steamline air pilot valve is found to be greater than 170°F, reactor operation is permissible only during the succeeding seven days unless the temperature of such valve is sooner reduced to less than 170°F, provided the main steamline isolation valves are operable.

4.7 SURVEILLANCE REQUIREMENTS  
(Cont'd.)

3. The temperature of the main steamline air pilot valves shall be recorded daily.
4. When it is determined that the temperature of any main steamline air pilot valve is greater than 170°F, the main steamline isolation valves shall be demonstrated to be operable immediately and daily thereafter. The demonstration of operability shall be according to Specification 4.7.D.1.d.



3.7 LIMITING CONDITION FOR OPERATION BASES (Cont'd.)

results indicate a radioactive methyl iodide removal efficiency for expected accident conditions. Operation of the standby gas treatment subsystems significantly different from the design flow will change the removal efficiency of the HEPA filters and charcoal adsorbers. If the performance requirements are met as specified, the calculated doses would be less than the guidelines stated in 10 CFR 100 for the accidents analyzed.

- D. Primary Containment Isolation Valves - Double isolation valves are provided on lines penetrating the primary containment and open to the free space of the containment. Closure of one of the valves in each line would be sufficient to maintain the integrity of the pressure suppression system. Automatic initiation is required to minimize the potential leakage paths from the containment in the event of a loss of coolant accident. A controlled list of the primary containment isolation valves is located within the Dresden Administrative Technical Requirements.

4.7 SURVEILLANCE REQUIREMENT BASES

A. Primary Containment

Because of the large volume and thermal capacity of the suppression pool, the volume and temperature normally changes very slowly and monitoring these parameters daily is sufficient to establish any temperature trends. By requiring the suppression pool temperature to be continually monitored and frequently logged during periods of significant heat addition, the temperature trends will be closely followed so that appropriate action can be taken. The requirement for an external visual examination following any event where potentially high loadings could occur provides assurance that no significant damage was encountered. Particular attention should be focused on structural discontinuities in the vicinity of the relief valve discharge since these are expected to be the points of highest stress.

The interiors of the drywell and suppression chamber are painted to prevent rusting. The inspection of the paint during each major refueling outage, approximately once per year, assures the paint is intact. Experience with this type of paint at fossil fueled generating stations indicates that the inspection interval is adequate.

4.7      SURVEILLANCE REQUIREMENT BASES (Cont'd.)

analysis should be performed as required for operational use. Replacement adsorbent should be qualified according to the guidelines of Regulatory Guide 1.52, Revision 1 (June 1976). The charcoal adsorber efficiency test procedures will allow for the removal of one representative sample cartridge and testing in accordance with the guidelines of Table 3 of Regulatory Guide 1.52, Revision 1 (June 1976). The sample will be at least two inches in diameter and a length equal to the thickness of the bed. If the iodine removal efficiency test results are unacceptable, all adsorbent in the system will be replaced. High efficiency particulate filters are installed before and after the charcoal filters to prevent clogging of the carbon adsorbers and to minimize potential release of particulates to the environment. An efficiency of 99% is adequate to retain particulates that may be released to the reactor building following an accident. This will be demonstrated by in-place testing with DOP as the testing medium. Any HEPA filters found defective will be replaced with filters qualified pursuant to regulatory guide position C.3.d of Regulatory Guide 1.52, Revision 1 (June 1976). Once per operating cycle demonstration of HEPA filter pressure drop, operability of inlet heaters at rated power, air distribution to each HEPA filter, and automatic initiation of each standby gas treatment system subsystem is necessary to assure system performance capability.

D.      Primary Containment Isolation Valves

Those large pipes comprising a portion of the reactor coolant system, whose failure could result in uncovering the reactor core, are supplied with automatic isolation valves (except those lines needed for emergency core cooling system operation or containment cooling). The closure times are adequate to prevent loss of more coolant from the circumferential rupture of any of these lines outside the containment than from a steam line rupture. Therefore, the isolation valve closure times are sufficient to prevent uncovering the core.



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION  
RELATED TO AMENDMENT NO. 122 TO FACILITY OPERATING LICENSE NO. DPR-19  
AND AMENDMENT NO. 117 TO FACILITY OPERATING LICENSE NO. DPR-25

COMMONWEALTH EDISON COMPANY

DRESDEN NUCLEAR POWER STATION, UNITS 2 AND 3

DOCKET NOS. 50-237 AND 50-249

1.0 INTRODUCTION

By letter dated September 2, 1992, Commonwealth Edison Company (CECo, the licensee) requested an amendment to Facility Operating License Nos. DPR-19 and DPR-25 for Dresden Nuclear Power Station, Units 2 and 3. The proposed amendment would delete Table 3.7.1, "Primary Containment Isolation," and modify Section 3/4.7.D, per the guidance contained in Generic Letter (GL) 91-08, of the Dresden Technical Specifications (TS). In addition, an editorial change has been proposed that will eliminate an exemption from the TS that has expired and is no longer needed.

2.0 EVALUATION

The licensee has proposed deletion of Table 3.7.1, where referenced in TS Section 3/4.7.D. This table provides a reference to the valves that specifically perform the primary containment isolation function in this section of the TS. However, since no specific reference to the valves listed in table is made in the TS only minor changes to the TS have been proposed to support the table deletion. Since the valves listed in the table are not specifically referred to, relative to an operability or surveillance requirement, the staff finds that the proposed deletions are primarily administrative in nature and do not alter the requirements set forth in the existing TS. Since the proposed deletions are also consistent with the guidance contained in GL 91-08 the staff finds the proposed table deletion acceptable.

With the removal of Table 3.7.1, the licensee has proposed to delete the references to the table in Section 3/4.7.D of the TS. The licensee has also committed to include the valves currently contained in the table within the Dresden Administrative Technical Requirements (DATR) to retain administrative control. Dresden Administrative Procedure 02-20, provides the guidelines for the control and use of DATR's. Any changes to DATR's will be reviewed and approved by the Onsite Review and Investigative Function using the 10 CFR 50.59 change process. The licensee has also stated TS Table 3.7.1 will become a DATR, which will refer to TS 3/4.7 to assure compliance with TS for

components required to be operable by Limiting Condition for Operation (LCO) 3.7.D.2. Since these proposed changes are also administrative in nature and consistent with the guidance contained in GL 91-08, the staff finds them acceptable.

The licensee has proposed to delete the exemption of Reactor Building Closed Cooling Water (RBCCW) pathways from the requirements of 10 CFR 50, Appendix J, referenced in TS 3.7.A.2.b(1)(a) and 3.7.A.2.b(2)(a) because it has expired and is, therefore, no longer in effect. Since this exemption has expired this TS change is administrative in nature and, therefore, the staff finds it acceptable.

### 3.0 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.

### 4.0 ENVIRONMENTAL CONSIDERATION

The amendments change recordkeeping, reporting, or administrative procedures or requirements. Accordingly, the amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(10). 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.

### 5.0 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: Byron L. Siegel

Date: February 11, 1993

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