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

October 1, 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 AMENDMENTS (TAC NOS. MA5892 AND MA5893)

Dear Mr. Kingsley:

The U.S. Nuclear Regulatory Commission (Commission) has issued the enclosed Amendment No. 174 to Facility Operating License No. DPR-19 and Amendment No. 170 to Facility Operating License No. DPR-25 for Dresden, Units 2 and 3, respectively. The amendments are in response to your application dated May 20, 1999, as supplemented by letters dated September 8, September 16 and September 20, 1999.

The amendments revise Technical Specification (TS) Section 3.8.A, "Containment Cooling Service Water System," (CCSW) to clarify that only one pump is required to support operability of the Control Room Emergency Ventilation System (CREVS).

Based on our review, we are concerned about the quality and timeliness of the application for the proposed changes to CCSW TS 3.8.A. The application stated that the proposed change was acceptable because it was consistent with the current design requirements for operating CREVS. However, the proposed change could be viewed as a reduction in the CCSW TS requirements leading to a reduction in CREVS reliability. Background information related to the staff's acceptance of the CREVS system and to the history of the development of the current TSs was critical to the staff's review of this amendment, yet this information was not included in the application. This issue was complicated further by the quality of the publicly available design information for these systems. The proposed TS changes did not adequately clarify the system requirements, and required several revisions. Also, the frequent discussions with your staff revealed some apparent weaknesses in their understanding of an acceptable licensing bases and TS for this system. With respect to timeliness, your June 16, 1998, response to Administrative Letter 98-03 showed the CCSW TS amendment request scheduled for submittal by September 30, 1998, but it was not submitted until May 20, 1999. Finally, we did not learn until August 10, 1999, that the Unit 2 refueling outage schedule depended upon this CCSW amendment. The staff believes that these issues could have been prevented by more effective review and oversight. These issues indicate that more management attention should be focused on providing timely, complete, and high quality submittals to the NRC.

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Your May 20, 1999, letter also proposed to change TS Section 3/4.5.C, "Suppression Chamber," to revise the minimum water level in the torus when the plant is in cold shutdown or

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refueling (Modes 4 or 5). The proposed torus level TS change is unrelated to the CCSW TS changes. After consulting with your staff, we chose to split our consideration of the proposed amendments into two parts in order to support the immediate need for the CCSW portion of the amendment request. Therefore, the proposed changes to TS section 3/4.5.C will be evaluated separately and issued as a separate licensing action. We understand that you have instituted administrative controls to maintain a conservative minimum water level in the torus in Modes 4 and 5.

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

Docket Nos. 50-237 and 50-249

Enclosures: 1. Amendment No. 174 to DPR-19
2. Amendment No. 170 to DPR-25
3. Safety Evaluation

cc w/encls: See next page

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O. Kingsley
Commonwealth Edison Company

Dresden Nuclear Power Station
Units 2 and 3

cc:

Commonwealth Edison Company
Site Vice President - Dresden
6500 N. Dresden Road
Morris, Illinois 60450-9765

Commonwealth Edison Company
Dresden Station Manager
6500 N. Dresden Road
Morris, Illinois 60450-9765

U.S. Nuclear Regulatory Commission
Dresden Resident Inspectors Office
6500 N. Dresden Road
Morris, Illinois 60450-9766

Regional Administrator
U.S. NRC, Region III
801 Warrenville Road
Lisle, Illinois 60532-4351

Illinois Department of Nuclear Safety
Office of Nuclear Facility Safety
1035 Outer Park Drive
Springfield, Illinois 62704

Chairman
Grundy County Board
Administration Building
1320 Union Street
Morris, Illinois 60450

Document Control Desk-Licensing
Commonwealth Edison Company
1400 Opus Place, Suite 400
Downers Grove, Illinois 60515

Commonwealth Edison Company
Reg. Assurance Manager - Dresden
6500 N. Dresden Road
Morris, Illinois 60450-9765

Mr. David Helwig
Senior Vice President
Commonwealth Edison Company
Executive Towers West III
1400 Opus Place, Suite 900
Downers Grove, Illinois 60515

Mr. Gene H. Stanley
PWR Vice President
Commonwealth Edison Company
Executive Towers West III
1400 Opus Place, Suite 900
Downers Grove, Illinois 60515

Mr. Christopher Crane
BWR Vice President
Commonwealth Edison Company
Executive Towers West III
1400 Opus Place, Suite 900
Downers Grove, Illinois 60515

Mr. R. M. Krich
Vice President - Regulatory Services
Commonwealth Edison Company
Executive Towers West III
1400 Opus Place, Suite 500
Downers Grove, Illinois 60515

Ms. Pamela B. Stroebel
Senior Vice President and General Counsel
Commonwealth Edison Company
P.O. Box 767
Chicago, Illinois 60690-0767

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

COMMONWEALTH EDISON COMPANY

DOCKET NO. 50-237

DRESDEN NUCLEAR POWER STATION, UNIT 2

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 174
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 May 20, 1999, as supplemented by letters dated September 8, September 16, and September 20, 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 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 contain in Appendix A, as revised through Amendment No. 174 , 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: October 1, 1999

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. 170
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 20, 1999, as supplemented by letters dated September 8, September 16, and September 20, 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:

B. Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No. 170 , 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: October 1, 1999

ATTACHMENT TO LICENSE AMENDMENT NOS. 174 AND 170

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

DOCKET NOS. 50-237 AND 50-249

Revise the Appendix "A" Technical Specifications by replacing the pages identified below with the enclosed pages. The revised pages are identified by amendment number and contain a vertical line indicating the area of change.

REMOVE	INSERT
3/4.8-1	3/4.8-1
3/4.8-3	3/4.8-3
B3/4.8-1	B3/4.8-1

3.8 - LIMITING CONDITIONS FOR OPERATION

A. Containment Cooling Service Water System

1. Containment Cooling

   Two independent containment cooling service water (CCSW) subsystems, with each subsystem comprised of:

   a. Two OPERABLE CCSW pumps, and

   b. An OPERABLE flow path capable of taking suction from the ultimate heat sink and transferring the water:

      1) Through one LPCI heat exchanger, and separately,

      2) To the associated safety related equipment,

   shall be OPERABLE, and

2. Control Room Emergency Ventilation (CREVS) Refrigeration Control Unit (RCU) support

   One Unit 2 CCSW pump and flow path shall be OPERABLE.

APPLICABILITY:

For Containment Cooling, OPERATIONAL MODE(s) 1, 2, and 3.

For CREVS RCU support, OPERATIONAL MODE(s) 1, 2, 3 and *.

4.8 - SURVEILLANCE REQUIREMENTS

A. Containment Cooling Service Water Syst m

Each of the required CCSW subsystem shall be demonstrated OPERABLE at least once per 31 days by verifying that each valve, manual or power operated, in the flow path that is not locked, sealed or otherwise secured in position, is in its correct position.

* When handling irradiated fuel in the Secondary Containment, during CORE ALTERATION(s), and operations with a potential for draining the reactor vessel.

3.8 - LIMITING CONDITIONS FOR OPERATION

2. In OPERATIONAL MODE(s) 1,2,3 and * with the CCSW pump or flow path which is associated with the safety related equipment required OPERABLE by Specification 3.8.D inoperable, declare the associated safety related equipment inoperable and take the ACTION required by Specification 3.8.D.

4.8 - SURVEILLANCE REQUIREMENTS

* When handling irradiated fuel in the secondary containment, during CORE ALTERATION(s), and operations with a potential for draining the reactor vessel.

BASES

3/4.8.A Containment Cooling Service Water System

The containment cooling service water system, with the ultimate heat sink, provides sufficient cooling capacity for continued operation of the containment cooling system and of other safety-related equipment (e.g., CCSW keep-fill, the control room emergency ventilation system refrigeration unit which can be supplied by any single Unit 2 CCSW pump), during normal and accident conditions. The redundant cooling capacity of the system, assuming a single failure, is consistent with the assumptions used in the safety analysis to keep the accident conditions within acceptable limits. Since only two of the four pumps is required to provide the necessary cooling capacity, a thirty day repair period is allowed for one pump out of service. OPERABILITY of this system is also dependent upon special measures for protection from flooding in the condenser pit area.

3/4.8.B Diesel Generator Cooling Water System

The diesel generator cooling water system, with the ultimate heat sink, provides sufficient cooling capacity for continued operation of the diesel generators during normal and accident conditions. The cooling capacity of the system is consistent with the assumptions used in the safety analysis to keep the accident conditions within acceptable limits.

3/4.8.C Ultimate Heat Sink

The canals provide an ultimate heat sink with sufficient cooling capacity to either provide normal cooldown of the units, or to mitigate the effects of accident conditions within acceptable limits for one unit while conducting a normal cooldown on the other unit.

3/4.8.D Control Room Emergency Ventilation System

The control room emergency filtration system maintains habitable conditions for operations personnel during and following all design basis accident conditions. This system, in conjunction with control room design, is based on limiting the radiation exposure to personnel occupying the room to five rem or less whole body, or its equivalent.

The frequency of tests and sample analysis is necessary to show that the HEPA filters and charcoal adsorbers can perform as evaluated. The control room emergency filtration system in-place testing procedures are established utilizing applicable sections of ANSI N510-1980 standard. Operation of the system with the heaters OPERABLE for ten hours a month is sufficient to reduce the buildup of moisture on the adsorbers and HEPA filters. The charcoal adsorber efficiency test procedures allow for the removal of one representative sample cartridge and testing in accordance with the guidelines of ASTM-D-3803-89. The sample is at least two inches in diameter and has a length equivalent to the thickness of the bed. If the iodine removal efficiency

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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 174 TO FACILITY OPERATING LICENSE NO. DPR-19

AND AMENDMENT NO. 170 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 May 20, 1999, as supplemented by letters dated September 8, September 16, and September 20, 1999, Commonwealth Edison Company (ComEd, the licensee) requested a license amendment for Dresden Nuclear Power Station, Units 2 and 3. The proposed license amendment would change the Technical Specifications (TSs) to revise the minimum water level in the suppression chamber, and to clarify the Containment Cooling Service Water (CCSW) System requirements as a support system for the Control Room Emergency Ventilation System (CREVS). The September 8, September 16, and September 20, 1999, submittals provided clarifying information that did not change the initial proposed no significant hazards consideration determination.

This Safety Evaluation only addresses the proposed change to the CCSW requirements. The change to the suppression chamber water level is unrelated to the CCSW change and will be addressed in a separate licensing action.

2.0 EVALUATION

The proposed TS change is to TS 3/4.8.A, "Containment Cooling Service Water," but the primary impact is on the control room (CR) habitability system. The control room heating, ventilation and air conditioning (HVAC) receives cooling water from CCSW and service water (SW). These systems are described below.

System Design

The CR habitability systems are designed to ensure that control room operators are able to remain in the control room, operate the plant safely under normal conditions, and maintain the plant in a safe condition under accident conditions. The habitability systems consist of systems and equipment which protect the control room operators against such postulated releases as radioactive materials, toxic gases, and smoke. The Dresden CREVS, which includes the safety-related train of CR HVAC, is described in Sections 6.4 and 9.4 of the Updated Final Safety Analysis Report (UFSAR). The Dresden CR is shared between Units 2 and 3.

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The control room habitability systems are designed so that radiation exposure of control room personnel does not exceed limits of NUREG-0800, "Standard Review Plan" (SRP) 6.4, or 10 CFR Part 50, Appendix A, General Design Criterion (GDC) 19. GDC 19 and SRP 6.4 require adequate radiation protection to permit access to and occupancy of the CR under accident conditions without personnel receiving exposures in excess of 5 rem whole body or its equivalent to any part of the body for the duration of the design-basis accident (DBA).

The CR HVAC system consists of two independent HVAC subsystems sharing some common ductwork: one multizone subsystem (Train A) and one single zone subsystem (Train B). The system was modified to meet the intent of NUREG-0737, "Clarification of TMI Action Plan Requirements," Action Item III.D.3.4, "Control Room Habitability." The system design relies on non-safety related (NSR) components to provide redundancy in CR cooling.

Train A is the primary temperature control and air distribution subsystem for the control room emergency zone. Train A is NSR and is used during normal operation. CR cooling is provided by two, 50 percent capacity, 45-ton chilled water compressors which are NSR and are not normally aligned to receive power from an emergency diesel generator (EDG). The cooling water for Train A is from SW. Train A can be operated in the event of a loss of offsite power (LOOP) if the 4-kV nonessential switchgear is backfed.

Train B of CR HVAC is the safety-related (SR) portion of the system and is used as a backup for Train A. Train B is initiated if Train A is out-of-service, or in the accident-response modes of CREVS. CR cooling is provided by a single, 90-ton compressor. Cooling water is normally provided by the SW system; however, upon a loss of SW operators manually align Unit 2 CCSW to cool the compressor. The air distribution from each train is aligned through the use of air-operated isolation dampers. These dampers fail to the Train B mode since Train B is powered from a Unit 2 emergency bus and is available in the event of a LOOP.

CREVS is not modeled in the Dresden probabilistic risk assessment based individual plant examination (IPE). The Dresden IPE states that because of the redundant supplies of cooling water and because of procedural controls, loss of main control room ventilation is judged to have an insignificant impact on modeled equipment failure rates or on modeled human error probabilities (HEPs). Loss of control room ventilation is not expected to lead to control room evacuation or either an automatic or manual reactor scram. In response to the staff's questions about the CR HVAC being a support system for other systems that are needed to prevent core damage, ComEd stated that most of the safety-significant switchgear is not located in the CR envelope. Instead, the switchgear is located in open areas of the plant where the temperature is not expected to exceed 120 degrees Fahrenheit. Therefore, loss of ventilation in these areas was not warranted as a support system based initiator for the Dresden IPE. Furthermore, neither modification of HEPs (due to temperature concerns) nor addition of HVAC basic events to relevant fault trees was warranted. By letter dated October 2, 1997, the staff determined that ComEd's response was sufficient and that the Dresden IPE met the intent of Generic Letter 88-20.

The CCSW system is a SR, open loop cooling water system consisting of four CCSW pumps and associated valves, piping, controls and instrumentation for each unit. The CCSW system provides cooling water for the containment cooling heat exchangers during both accident and

non-accident conditions. The system piping is arranged in two separate loops, each with two pumps and a heat exchanger. At the heat exchanger, heat is transferred from the low pressure coolant injection (LPCI) subsystem to the CCSW system. During normal plant operation, the CCSW system is not operating. Following an accident or other plant evolution which requires containment heat removal, the CCSW system is manually started. The Unit 2 CCSW pumps are powered from 4 kV buses 23 and 24. These buses are manually back-fed from EDGs which can supply the necessary loads in the event of a LOOP. Four CCSW pumps are located in the turbine buildings. Two of the four CCSW pumps (pumps B and C) are located in a single, common watertight vault for flood protection. To prevent the CCSW pump motors from overheating, the vault has two vault coolers. The cooling water for each vault cooler is provided from its respective CCSW pump discharge. Only Unit 2 CCSW loops provide a SR source of water to the SR control room HVAC condensers.

SW is a NSR open system designed to provide strained river water for various plant equipment. The system consists of five pumps, three strainers, and a common distribution header. Two SW pumps are provided on each unit and the fifth shared pump is used as a backup. Normally, two pumps and one strainer for each unit are in operation, while the fifth pump and one strainer are in standby. The system is cross-tied between Units 2 and 3. The SW pumps are powered by 4 kV buses 23(33) and 24(34). The 2/3 SW pump can be powered by either Unit 2 or Unit 3. There are no automatic features for the SW pumps. In the event of a loss of all AC power, the operator can manually start a SW pump on EDG power after securing a safe shutdown of a unit (no emergency core cooling in operation). SW is not necessary for a safe shutdown of the units, but it is needed to attain a normal cold shutdown condition. The SW system provides the normal source of cooling water to both the SR and NSR trains of CR HVAC.

In summary, the CR HVAC that supports CREVS is a single train system (Train B) with no redundant SR equipment. Support systems include NSR cooling water to the compressor, which is normally provided from SW from Unit 2 and/or Unit 3. Either subsystem of Unit 2 CCSW can be aligned to provide a SR source of cooling water for CREVS. Electrical power for CREVS and for CCSW pumps 2C and 2D is provided by SR bus 24-1 that is normally fed by the Unit 2 EDG upon loss-of-power. Electrical power for CCSW pumps 2A and 2B is provided by SR bus 23-1 that is normally fed by the Unit 2/3 EDG upon loss-of-power. The SW pumps, which are not normally aligned to the EDGs, are not immediately available on either unit, so that Unit 2 CCSW is used in the event of a LOOP. If needed, the SW pumps and/or Train A of CR HVAC can be run from the EDGs if emergency core cooling system (ECCS) loads are not required.

In 1983, the staff reviewed Dresden's CR habitability against the criteria in SRP Sections 2.2.1, 2.2.2, 2.2.3 and 6.4, and Regulatory Guides 1.78 and 1.95. By letter dated May 11, 1983, the staff approved the CREVS design as meeting the intent NUREG-0737, Item III.D.3.4. At that time, no TSs were added related to the cooling function of CREVS.

Technical Specifications for CREVS

As a result of findings by a Diagnostic Evaluation Team inspection performed by the NRC staff at Dresden in 1987, ComEd decided that both Dresden and its sister site, Quad Cities Nuclear Power Station (Quad Cities) needed attention focused on their TS.

ComEd initiated the Technical Specification Upgrade Program (TSUP) for both Dresden and Quad Cities Stations. The licensee evaluated the then-current TSs for both Dresden and Quad Cities against the Standard Technical Specifications (STS) contained in NUREG-0123, "Standard Technical Specifications General Electric Plants BWR/4." The licensee proposed numerous improvements such as clarifying requirements, changing the TS to make them more understandable and to eliminate interpretation, and deleting requirements that were no longer considered current. ComEd updated both the Dresden and Quad Cities TS based on the STS contained in NUREG-0123. The final amendment related to TSUP was approved by the staff by letter dated June 28, 1996.

During the TSUP, ComEd adopted TS related to the cooling function of CREVS. ComEd modeled the specifications for safety-related service water (CCSW at Dresden and Residual Heat Removal Service Water (RHRSW) at Quad Cities) after NUREG-0123, and kept the wording the same between Dresden and Quad Cities.

Specification 3.8.A for Dresden and Quad Cities are similar in that Dresden's CCSW and Quad Cities RHRSW perform the containment cooling functions for their respective stations. At Quad Cities, RHRSW is also needed to perform the Decay Heat Removal function. Furthermore, like Dresden's CCSW system, the Quad Cities RHRSW provides backup cooling to CREVS; however, at Quad Cities the cooling water comes from one train of RHRSW from each unit, whereas at Dresden the cooling water can only be supplied from the Unit 2 CCSW. ComEd modeled TS 3/4.8.A for both stations after the Quad Cities system configuration.

Currently, Dresden TS 3.8.A requires four CCSW pumps in two operable CCSW trains when a unit is in Modes 1, 2, or 3. During irradiated fuel movement and operations with the potential to drain the reactor vessel (Mode *), TS 3.8.A requires "the subsystem(s) associated with subsystems/loops and components required OPERABLE by Specification 3.8.D (CREVS)." TS 3.8.A defines a subsystem as (1) two operable CCSW pumps, and (2) an operable flow path through a LPCI heat exchanger and to the associated safety-related equipment. This TS structure implies that two pumps and one LPCI heat exchanger need to be operable during Mode * to support CREVS. According to ComEd, this TS structure overstates the CCSW requirements in support of CREVS when Unit 2 is in Mode * and does not adequately describe the system requirements in Modes 1, 2 and 3.

Evaluation of Proposed Change

ComEd proposed to revise TS 3/4.8.A to clarify the CCSW requirements as follows: (1) two CCSW subsystems, each comprised of two CCSW pumps, a LPSI heat exchanger, and a flow path to the associated safety-related equipment, is required to be OPERABLE in Modes 1, 2 and 3 to support containment cooling; and (2) any one of the four Unit 2 CCSW pumps and the associated [illegible] path is required to be OPERABLE in Modes 1, 2, 3 and * to support CREVS. In addition, T[illegible].8.A, Action 2, was revised to clarify that the actions in TS 3/4.8.D, "Control Room Emergency Ventilation System," are followed if the Unit 2 CCSW pump is inoperable in Modes 1, 2, 3 or *.

The staff reviewed the proposed change and the design of the Dresden systems. The staff determined that, for containment cooling support, the proposed TS meets the system

requirements for CCSW and is, therefore, acceptable. For CREVS support the staff determined that the proposed TS meets the system requirements with the following clarifications:

CCSW Minimum Flow Requirements: In response to the staff's questions, ComEd stated that the minimum flow to support long-term operation of a CCSW pump is 350 gpm, or 10 percent of design flow through a CCSW pump. Since the CREVS refrigeration control unit (RCU) only uses 121 gpm, other flow paths are needed for a CCSW pump to support the CREVS function. If a flow path through the LPCI heat exchanger is not available, ComEd stated that sufficient flow is achieved through use of other flow paths, including the CCSW pump vault coolers. Since the CCSW pump vault coolers are only available on CCSW pumps 2B and 2C, CCSW pumps 2A and 2D can only support CREVS if a flow path is available through the LPCI heat exchanger. In the September 16, 1999, submittal, ComEd stated that the Dresden UFSAR will be revised to clearly reflect the flowpath and minimum flow requirements of CCSW in support of CREVS. Any future changes to the UFSAR will be subject to the requirements of 10 CFR 50.59 and will be submitted to the NRC in accordance with the requirements of 10 CFR 50.71(e). The staff finds this to be an acceptable level of control for these system requirements.

Division I Power: In their submittal, ComEd proposed that any one of the four CCSW pumps 2A, 2B, 2C, or 2D may be used to meet TS requirements for CREVS. CCSW pumps 2C and 2D and CREVS are in electrical Division II. CCSW pumps 2C and 2D are, therefore, the pumps that are electrically associated with the CREVS subsystem and components required OPERABLE by TS 3.8.D. CCSW pumps 2A and 2B are in electrical Division I. If pumps 2A or 2B are the source of cooling for CREVS, the RCU function could be lost if either Division I or Division II power is lost whereas, if pumps 2C or 2D are used, only a loss of Division II power would cause the RCU to be lost. The station blackout (SBO) system as described in UFSAR Section 9.5.9 is a NSR independent source of additional onsite emergency AC power. Each unit has a diesel driven SBO EDG which is connectable to each units' SR 4kv bus. To compensate for any increased chance that the CREVS RCU could be lost due to a loss of power to pumps 2A or 2B, ComEd stated on September 27, 1999, that they would verify SBO availability, including connectability, whenever 2A or 2B CCSW pumps are the CCSW supply for CREVS TS 3.8.D OPERABILITY. ComEd also stated that the UFSAR will be revised to reflect that the 2A or 2B CCSW pumps are dependent on SBO availability when only pumps 2A or 2B are credited for TS 3.8.D OPERABILITY. Any future changes to the UFSAR will be subject to the requirements of 10 CFR 50.59 and will be submitted to the NRC in accordance with the requirements of 10 CFR 50.71(e). The staff finds this to be an acceptable level of control for these system requirements.

The staff reviewed the system configurations and the operator actions that are required post-accident to align the CREVS CR HVAC. The staff determined that, with the proposed changes to the TSs, the CREVS availability and operation will be consistent with design that was originally approved by the staff by letter dated May 11, 1983. The staff finds that the proposed changes to TS 3.8.A reflect the design of the Dresden CCSW system and provide an

acceptable level of redundancy in the CR HVAC function. The staff finds the proposed changes to TS 3.8.A and the associated Bases to be 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 a requirement with respect to the installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20. The NRC staff has determined that the amendments involve no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendments involve no significant hazards consideration, and there has been no public comment on such finding (64 FR 46426). Accordingly, the amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendments.

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: S. Bailey

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