

# Commonwealth Edison Company

ONE FIRST NATIONAL PLAZA ★ CHICAGO, ILLINOIS

Address Reply to:

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March 5, 1971

Dr. Peter A. Morris, Director  
Division of Reactor Licensing  
U.S. Atomic Energy Commission  
Washington, D.C. 20545

Regulatory

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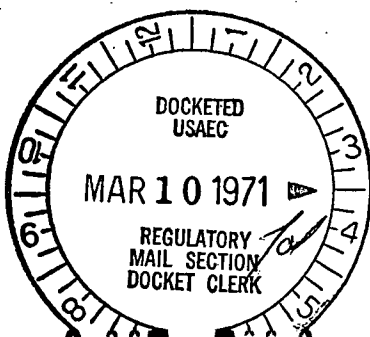
Subject: Proposed Change No. 9 to Appendix A  
DPR-19, AEC Dkt 50-237

Dear Dr. Morris:

Pursuant to Section 50.59 of 10 CFR Part 50 and paragraph 3.B of Facility License DPR-19, Commonwealth Edison hereby submits Proposed Change No. 9 to Appendix A of DPR-19 (Dresden Unit 2).

The purpose of this change is to update the Dresden Unit 2 Technical Specifications to the same level as the Dresden Unit 3 Technical Specifications. These changes encompass the entire Technical Specifications, except in certain areas which will be noted below:

- A - Definitions - A Definition J. has been added concerning Logic System Functional Testing.
- B - Specification 1.1 and 2.1 - These specifications were changed to conform with the Unit 3 specifications by Proposed Change No. 8. No further changes are being made in this submittal.
- C - Specification 3.1 and 4.1 - Table 3.1.1 has been revised to add operational requirements for the IRM inoperative trip and the APRM inoperative and downscale trips. Table 4.1.1 has been revised to add functional testing for the IRM inoperative trip and APRM inoperative downscale trips. In Table 4.1.2, the generator load rejection scram and the high water level scram discharge volume sensors have been deleted.
- D - Specification 3.2 and 4.2 - Specification 3.2.D.2 has been added concerning operating requirements of the steam jet air ejector off-gas monitors. Operating requirements for the containment spray interlock and isolation condenser have been added to Table 3.2.2. Calibration requirements for the containment spray interlock sensors and the isolation condenser have been added to Table 4.2.1.



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- E - Specification 3.3. and 4.3 - A new item 3.3.B.2 has been added concerning the number of rods which can be withdrawn from the core during a refueling outage. Items 4.3.B.1.a and 4.3.B.1.b have been added to include additional requirements on control rod drive following. Additional surveillance requirements have been added to Item 4.3.C concerning testing of control rod drives. Items 3.3.E and 4.3.E. have been changed to reflect the new wording concerning reactivity anomaly.
- F - Specification 3.4 and 4.4 - Specification 3.4.C has been modified to require temperature monitoring of the standby liquid control system piping.
- G - Specification 3.5 and 4.5 - Specifications 3.5.A.7, 3.5.B.3, and 4.5.B.3 have been modified to include additional requirements concerning containment cooling sprays.
- H - Specification 3.6 and 4.6 - Table 4.6.1 which specifies in-service frequencies and extent of inspection are the same for Dresden Units 2 and 3, except for the requirements concerning inspection of the feed and steam lines where specific welds have been indicated. The extent of the inspection on these particular lines is the same for Dresden Unit 2 and Unit 3.
- I - Specification 3.7 - Specification 3.7.A has been changed to allow containment leak rate testing at either 25 or 48 pounds. Specification 3.7.B has been revised to include requirements for diesel generator operability as well as the standby gas treatment system. Specifications 3.7.D and 4.7.D have been revised to include operational and surveillance requirements on instrument line flow check valves.
- J - Specification 3.8 - The requirements which were recently submitted to the AEC as Proposed Change No. 1 to DPR-25 have been incorporated in this section of the Technical Specifications.
- K - Specification 3.9 and 4.9 - This specification is essentially the same as the Unit 3 specification except in those areas concerning sources of off-site power to Dresden Unit 2 which are different from Dresden Unit 3.
- L - Specification 3.10 and 4.10 - Specification 3.10.D has been revised to allow maintenance on more than one control rod drive during a refueling outage.

Section 50.59 of 10 CFR Part 50 and Paragraph 3.B of Facility License DPR-19 require the submission of an appropriate Safety Analysis Report in support of a proposed change to Appendix A of DPR-19. No Safety Analysis Report is being provided for this proposed change, since it is an updating of the Dresden Unit 2 Technical Specifications to an existing approved Technical Specification (DPR-25, Appendix A).

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In our opinion, the proposed change does not result in hazards different from or greater than those analyzed in the Final Safety Analysis Report. Specifically, there is (1) no increase in the probability of, or (2) no increase in the possible consequences of, or (3) no creation of a credible probability of an accident or equipment malfunction different from those previously evaluated in the FSAR. Therefore, the margin of safety as defined in the Bases for any Technical Specification is not reduced.

Proposed Change No. 9 has been reviewed and approved by Commonwealth Edison's Nuclear Review Board.

In addition to three signed originals, 19 copies of Proposed Change No. 9 are also submitted.

Very truly yours,

*Byron Lee Jr.*

Byron Lee, Jr.  
Assistant to the President

SUBSCRIBED and SWORN to  
before me this 5<sup>th</sup> day  
of March, 1971.

*Patricia A. Nelson*  
Notary Public