

Commonwealth Edison Company

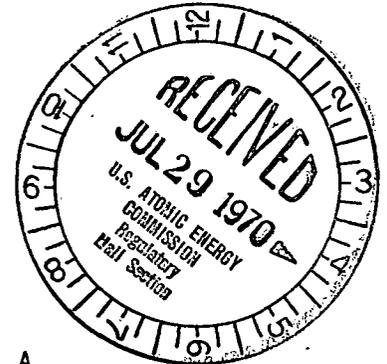
ONE FIRST NATIONAL PLAZA ★ CHICAGO, ILLINOIS

Address Reply to:

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July 29, 1970

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



Subject: Proposed Change No. 4 to Appendix A
of DPR-19, AEC Dkt 50-237

Dear Dr. Morris:

Regulatory

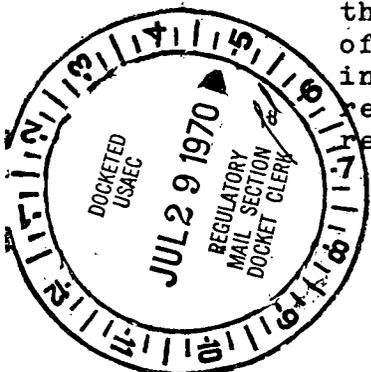
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Pursuant to 10 CFR 50.59 and paragraph 3.B of Facility License DPR-19, Commonwealth Edison hereby submits Proposed Change No. 4 to Appendix A of DPR-19 (Dresden Unit 2). The changes requested in this Proposed Change are in Section 3.7.A.2 on Primary Containment and the Bases thereto. The specific changes are as follows:

1. On page 119, delete Specification 3.7.A.2 in its entirety and replace with: "Primary containment integrity shall be maintained at all times when the reactor is critical or when the reactor water temperature is above 212°F with fuel in the reactor vessel, except:
 - a. While performing low power physics tests at atmospheric pressure during or after refueling at power levels not to exceed 5Mw(t).
 - b. When reactor water temperature is above 212°F, primary containment may be vented through the Standby Gas Treatment System as long as reactor water level is normal, the primary containment pressure is less than 2 psig, and the average annual airborne effluent release limits (Specification 3.8) are not exceeded.

2. On page 136, delete the first paragraph in Bases 3.7.A in its entirety and replace with:

"The integrity of the primary containment and operation of the emergency core cooling system in combination, limit the off-site doses to values less than those suggested in 10CFR100 in the event of a break in the primary system piping during reactor operation. Thus, primary containment integrity is required whenever the potential for such events exist, i.e.,



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whenever the reactor is critical or primary system temperature is above 212°F. Two exceptions to this requirement are allowable:

- a. While criticality tests are being conducted in association with a refueling outage, ready access to the reactor vessel is required. There will be no pressure on the system at this time, which will greatly reduce the chances of a pipe break. The reactor may be taken critical during this period; however, restrictive operating procedures will be in effect again to minimize the probability of an accident occurring. Procedures and Rod Worth Minimizer would limit control worth to less than 1.5% Δk . A drop of a 1.5% Δk does not result in any fuel damage. In addition, in the unlikely event that an excursion did occur, the reactor building and Standby Gas Treatment System, which shall be operational during this time, offer a sufficient barrier to keep off-site doses well within 10CFR100.
- b. During brief periods when reactor water temperature is above 212°F, primary containment venting is required in order to inert, deinert, or control gradual pressure buildup during reactor heating inside the drywell. Alternate controls must be applied in this case to insure that 10CFR20 guidelines are met while the venting is in progress and that if a primary system pipe break occurs, the expected sequence of events and consequences as elicited from the safety analyses will occur. Venting through the Standby Gas Treatment System during this time will fulfill these needs by providing highly efficient filtration of particulate and iodine activity. Following a leak or break in the primary system, entry to the drywell to determine leak location and corrective action is required. This can be accomplished before the reactor water temperature is less than 212°F by meeting the requirements set down in exception 2. This requirement would limit releases to the environs so that the limits of 10CFR20 are met and thus there is no threat to the health and safety of the public. If an increase in leakage occurs and drywell pressure exceeds 2 psig, isolation of the line to the SGTS occurs which terminates the release. The established procedures for sampling and monitoring the drywell will verify that releases initially will be well within average annual release limits and continuous stack monitoring during venting will insure continued conformance to these limits even if a primary system leak should develop. Additional measures to further reduce the possibility of an increase in activity during venting is provided by requiring that

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the drywell pressure be less than 2 psig and that water level be normal. Should a large pipe break develop during venting, automatic closure of the two isolation valves in series in the vent system at a drywell pressure of 2 psig will stop the release and protect the downstream ventilation equipment from a more severe environment, thus insuring normal treatment capability later."

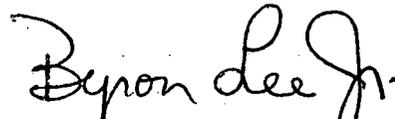
This change to the Technical Specifications is required to resolve the present conflict between Specification 3.7 and Specifications 3.1 and 3.2 which permit purging during inerting or deinerting of the drywell. It also represents a more detailed listing of the precautions and provisions that would be followed when venting during operation to further assure conformance to 10CFR20 guidelines.

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 Basis for any Technical Specification is not reduced.

Proposed Change No. 4 has been reviewed and approved by Commonwealth Edison's Nuclear Review Board.

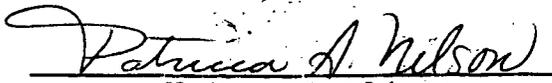
In addition to three signed originals, 19 copies of the Proposed Change are also submitted.

Very truly yours,



Byron Lee, Jr.
Assistant to the President

SUBSCRIBED and SWORN to
before me this 29th day
of July, 1970.



Patricia A. Nilson
Notary Public