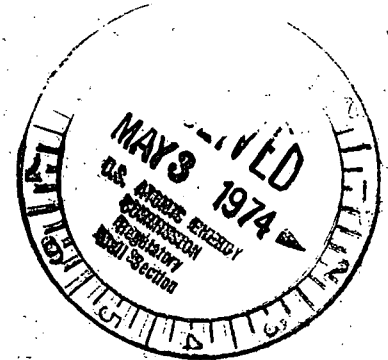




Commonwealth Edison
 One First National Plaza, Chicago, Illinois
 Address Reply to: Post Office Box 767
 Chicago, Illinois 60690

April 29, 1974



Regulatory

File Cy.

Mr. J. F. O'Leary, Director
 Directorate of Licensing
 Office of Regulation
 U.S. Atomic Energy Commission
 Washington, D.C. 20545

**Subject: Dresden Station Units 2 and 3 Proposed Change
 to Reactor Operating Licenses DPR-19 and DPR-25
 AEC Dkts 50-237 and 50-249**

Dear Mr. O'Leary:

Pursuant to Section 50.59 of 10CFR50 and Paragraph 3.B of full term Operating Licenses DPR-19 and DPR-25, Commonwealth Edison Company submits a proposed change to Appendix A of DPR-19 and Appendix A of DPR-25. The purpose of the proposed change is to clarify the surveillance requirements for the maintenance of Filled Discharge Pipe for the High Pressure Coolant Injection (HPCI) System. The bases for this change is Dresden Special Report No. 13 dated April 21, 1971 and Supplement to Special Report No. 13 dated May 13, 1971. This special report discusses the design and analysis of the systems for maintenance of full ECCS pump discharge piping and no requirement for HPCI system discharge pressure switches is specified. The proposed change is indicated on the attached revised pages -- DPR-19, Appendix A - Page 81A, and DPR-25, Appendix A - Page 81A.

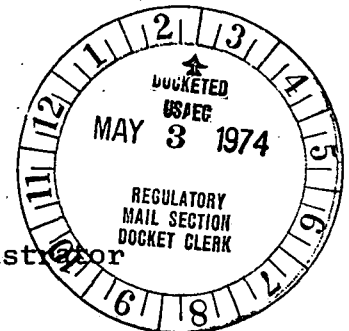
A safety evaluation of this change has been made. It has been concluded that no pressure switches are required on the HPCI discharge line because the entire line is below the elevation of the primary source of water. The pressure switch is not required to assure maintenance of a filled discharge pipe to preclude water hammer during system startup; therefore no unreviewed safety consideration is involved in this proposed Tech Spec change.

This proposed Tech Spec change has received Onsite and Offsite review and approval.

Three signed originals and 37 copies are submitted for your review and approval.

Very truly yours,

J. S. Abel
 J. S. Abel
 Nuclear Licensing Administrator
 Boiling Water Reactors



SUBSCRIBED and SWORN to
 Before me this 29th day
 of April, 1974.

Brenda Parnum
 Notary Public

2087.13946

3.5 LIMITING CONDITION FOR OPERATION

4.5 SURVEILLANCE REQUIREMENT

1. Every month prior to the testing of the LPCI and core spray systems, the discharge piping of these systems shall be vented from the high point and water flow observed.
2. Following any period where the LPCI or core spray subsystems have not been required to be operable, the discharge piping of the inoperable system shall be vented from the high point prior to the return of the system to service.
3. Whenever the HPCI system is lined up to take suction from the torus, the discharge piping of the HPCI shall be vented from the high point of the system and water flow observed on a monthly basis.
4. The pressure switches which monitor the LPCI and core spray system discharge lines to assure that they are full shall be functionally tested every month and calibrated every three months.

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