



**Commonwealth Edison**  
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February 28, 1979

Director of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Subject: Dresden Unit 2  
Proposed Amendment to DPR-19  
Appendix A, Technical Specifications  
concerning Hydraulic Snubber Inspections  
NRC Docket No. 50-237

Dear Sir:

An inspection of all twenty-eight (28) inaccessible safety-related hydraulic snubbers is required on a variable frequency by the Dresden Unit 2 Technical Specifications Section 4.6.I. The next inspection is required on March 10, 1979 -- the end of the 12 month +25% allowable surveillance interval established following startup from refueling on December 10, 1977.

Due to frozen water ways which are normally used for coal and oil deliveries to our fossil generating stations, shortages of these fuels currently exist and have caused us to reduce generation from these units as much as possible to conserve fuel. This condition is expected to continue through the time when snubber inspections are required on Unit 2. This situation was aggravated by the recent loss on February 23, 1979 of Dresden Unit 3 due to a main transformer failure, which will keep that unit down at least eight weeks.

In order to conserve fossil fuel reserves and maintain availability of our generating units to meet system load requirements, we must operate units which are not limited by fuel supplies as much as possible. For this reason, we are requesting a Technical Specification change for Dresden Unit 2 to extend the surveillance interval for hydraulic snubbers by one week. The required change is to be made on Page 91b of the Technical Specifications and is enclosed as Attachment 1. This change has received on-site and off-site review and approval.

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\$4,000.00

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We believe that extending the surveillance interval by one week does not cause any undue hazard to the health and safety of the public for the following reasons:

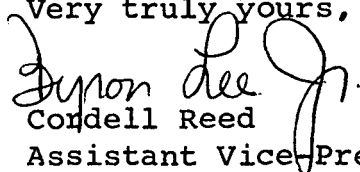
1. The majority of the snubbers (24 of 28) are installed to mitigate the consequences of the Design Basis Earthquake (DBE). The one week extension amounts to a 1½% increase in the surveillance interval, and the probability of the DBE occurring during this extension interval is extremely small.
2. The last two inspections of these snubbers revealed only one snubber which was inoperable. The March 18, 1977 inspection followed 365 days of operation and revealed no failed snubbers; the Fall 1977 inspection followed 195 days of operation and revealed the one inoperable snubber. This snubber was replaced with a mechanical type. Based on these favorable inspection results, failure of a large number of the snubbers since the last inspection is very unlikely.

Based on the above, we conclude that no undue safety hazards are created by extending the snubber surveillance one week.

Pursuant to 10 CFR 120, Commonwealth Edison has determined that this proposed amendment is Class III. As such, a fee remittance in the amount of \$4,000.00 has been enclosed.

Please address any additional questions concerning this matter to this office.

Very truly yours,

*for*   
Cordell Reed  
Assistant Vice-President

Enclosures

SUBSCRIBED and SWORN to  
before me this 28<sup>th</sup> day  
of February, 1979.  
Nancy M. Dasler  
Notary Public

### 3.6 LIMITING CONDITION FOR OPERATION

#### I. Shock Suppressors (Snubbers)

1. During all modes of operation except cold shutdown and refuel, all safety-related snubbers listed in Table 3.6.1 shall be operable except as noted in Specification 3.6.I.2 through 3.6.I.4.
2. From and after the time that a snubber is determined to be inoperable, continued reactor operation is permissible only during the succeeding 72 hours unless the snubber is sooner made operable or replaced.
3. If the requirements of 3.6.I.1 and 3.6.I.2 can not be met, an orderly shutdown shall be initiated and the reactor shall be in cold shutdown or refuel condition within 36 hours.
4. If a snubber is determined to be inoperable while the reactor is in the cold shutdown or refuel mode, the snubber shall be made operable or replaced prior to reactor startup.
5. Snubbers may be added to safety related systems without prior license amendment to Table 3.6.1 provided that a revision to Table 3.6.1 is included with the next license amendment request.

### 4.6 SURVEILLANCE REQUIREMENT

#### I. Shock Suppressors (Snubbers)

The following surveillance requirements apply to all hydraulic snubbers listed in Table 3.6.1.

1. All hydraulic snubbers whose seal material has been demonstrated by operating experience, lab testing or analysis to be compatible with the operating environment shall be visually inspected. This inspection shall include, but not necessarily be limited to, inspection of the hydraulic fluid reservoir, fluid connections, and linkage connection to the piping and anchor to verify snubber operability in accordance with the following schedule:

<u>No. of Snubbers Found Inoperable During Inspection Interval</u>	<u>Next Required Inspection Interval</u>
0	18 months $\pm$ 25%
1	12 months $\pm$ 25%
2	6 months $\pm$ 25%
3, 4	124 days $\pm$ 25%
5, 6, 7	62 days $\pm$ 25%
$\geq 8$	31 days $\pm$ 25%

The required inspection interval shall not be lengthened more than one step at a time.

The required inspection interval may be extended an additional seven days from March 10, 1979 to March 17, 1979.