



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

January 4, 1980

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

Subject: Dresden Station Units 2 and 3  
Proposed Amendment to Technical  
Specifications for Facility Operating  
Licenses DPR-19 and DPR-25 concerning  
Operability Requirements for Snubbers  
NRC Docket Nos. 50-237 and 50-249

Dear Sir:

Pursuant to 10 CFR 50.59, Commonwealth Edison Co. proposes to amend Appendix A, Technical Specifications, to Facility Operating Licenses DPR-19 and DPR-25 for Dresden Units 2 and 3, respectively. The proposed changes would allow extended time limits for inoperability of the ECCS ring header hydraulic snubbers.

The proposed changes are required to maintain the construction schedule for the Mark I containment torus external modifications. The snubber attachments to the torus are located such as to interfere with the installation of the torus external support saddles, and must be removed to perform the installation. A reanalysis has been performed to identify the effect of removal of the snubbers on the ring header response to accident conditions. The analysis indicates that with all six (6) pairs of snubbers inoperable, stresses remain below code allowable values for the normal operating plus operating basis earthquake (OBE) loads. To remain conservative, the proposed specification would allow only three (3) of six (6) pairs to be inoperable at anytime.

The proposed Technical Specification changes are enclosed in Attachments 1 and 2 for Dresden Units 2 and 3, respectively. These changes have received On-Site and Off-Site review and approval.

Pursuant to 10 CFR 170, Commonwealth Edison Co. has reviewed these changes and determined them to be one Class III and one Class I amendment. As such, a fee remittance in the amount of \$4,400.00 has been enclosed.

Because of the immediate construction schedule impact of these changes, your expeditious review is requested.

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\$ 4,400.00

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Director of Nuclear  
Reactor Regulation

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Please address any questions you may have concerning  
this matter to this office.

Three (3) signed originals and thirty-seven (37)  
copies of this transmittal are provided for your use.

Very truly yours,

*D L Peoples*

D. L. Peoples  
Director of Nuclear Licensing

SUBSCRIBED AND SWORN to  
before me this 4<sup>th</sup> day  
of January, 1980.

*Nancy M. Dascenzo*  
Notary Public