Commonwealth Edison
1400 Opus Place
Downers Grove, Illinois 60515

April 24, 1992

Dr. Thomas E. Murley, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Attn: Document Control Desk

Subject: Dresden Nuclear Power Station Units 2 and 3
Application for Amendment to
Facility Operating Licenses DPR-19 and DPR-25,
Appendix A, Technical Specifications
NRC Docket Nos. 50-237 and 50-249

Reference: J.L. Schrage memo to T.E. Murley
dated October 11, 1991

L. Olshan memo to T. Kovach, dated
February 14, 1992

Dear Dr. Murley:

Pursuant to 10 CFR 50.90, Commonwealth Edison (CECo) proposes to amend Appendix A, Technical Specifications, of Facility Operating Licenses DPR-19 and DPR-25. The proposed amendment requests the following changes to the Technical Specifications: 1) Section 6.2.B (Radiation Protection Procedure) has been deleted and replaced with new section 6.11 (Radiation Protection Program); 2) Sections 6.11 and 6.12 have been added to include sections defining a Radiation Protection Program and the requirements of a High Radiation Area, respectively; and, 3) The Table of Contents has been changed to reflect the two new pages (6.11-1 and 6.12-2). Dresden Station requests that the proposed amendment be approved prior to June 30, 1992 with an effective date of September 1, 1992 in order to implement the alternate methods for controlling access to High Radiation Areas.

The proposed changes to Dresden's Technical Specification are identical to changes proposed by CECo for Quad Cities in Reference (a) and approved by your staff in Reference (b). The only difference within Section 6.11 and 6.12 between Dresden's proposed package and Quad Cities' is specified as follows:

- DNPS 6.12.2 "...the keys shall be maintained under the administrative control of the Radiation Protection Supervisor."

- QCNPS 6.12.2 "...the keys shall be maintained under the administrative control of the Shift Foreman on duty and/or the health physics supervision."

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This change is administrative in nature and based upon differences in administrative philosophy at Dresden versus Quad Cities Stations. As such, the changes are minor and will not impact the implementation of the changes at Dresden.

The proposed amendment request is subdivided as follows:

1. Attachment A gives a description and safety analysis of the proposed changes in this amendment.

2. Attachment B includes the marked-up Technical Specification pages with the requested changes indicated.

3. Attachment C describes CECo's evaluation performed in accordance with 10 CFR 50.92 (c), which confirms that no significant hazards consideration is involved.

4. Attachment D provides the Environmental Assessment.

This proposed amendment has been reviewed and approved by CECo On-Site and Off-Site Review in accordance with Commonwealth Edison procedures.

To the best of my knowledge and belief, the statements contained above are true and correct. In some respect these statements are not based on my personal knowledge, but obtained information furnished by other Commonwealth Edison employees, contractor employees, and consultants. Such information has been reviewed in accordance with company practice, and I believe it to be reliable.

Commonwealth Edison is notifying the State of Illinois of this application for amendment by transmitting a copy of this letter and its attachments to the designated state official.

Please direct any questions you may have concerning this submittal to this office.

Very truly yours,

Peter L. Piet
Nuclear Licensing Administrator

Attachments:
A. Description of Safety Analysis of the Proposed Changes
B. Marked-Up Technical Specification Pages
C. Evaluation of Significant Hazards Considerations
D. Environmental Assessment

cc: A. Bert Davis, Regional Administrator - RIII
W.G. Rogers, Senior Resident Inspector - Dresden
B.L. Siegel, Project Manager - NRR
Office of Nuclear Facility Safety - IDNS

Signed before me on this 24th day of April, 1992, by _____.
Notary Public

" OFFICIAL SEAL "
SANDRA C. LARA
NOTARY PUBLIC, STATE OF ILLINOIS
MY COMMISSION EXPIRES 6/25/94

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ATTACHMENT A

DESCRIPTION AND SAFETY ANALYSIS OF PROPOSED CHANGES TO APPENDIX A, TECHNICAL SPECIFICATIONS OF FACILITY OPERATING LICENSES DPR-19 AND DPR-25

Description of the Proposed Change

The current requirements for control of high radiation areas (HRA) are governed by 10 CFR 20.203(c). This requirement states:

> "Each entrance or access point to a high radiation area shall be maintained locked except during periods when access to the area is required, with positive control over each individual entry."

Dresden Station currently complies with this regulation by requiring all areas greater than 100 mrem per hour to be locked, except during periods of access, or by providing direct surveillance to prevent unauthorized entry.

The requested revision would provide an alternate method of controlling unauthorized entry into high radiation areas, in lieu of the requirements of 10 CFR 20.203(c)(2) and (4). In addition, the requested revision would replace the existing Section 6.2.B (Radiation Protection Procedures) with Section 6.11 (Radiation Protection Program). These two changes affect page 6.2-14 of the current Technical Specifications and will add new pages.

The requested change deletes Section 6.2.B (Radiation Protection Procedures) and replaces it with Section 6.11 (Radiation Protection Program). This new section is consistent with Section 6.11 of the Standard Technical Specifications, as well as the existing Section 6.2.B. As such, this proposed change is administrative in nature.

The requested change also adds Section 6.12 to the Technical Specifications. This section would remove the current requirement for locking high radiation areas with dose rates equal to or greater than 100 mrem per hour as measured at 30 centimeters (cm) from the radiation source. In lieu of locking these areas or providing a control device and alarm signal as required by 10 CFR 20.203(c)(2)(ii) and (iii), each high radiation area in which the intensity of radiation is greater than 100 mrem per hour but less than 1000 mrem per hour shall be barricaded and conspicuously posted. Entrance to these areas shall be controlled by requiring the issuance of a Radiation Work Permit (RWP). The new section would also require that any individual or group of individuals entering such areas would be provided with or accompanied by one or more of the following:

- A radiation monitoring device which continuously indicates the radiation dose rate in the area; or
- A radiation monitoring device which continuously integrates the radiation dose rate in the area and alarms when a preset integrated dose is received. Entry into such areas with this monitoring device may be made after the dose rate levels in the area have been established and personnel have been informed of these levels; or

A Health Physics qualified individual (i.e., qualified in radiation protection procedures) with a radiation dose rate monitoring device will be responsible for providing positive control over activities within the area and performing periodic radiation surveillances at the frequency specified by Health Physics in the RWP.

The proposed changes also provide additional requirements for areas accessible to personnel with radiation levels greater than 1000 mrem per hour as measured at 30 cm. (11.8 inches). For areas with radiation levels greater than 1000 mrem per hour, the following requirements will be added:

Doors will remain locked except during periods of access by personnel under an approved RWP, which shall specify the dose rate in the immediate work areas and the maximum allowable stay time for individuals in the area. In lieu of the stay time specification, direct or remote continuous surveillance may be performed by qualified radiation protection personnel.

Where no enclosure exists for purpose of locking large areas, and where no enclosure can be reasonably constructed around the area, those areas shall be roped off, conspicuously posted and a flashing light shall be activated as a warning device.

Justification and Evaluation of the Proposed Change

The purpose of these Technical Specification changes is to allow an alternative method of controlling access to high radiation areas in lieu of methods specified by 10 CFR 20.203(c)(2) and (4). Pursuant to 10 CFR 20.203(c)(5), licensees may apply to the Commission for approval of alternative methods of controlling access to high radiation areas as long as such methods demonstrate that unauthorized entries into high radiation areas will be prevented.

The wording of the proposed changes is adopted from the Standard Technical Specifications (STS). The differences between the proposed sections and the STS are listed below:

- The Standard Technical Specifications require the dose rate measurement to be taken at 18 inches (45 cm.). Although the current version of 10 CFR 20 does not list a distance requirement, the revised version (implementation date of January 1, 1994) will list 30 cm. as the required distance for the dose rate measurement. Therefore, it is prudent to modify the Technical Specifications to meet the 30 cm. requirement.

- In Section 6.12.c, the title "Health Physicist" is utilized. Dresden Station uses the title "Health Physicist" for degreed personnel. The comparable function at Dresden is "Health Physics."

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In 1988, the Commission issued NRC Information Notice No. 88-79 ("Misuse of Flashing Lights for High Radiation Area Controls"). This Information Notice discussed an apparent lack of understanding of the Technical Specification requirements for HRA access control on the part of workers and supervisors. This lack of understanding lead to five high radiation area access control events.

The Information Notice also stated: "The NRC recognized that requiring power reactor licensees to lock all areas that exceeded 100 mrem per hour was not appropriate because of the large number of such areas, as well as the general state of sophistication of the typical radiation protection program (which includes RWP controls, surveillance programs, comprehensive worker training, and professional technical HP staff among others." The NRC has approved Technical Specification amendments for some power reactor licensees allowing them to lock only areas with dose rates of 1000 mrem per hour or greater, provided that additional specified controls were implemented.

Dresden Station has approximately 109 controlled access areas with dose rates greater than 100 mrem per hour. No more than 69 of these areas have dose rates greater than 1000 mrem per hour. The proposed changes will reduce the number of HRAs which are required to be locked, and establish controls commensurate with the potential radiological hazard in areas with dose rates between 100 mrem per hour and 1000 mrem per hour. These controls include the RWP program and advanced electronic dosimetry. The RWP program requires a daily review and indication of acceptance by an individual of each RWP that the individual will be working under. This programmatic control measure is supplemented with the issuance of an integrating and alarming electronic dosimeter to each individual, prior to entry into the Radiologically Controlled Area (RCA).

Relaxation of the locking requirement will also allow the station to more effectively control access to the areas with potentially significant dose rates (ie: greater than 1000 mrem per hour). A reduction in the number of locked access points will allow the station to better allocate surveillance and maintenance resources to those HRA access points with the greatest potential for a significant inadvertent exposure. This in turn will help ensure that the control mechanism at these points is operable at all times, and therefore, that unauthorized entry into these areas (due to a door left unlocked, or a faulty locking mechanism) is prevented.

The proposed Technical Specification amendment provides an alternative requirement for controlling access to high radiation areas. The proposed change does not alter the occupancy of personnel in high radiation areas, only the method used to control access. Thus, there is no increase in individual or cumulative occupational radiation exposure. Therefore, the proposed change is administrative in nature and has no impact on plant safety or systems as described in the UFSAR, and as such, the previous safety analyses and assumptions remain bounding.

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ATTACHMENT B

PROPOSED CHANGES TO APPENDIX A, TECHNICAL SPECIFICATIONS OF FACILITY OPERATING LICENSES DPR-19 AND DPR-25

REVISED PAGES

UNIT TWO (DPR-19)	UNIT THREE (DPR-25)
vi	vi
6-14	6-14
6-15	6-15
6-26	6-25
INSERT Page	INSERT Page

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DPR-19

1. Page vi

   Insert Sections 6.11 and 6.12 into the Table of Contents

2. Page 6-14

   A. Radiation Protection Procedures

      Deletion Section 6.2.B "Radiation Protection Procedures"

   B. 6.2.C.1 Procedure Review

      Delete "6.2.B"

      Insert "6.11"

3. Page 6-15

   A. 6.2.C.2 Procedure Review

      Delete "6.2.B"

      Insert "6.11"

   B. 6.2.D Temporary Changes to procedures

      Delete "6.2.B"

      Insert "6.11"

4. Page 6-26

   A. Radiation Protection Program

      Insert Section 6.11 "Radiation Protection Program"

   B. High Radiation Area

      Insert Section 6.12 "High Radiation Area"

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ATTACHMENT B (continued)

DPR-25

1. Page vi

   Insert Sections 6.11 and 6.12 into the Table of Contents

2. Page 6-14

   A. Radiation Protection Procedures

      Deletion Section 6.2.B "Radiation Protection Procedures"

   B. 6.2.C.1 Procedure Review

      Delete "6.2.B"

      Insert "6.11"

   C. 6.2.C.2 Procedure Review

      Delete "6.2.B"

      Insert "6.11"

3. Page 6-15

   A. 6.2.D Temporary Changes to procedures

      Delete "6.2.B"

      Insert "6.11"

   B. 6.2.D Temporary Changes to procedures

      Delete "6.2.B"

      Insert "6.11"

4. Page 6-25

   A. Radiation Proctection Program

      Insert Section 6.11 "Radiation Protection Program"

   B. High Radiation Area

      Insert Section 6.12 "High Radiation Area"

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