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6.11 Radiation Protection Program  
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 APPROPRIATE

6.0 ADMINISTRATIVE CONTROLS (Cont'd.)

8. Tests and experiments.
9. Procedures to ensure safe shutdown of the plant.
10. Station Security Plan and implementing procedures.
11. Fire Protection Program implementation.
12. ODCM implementation.
13. PCP implementation.
14. Working hours of the Shift Engineer, Station Control Room Engineer, Shift Foreman, and Nuclear Station Operator job classifications such that the heavy use of overtime is not routinely required.

B. Radiation control procedures shall be maintained, made available to all station personnel and adhered to. These procedures shall show permissible radiation exposure and shall be consistent with the requirements of 10 CFR 20. This radiation protection program shall be organized to meet the requirements of 10 CFR 20.

DELETED

- C. 1. Procedures for items identified in Specification 6.2.A and any changes to such procedures shall be reviewed and approved by the Operating Engineer and the Technical Staff Supervisor in the areas of operation, fuel handling, or instrument maintenance, and by the Maintenance Assistant Superintendent and Technical Staff Supervisor in the areas of plant maintenance and plant inspection. Procedures for items identified in Specification 6.2.B and any changes to such procedures shall be reviewed and approved by the Health Physics Services Supervisor. At least one person approving each of the above procedures shall hold a valid senior operator's license. In addition, these procedures and changes thereto must have authorization by the Station Manager (or designee) before being implemented.
2. Work and instruction type procedures which implement approved maintenance or modification procedures shall be approved and authorized by the Maintenance Assistant Superintendent where the written authority has been provided by the Production Superintendent. The "Maintenance/Modification Procedure" utilized for safety related work shall be so approved only if procedures referenced in the "Maintenance/Modification Procedure" have been approved as

6.11

6.0 ADMINISTRATIVE CONTROLS (Cont'd.)

required by 6.2.A. Procedures which do not fall within the requirements of 6.2.A or 6.2.B may be approved by the Department Heads.

6.11

D. Temporary changes to procedures 6.2.A and 6.2.B above may be made provided:

1. The intent of the original procedure is not altered.
2. The change is approved by two members of the plant management staff, at least one of whom holds a Senior Reactor Operator's License on the unit affected.
3. The change is documented, reviewed by the On-site Review and Investigative Function and approved by the Station Manager (or designee) within 14 days of implementation.

E. Drills of the emergency procedures described in Specification 6.2.A.4 shall be conducted at the frequency specified in the Generating Station Emergency Plan. These drills will be planned so that during the course of the year, communication links are tested and outside agencies are contacted.

6.3 Action to be Taken in the Event of a Reportable Event in Plant Operation

Any reportable event shall be promptly reported to the Vice President BWR Operations or his designated alternate. The incident shall be promptly reviewed pursuant to Specification 6.1.G.2.a(5) and a separate report for each reportable event shall be prepared in accordance with the requirements of Specification 6.6.B.

6.4 Action to be Taken in the Event of a Safety Limit is Exceeded

If a safety limit is exceeded, the reactor shall be shut down immediately and reactor operation shall not be resumed until authorized by the NRC. The conditions of shutdown shall be promptly reported to the Vice President BWR Operations or his designated alternate. The incident shall be reviewed pursuant to Specification 6.1.G.1.a and 6.1.G.2.a and a separate report for each event shall be prepared in accordance with Specification 6.6.B.

6.5 Plant Operating Records


A. Records and/or logs relative in the following items shall be kept in a manner convenient for review and shall be retained for at least five years.

6.0 ADMINISTRATIVE CONTROLS (Cont'd.)

- d. An evaluation of the change which shows the predicted releases of radioactive materials in liquid and gaseous effluents and/or quantity of solid waste that differ from those previously predicted in the license application and amendments;
  - e. A comparison of the predicted releases of radioactive materials in liquid and gaseous effluents and in solid waste to the actual releases for the period in which the changes were made;
  - f. An estimate of the exposure to plant operating personnel as a result of the change; and
  - g. Documentation of the fact that the change was reviewed and found acceptable by the On-site Review Function.
2. The change shall become effective upon review and acceptance by the On-site Review Function.



INSERT A



INSERT B

INSERT A

6.11 RADIATION PROTECTION PROGRAM

6.11.1 Procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR Part 20 and shall be approved, maintained, and adhered to for all operations involving personnel radiation exposure.

INSERT B

6.12 HIGH RADIATION AREA

6.12.1 In lieu of the "control device" or "alarm signal" required by paragraph 20.203(c)(2) of 10CFR Part 20, each high radiation area in which the intensity of radiation is greater than 100 mrem/hr but less than 1000 mrem/hr shall be barricaded and conspicuously posted as a high radiation area and entrance thereto shall be controlled by requiring issuance of a Radiation Work Permit (RWP)\*. Any individual or group of individuals permitted to enter such areas shall be provided with or accompanied by one or more of the following:

- a. A radiation monitoring device which continuously indicates the radiation dose rate in the area.
- b. 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 made knowledgeable of them.
- c. A health physics qualified individual (i.e., qualified in radiation protection procedures) with a radiation dose rate monitoring device who is responsible for providing positive control over the activities within the area and shall perform periodic radiation surveillance at the frequency specified by Health Physics in the RWP.

6.12.2 In addition to the requirements of Specification 6.12.1, areas accessible to personnel with radiation levels such that a major portion of the body could receive in one hour a dose greater than 1000 mrem shall be provided with locked doors to prevent unauthorized entry, and the keys shall be maintained under the administrative control of the Radiation Protection Supervisor. Doors shall remain locked except during periods of access by personnel under an approved RWP which shall specify the dose rate levels in the immediate work area and the maximum allowable stay time for individuals in that area.

For individual areas accessible to personnel with radiation levels such that a major portion of the body could receive in one hour a dose in excess of 1000 mrem\*\* that are located within large areas, such as the containment, where no enclosure exists for purposes of locking, and no enclosure can be reasonably constructed around the individual areas, then that area shall be roped off, conspicuously posted, and a flashing light shall be activated as a warning device. In lieu of the stay time specification of the RWP, continuous surveillance, direct or remote (such as use of closed circuit TV cameras), may be made by personnel qualified in radiation protection procedures to provide positive exposure control over the activities within the area.

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\* Health Physics personnel or personnel escorted by health physics personnel shall be exempt from the RWP issuance requirements during the performance of their assigned radiation protection duties, provided they are otherwise following plant radiation protection procedures for entry into high radiation areas.

\*\* Measurement made at 30 cm (11.8 in) from the source of radioactivity.

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6.11 Radiation Protection Program  
 6.12 High Radiation Area

NUMBER AS  
 APPROPRIATE

6.0 ADMINISTRATIVE CONTROLS (Cont'd.)

10. Station Security Plan and implementing procedures.
11. Fire Protection Program implementation.
12. ODCM implementation.
13. PCP implementation.
14. Working hours of the Shift Engineer, Station Control Room Engineer, Shift Foreman, Nuclear Station Operator job classifications such that the heavy use of overtime is not routinely required.

B. Radiation control procedures shall be maintained, made available to all station personnel and adhered to. These procedures shall show permissible radiation exposure and shall be consistent with the requirements of 10 CFR 20. This radiation protection program shall be organized to meet the requirements of 10 CFR 20.

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- C. 1. Procedures for items identified in Specification 6.2.A and any changes to such procedures shall be reviewed and approved by the Operating Engineer and the Technical Staff Supervisor in the areas of operation, fuel handling, or instrument maintenance, and by the Maintenance Assistant Superintendent and Technical Staff Supervisor in the areas of plant maintenance and plant inspection. Procedures for items identified in Specification 6.2.B and any changes to such procedures shall be reviewed and approved by the Health Physics Services Supervisor. At least one person approving each of the above procedures shall hold a valid senior operator's license. In addition, these procedures and changes thereto must have authorization by the Station Manager (or designee) before being implemented.
2. Work and instruction type procedures which implement approved maintenance or modification procedures shall be approved and authorized by the Maintenance Assistant Superintendent where the written authority has been provided by the Production Superintendent. The "Maintenance/Modification Procedure" utilized for safety related work shall be so approved only if procedures referenced in the "Maintenance/Modification Procedure" have been approved as required by 6.2.A. Procedures which do not fall within the requirements of 6.2.A or 6.2.B may be approved by the Department Heads.

G.11

G.11



6.0 ADMINISTRATIVE CONTROLS (Cont'd.)

D. Temporary changes to procedures 6.2.A and 6.2.B above may be made provided:

1. The intent of the original procedure is not altered.
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A. Records and/or logs relative to the following items shall be kept in a manner convenient for review and shall be retained for at least five years.

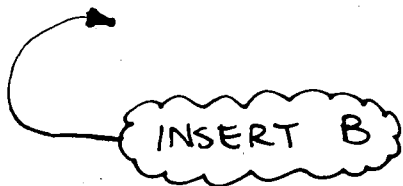
1. Records of normal plant operation, including power levels and periods of operation at each power level.

6.0 ADMINISTRATIVE CONTROLS (Cont'd.)

- d. An evaluation of the change which shows the predicted releases of radioactive materials in liquid and gaseous effluents and/or quantity of solid waste that differ from those previously predicted in the license application and amendments;
  - e. A comparison of the predicted releases of radioactive materials in liquid and gaseous effluents and in solid waste to the actual releases for the period in which the changes were made;
  - f. An estimate of the exposure to plant operating personnel as a result of the change; and
  - g. Documentation of the fact that the change was reviewed and found acceptable by the On-site Review Function.
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INSERT A



INSERT B

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\*\* Measurement made at 30 cm (11.8 in) from the source of radioactivity.

## ATTACHMENT C

### EVALUATION OF SIGNIFICANT HAZARDS CONSIDERATION

Commonwealth Edison has evaluated this proposed amendment and determined that it involves no significant hazards considerations. According to 10 CFR 50.92(c), a proposed amendment to an operating license involves no significant hazards considerations if operation of the facility in accordance with the proposed amendment would not:

1. Involve a significant increase in the probability or consequences of an accident previously evaluated; or
2. Create the possibility of a new or different kind of accident from any accident previously evaluated; or
3. Involve a significant reduction in a margin of safety.

The proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated because:

The proposed change affects administrative controls exercised to restrict access to high radiation areas by plant personnel and does not affect plant system safety.

The proposed changes do not create the possibility of a new or different kind of accident from any accident previously evaluated because:

The proposed change affects administrative controls exercised to restrict access to high radiation areas by plant personnel and does not relate to plant system safety. Therefore, this change does not create the possibility of a new or different kind of accident previously evaluated.

The proposed changes do not involve a significant reduction in a margin of safety because:

The proposed change is administrative in nature and does not alter the manner in which equipment required for the safe operation of the plant is operated. There are no setpoint or operational limitations being altered or changed as a result of this revision. The changes will not affect the administrative limits in place and will not reduce the station's ability to enforce these limits. Therefore, this change has no effect on the margin of plant safety.

ATTACHMENT C (continued)

CONCLUSION

Guidance has been provided in 51.44 FR 7744 for the application of standards to license change requests for determination of the existence of significant hazards considerations. This document provides examples of amendments which are not likely considered to involve significant hazards considerations.

This proposed amendment does not involve a significant relaxation of the criteria used to establish safety limits, a significant relaxation of the bases for the limiting safety system settings or a significant relaxation of the bases for the limiting conditions for operations. The proposed changes are administrative in nature without consequence to the safety to the plant. Therefore, based on the guidance provided in the Federal Register and the criteria established in 10 CFR 50.92 (c), the proposed change does not constitute a significant hazards consideration.

ATTACHMENT D

**ENVIRONMENTAL ASSESSMENT STATEMENT APPLICABILITY REVIEW**

Commonwealth Edison has evaluated the proposed amendment against the criteria for the identification of licensing and regulatory actions requiring environmental assessment in accordance with 10 CFR 51.21. It has been determined that the proposed changes meet the criteria for a categorical exclusion as provided under 10 CFR 51.22(c)(9). This determination is based on the minimal effect to plant safety upon the change to the administrative radiation dose limits at which HRAs are locked. The unlocking of HRAs (with dose rates under 1000 mrem/hr) will not create a situation which will increase the amount of releases to the environment. It has been determined that the proposed amendment does not involve a significant hazards consideration. There will be no change in the volume, quantity, or type of release made offsite. Plant operation after implementation of the proposed change will have no unreviewed effect on the environment. Unlocking doors and entry ways of HRAs with dose rates less than 1000 mrem/hr will not result in increased environmental consequences and does not involve irreversible consequences beyond those already accepted by the NRC. Therefore, the Environmental Assessment Statement is not applicable for these changes.



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 Unit 2  
License Change for Reporting Requirements as  
Specified within Section 2.G. of License DPR-19  
NRC Docket No. 50-237

Reference: Teleconference between CECo (P. Piet) and  
US NRC (B. Siegel) dated February 26, 1992

Pursuant to 10 CFR 50.90, Commonwealth Edison (CECo) proposes to amend Facility Operating License DPR-19. The proposed licensed change clarifies the reporting requirements of Section 2.G of Operating License DPR-19. As currently written, Section 2.G specifies NRC notification for violations to any requirements specified in Section 2.C of the License. However, Section 2.C(2) to License DPR-19 includes requirements for Appendix A, Technical Specifications for Dresden Station. Section 2.G does not clearly define Dresden's responsibility for reporting to the NRC violations from the requirements of Appendix A, Technical Specifications beyond the specific reporting requirements already delineated within Dresden's Technical Specifications. As discussed with members of your staff during the referenced teleconference, it is not the intent of Section 2.G of License DPR-19 to require additional reporting requirements outside of those already specified within the Technical Specifications. Therefore, Commonwealth Edison proposes changing Section 2.G of License DPR-19 to clarify Dresden's reporting requirements.

Dresden's proposed change to License DPR-19 reflects current industry standards already in place and accepted by the Commission at other sites. The proposed license change is specified as follows:

- 2.G The licensee shall report any violations of the requirements contained in Section 2, Items C(1), C(3), and C(4) of this license in the following manner: initial notification shall be made within 24 hours to the NRC Operations Center via the Emergency Notification System with written follow-up within 30 days in accordance with the procedures described in 10 CFR 50.73(b),(c), and (e).



The proposed changes are purely administrative in nature and have no impact on plant operation or the safety analysis for Dresden Station. The changes proposed to License DPR-19 do not: 1) involve a significant increase in the probability or consequences of an accident previously evaluated; or 2) create the possibility of a new or different kind of accident from any accident previously evaluated; or 3) involve a significant reduction in a margin of safety. In addition, the proposed License change meets the criteria for categorical exclusion from environmental review per the requirements of 10 CFR 51.22 (c)(9).

The proposed license change 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 information contained within is 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 License change 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.

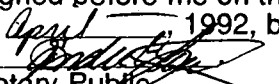
Sincerely,

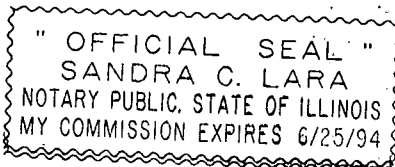


Peter L. Piet  
Nuclear Licensing Administrator

Attachment: Marked-up License Page

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

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



ATTACHMENT  
PROPOSED CHANGES TO  
OPERATING LICENSE DPR-19  
REVISED PAGE

Unit Two (DPR-19)

4

These exemptions granted pursuant to 10 CFR 50.12 are authorized by law, will not present an undue risk to the public health and safety, and are consistent with the common defense and security. With these exemptions, the facility will operate, to the extent authorized herein, in conformity with the application, as amended, the provisions of the Act, and the rules and regulations of the Commission.

- E. Commonwealth Edison Company shall implement and maintain in effect all provisions of the approved fire protection program as described in the Updated Final Safety Analysis Report for the facility and as approved in the Safety Evaluation Reports dated March 22, 1978 with supplements dated December 2, 1980, and February 12, 1981; January 19, 1983; July 17, 1987; September 28, 1987; and January 5, 1989, subject to the following provision:

The licensee may make changes to the approved fire protection program without prior approval of the Commission only if those changes would not adversely affect the ability to achieve and maintain safe shutdown in the event of a fire.

- F. The licensee shall fully implement and maintain in effect all provisions of the Commission approved physical security, guard training and qualification, and safeguards contingency plans including amendments made pursuant to provisions of the Miscellaneous Amendments and Search Requirements revisions to 10 CFR 73.55 (51 FR 27817 and 27822) and to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The plans, which contain Safeguards Information protected under 10 CFR 73.21, are entitled: "Dresden Nuclear Power Station Security Plan," with revisions submitted through October 30, 1990; "Dresden Nuclear Power Station Security Personnel Training and Qualification Plan," with revisions submitted through October 30, 1990; and "Dresden Nuclear Power Station Safeguards Contingency Plan," with revisions submitted through October 30, 1990. Changes made in accordance with 10 CFR 73.55 shall be implemented in accordance with the schedule set forth therein.

- G. Except as otherwise provided in the Technical Specifications, the licensee shall report any violations of the requirements contained in Section 2.C of this license in the following manner: initial notification shall be made within 24 hours to the NRC Operations Center via the Emergency Notification System with written follow-up within 30 days in accordance with the procedures described in 10 CFR 50.73(b), (c), and (e).

- H. The licensee shall have and maintain financial protection of such type and in such amounts as the Commission shall require in accordance with Section 170 of the Atomic Energy Act of 1954, as amended, to cover public liability claims.

, Items C(1), C(3), and C(4)