



Commonwealth Edison
1400 Opus Place
Downers Grove, Illinois 60515

May 13, 1992

Dr. Thomas E. Murley, Director
Office of Nuclear Reactor Regulation
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

- References: (a) P. Piet memo to T. Murley, dated April 24, 1992
(b) Teleconference between Commonwealth Edison (CECo)
(P. Piet) and the NRC (B. Siegel), dated May 8, 1992.

Dear Dr. Murley:

In the Reference (a) memo, Commonwealth Edison (CECo) transmitted a proposed license amendment to Section 2.G of the Dresden Unit 2 License DPR-19. The proposed change clarified the reporting requirement specifications within License DPR-19. As a result of the Reference (b) discussions, however, CECo proposes to provide our evaluation that the proposed amendment to License DPR-19 does not pose a Significant Hazards Condition. CECo's evaluation in accordance with 10 CFR 50.92 is provided as an attachment to this letter.

If there are any questions or concerns regarding this matter, please contact this office.

Sincerely,

Peter L. Piet
Nuclear Licensing Administrator

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Attachment

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

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ATTACHMENT

Significant Hazards Consideration

In accordance with 10 CFR 50.92, CECo has reviewed the proposed license amendment and concluded it does not involve a significant hazards consideration. The basis for this conclusion is that the three criteria of 10CFR50.92(c) are not compromised. The proposed amendment does not involve a significant hazards consideration because it would not:

1. Involve a significant increase the probability or consequences of an accident previously analyzed. The individual license condition discussed in Reference (a) is not warranted; therefore, the clarification of this license condition is appropriate and safe. As a result of the proposed amendment, there are no physical changes to the facility and all operating procedures, limiting conditions for operation (LCO), limiting safety system settings, and safety limits specified in the Technical Specifications will remain unchanged. The proposed change is an administrative reporting requirement clarification that does not in any way affect a previously analyzed accident.
2. Create the possibility of a new or different kind of accident from any previously evaluated. Since there are no changes in the way the plant is operated, the potential for an unanalyzed accident is not created. The proposed changes are administrative in nature and do not affect any accident initiators for Dresden Station. No new failure modes are introduced.
3. Involve a significant reduction in a margin of safety. Plant safety margins are established through LCOs, limiting safety system settings, and safety limits specified in the Technical Specifications. As a result of the proposed amendment, there will be no changes to either the physical design of the plant or to any of these settings and limits. The proposed changes are administrative and do not affect the safe operation of Dresden Station. Therefore, there will be no changes to any of the margins of safety.

Conclusion

Guidance has been provided in 51 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.