



Commonwealth Edison  
1400 Opus Place  
Downers Grove, Illinois 60515

10 CFR 50.90

September 2, 1992

Dr. Thomas E. Murley  
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 to Amendment to Facility Operating  
Licenses DPR-19 and DPR-25;  
Appendix A, Technical Specifications; Proposed  
Amendment to Table 3.7.1, "Primary Containment Isolation;"  
Generic Letter 91-08  
NRC Docket Nos. 50-237 and 50-249

Pursuant to 10 CFR 50.90, Commonwealth Edison (CECo) proposes to amend Appendix A, Technical Specification, of Facility Operating Licenses DPR-19 and DPR-25. The purpose of this amendment request is to delete Table 3.7.1, "Primary Containment Isolation," and modify 3/4.7.D per the requirements of Generic Letter 91-08. CECo requests approval of this amendment request within 90 days of receipt. It is requested that the proposed changes be made effective 30 days after approved or prior to startup from the D2R13 refueling outage, whichever comes first. D2R13 is scheduled to begin on January 4, 1993.

This proposed amendment 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 for Dresden and Quad Cities Station.
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.

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*Approval*  
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The proposed amendment has been reviewed and approved by CECo On-Site and Off-Site Review committees in accordance with company 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 attachment 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

Attachments:

- A. Description of Safety Analysis of the Proposed Changes
- B. Marked-up Technical Specification Pages
- C. Evaluation of Significant Hazards Consideration
- D. Environmental Assessment

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

Signed before me on this 2 day  
 of September 1992,  
 by Maryellen D. Long  
 Notary Public



## ATTACHMENT A

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

#### BACKGROUND

Dresden Nuclear Power Station Units 2 and 3 proposes to amend Facility Operating Licenses DPR-19 and DPR-25, respectively, to remove Technical Specification Table 3.7.1 that includes a list of components referenced in the individual specifications. In addition, the Technical Specification requirements have been modified such that any reference to this table have been removed. Finally, the Technical Specifications have been modified to state requirements in general terms that include the components listed in this table removed from the Technical Specifications. Guidance on the proposed changes was provided by Generic Letter (GL) 91-08, dated May 6, 1991. This request is similar to Duane Arnold Energy Center's September 20, 1991 request that was approved by the NRC staff on March 11, 1992.

#### DISCUSSION

Dresden Station proposes to remove Table 3.7.1 "Primary Containment Isolation." Reference to this table in Technical Specifications 3.7.D.1, 3.7.D.2, and 4.7.D.2 are also being deleted since with the removal of the table, deletion of the references is also necessary. This component list will be incorporated into plant procedures that are subject to the change control provisions for plant procedures in the Administrative Controls Section of the Technical Specifications. This is an acceptable alternative to identifying each component by its plant identification number in this table since the change control provisions of the Technical Specification provide an adequate means to control changes to these component lists although the lists are not in the Technical Specifications. The removal of this table (component list) is acceptable because it does not alter existing Technical Specification requirements or those components to which they apply. Dresden's proposal to remove Table 3.7.1, "Primary Containment Isolation," is specifically addressed in Generic Letter 91-08 and based upon the guidance from Generic Letter 91-08. Technical Specification 4.7.D.1 and 4.7.D.2 contain appropriate descriptions of the scope of the components to which the removed Technical Specification requirements apply. Since regulatory requirements and guidance further define the components and the testing involved and the Bases Section of the Technical Specifications already reference the applicable requirements, no further clarification is required.

The addition of a Limiting Condition for Operation (LCO) that addresses the operability of containment isolation valves is not necessary since Technical Specification Definition for Primary Containment Integrity (1.0.R) is being modified as follows:

1.0.R Primary Containment Integrity - Primary containment integrity means that the drywell and pressure suppression chamber are intact and all of the following conditions are satisfied:

1. All manual containment isolation valves on lines connecting to the reactor coolant system or containment which are not required to be open during an accident are closed **or comply with the requirements of Specification 3.7.D.**
2. At least one door in each airlock is closed and sealed.
3. All automatic containment isolation valves are operable or deactivated in the isolated position **or comply with the requirements of Specification 3.7.D.**
4. All blind flanges and manways are closed.

This states the operability requirements in general terms that apply to all containment isolation valves. Removal of Table 3.7.1 is consistent to the guidance of GL 91-08.

Footnote 1 from Table 3.7.1 was added to Technical Specification 3.7.D.2. The addition of this footnote is necessary because its content provides exceptions to Technical Specification requirements. Its addition is consistent to the guidance of GL 91-08.

There are other notes in Table 3.7.1 that are not being retained in the Technical Specifications because they are for information only and do not alter any Technical Specification requirements. Their removal would therefore not affect the applicability of the Technical Specification requirements and their addition to any section is not necessary. This is in accordance with the guidance of GL 91-08.

#### Dresden Administrative Technical Requirements

In order to provide control of this component list and other requirements of this nature that are removed from Technical Specifications, but still require administrative control, Dresden Station will include the control of this component list within the "Dresden Administrative Technical Requirements." Dresden Administrative Procedure (DAP) 02-20, "Control of the Dresden Administrative Technical Requirements (DATR's)" provides the guidelines for control and use of Dresden's Administrative Technical Requirements (DATR's). Any changes to DATR's, whether new or revised, will be reviewed and approved by the Onsite Review and Investigative Function, using the 10 CFR 50.59 change process. Technical Specification Table 3.7.1 will become a DATR, which will refer to Technical Specification 3.7/4.7 to assure compliance with Technical Specifications for the components required to be OPERABLE by LCO 3.7.D.2. Approved DATR's will be issued to each holder of official copies of Technical Specifications to ensure that DATR's are readily accessible for reference and use.

#### Editorial and Clarification Changes

The exemption of the RBCCW pathways from the requirements of 10 CFR 50, Appendix J referenced in Specification 3.7.A.2.b(1)(a) and 3.7.A.2.b(2)(a) is being deleted since this exemption has expired and is no longer needed. This change is being made for clarification and consistency throughout the Technical Specifications.

### Summary and Schedule

Therefore, Table 3.7.1 can be removed from the Technical Specifications with assurance that all primary containment isolation valves which are required to be operable will continue to be controlled to assure continued operability as required by Technical Specification 3.7.D.2.

Dresden Station requests approval of this proposed amendment request within 90 days after receipt. It is requested that this Technical Specification change be made effective 30 days after approval or prior to startup from the D2R13 refueling outage, whichever comes first. D2R13 is scheduled to begin on January 4, 1993.