



Commonwealth Edison
1400 Opus Place
Downers Grove, Illinois 60515

10 CFR 50.90

September 14, 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
Application to Amendment to Facility Operating
License DPR-19; Appendix A, Technical Specifications; Proposed
Amendment to Figure 3.6.1, "Minimum Reactor Vessel Metal
Temperature."
NRC Docket Nos. 50-237 and 50-249

Reference: P. Piet memo to T. Murley dated July 2, 1992

Dear Dr. Murley:

Pursuant to 10 CFR 50.90, Commonwealth Edison (CECo) proposes to amend Appendix A, Technical Specification, of Facility Operating License DPR-19. The purpose of this amendment request is to correct Figure 3.6.1, "Minimum Reactor Vessel Metal Temperature," and associated Bases. This amendment request addresses Dresden's commitment to submit an amendment to correct the Unit 2 Technical Specifications as discussed in the referenced memo. 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 approval.

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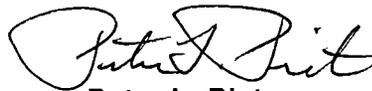
The proposed amendment has been reviewed and approved by CECo On-Site and Off-Site Review committees in accordance with company procedures.

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,



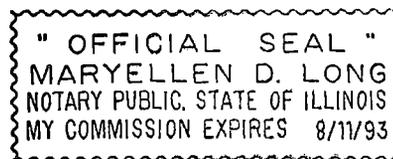
Peter L. Piet
Nuclear Licensing Administrator

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 14 day
of SEPTEMBER, 1992,
by Maryellen D Long
Notary Public DUPAGE COUNTY



ATTACHMENT A

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

BACKGROUND

Based upon a review of the reactor vessel beltline data performed in response to Generic Letter 92-01, CECo determined that the chemistry and initial RT_{NDT} for the Unit 2 electroslag welds were not actual values, but typical weld procedure qualification values, and may not be conservative. As a result, the Pressure-Temperature (P-T) curves for Dresden Unit 2 are non-conservative as provided in the current Technical Specifications (Figure 3.6.1). These curves were approved as a license amendment and issued in response to Generic Letter 88-11.

DISCUSSION

There were several heats of electroslag weld wire shown as being used in the Dresden and Quad Cities vessel longitudinal seams. Specific chemistry values for these heats were not available from General Electric Co. (GE) records, but data accompanying the weld procedure qualification tests for Dresden and Quad Cities were provided as typical data. Beltline adjusted reference temperatures (ARTs) developed in 1988 were later used to develop P-T curves in 1989 by GE. The typical weld procedure qualification values reported for Unit 2 were believed at the time to be actual weld material values. The RT_{NDT} and P-T curves for Unit 3 were developed using the bounding chemistry factors provided by the PQ-1300 weld.

The weld procedure qualification test results applied to the Dresden Unit 3 curves was PQ-1300. The resulting weld chemistry was 0.30% copper and 0.33% nickel. As shown below, the Regulatory Guide 1.99, Revision 2 chemistry factor (CF) for the PQ-1300 weld is higher than the CFs for both of the Dresden surveillance electroslag welds. Therefore, use of the PQ-1300 CF in the P-T curves is conservative for both Dresden plants.

Material	Copper	Nickel	Chemistry Factor
Dresden 2 surveillance	0.17	0.64#	158
Dresden 3 surveillance	0.21	0.35	126
PQ-1300 Data	0.30	0.33	160

This nickel value, based on only one test value, is unusually high for electroslag weld, and is expected to be conservative, as is the chemistry factor.

SUMMARY

Therefore, Table 3.6.1 and the associated Bases for Dresden Unit 2 is being modified to correctly reflect the appropriate conservatisms applied toward the development of the Dresden Unit 3 pressure-temperature (P-T) curves for the reactor vessel. Usage of this curve does not adversely impact plant operation nor does it adversely affect any assumptions used in the safety analysis for the plant. Dresden Station will administratively control the application of the Unit 3 P-T limits during all subsequent operation and pressure testing of Unit 2 pending final concurrence from the NRC Staff of this proposed amendment request. Dresden Station requests approval and issuance of this proposed amendment request within 90 days after receipt.