



Commonwealth Edison
1400 Opus Place
Downers Grove, Illinois 60515

January 27, 1995

U.S. Nuclear Regulatory Commission
Washington, D. C. 20555

Attn: Document Control Desk

Subject: Dresden Nuclear Power Station Units 2 and 3
Supplemental 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: (a) P. Piet letter to T. Murley, dated July 29, 1992.

In Reference (a), pursuant to 10 CFR 50.90, Commonwealth Edison (ComEd) proposed to amend Appendix A, Technical Specification to Facility Operating Licenses DPR-19, DPR-25, DPR-29 and DPR-30. The proposed amendment reflected ComEd's efforts to upgrade existing Technical Specifications Sections 1.0 "Definitions," Section 3.0/4.0 "Applicability," and Section 3.3/4.3 "Reactivity."

Dresden Station has recently rescheduled the Unit 2 refueling outage from March 4, 1995 until June 1995. As such, the surveillance frequency for certain Inservice Testing (IST) requirements expire on February 21, 1995. The requirements outlined in Reference (a) regarding IST, in accordance with BWR Standard Technical Specification (STS) guidance, allows the flexibility to perform these tests appropriately during refueling outages (where applicable) by providing a 25 percent extension to IST surveillance intervals. It is not intended that this provision be used repeatedly as a convenience to extend IST surveillance intervals beyond that specified for surveillances that are not performed during refueling outages. Likewise, it is not the intent that refueling outage surveillances be performed during power operation unless it is consistent with safe plant operation. The limitation of 25 percent is based on engineering judgement and the recognition that the most probable result of any particular surveillance being performed is the verification of conformance with the surveillance requirements. The proposed provision is sufficient to ensure that the reliability ensured through surveillance activities is not significantly degraded beyond that obtained from the specified surveillance interval.

To be consistent with the requirements outlined in the Improved Standard Technical Specifications (ITS; NUREG - 1433) and draft NUREG-1482, ComEd proposes to include the test frequency of two years to the IST Technical Specification surveillance table (3.0.D.2). Although this differs from the proposed surveillance table specified in Reference (a), the change is administrative in nature, encompasses all IST surveillance intervals, is consistent with the guidance provided in draft NUREG-1482 and is consistent with the requirements specified

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in the ITS (NUREG - 1433).

Dresden also proposes to update the ISI/IST references from Reference (a) (TSUP Section 4.0.E.1) to accurately reflect the appropriate sections of 10 CFR 50.55a. Proposed Technical Specification Section 3.0.D.1 (TSUP 4.0.E.1) correctly refers to ISI requirements per 10 CFR 50.55a(g) and IST requirements per 10 CFR 50.55a(f). Although modelled after the BWR STS, the Reference (a) submittal only referenced 10 CFR 50.55a(g). Although this supplemental change differs from the proposed submittal discussed in Reference (a), the change is administrative in nature and ensures consistency to the appropriate references in 10 CFR 50.55a encompassing ISI and IST requirements.

ComEd proposes to supplement the Reference (a) TSUP submittal for Dresden to be consistent with this proposed supplemental application. A copy of the affected revised TSUP pages for Dresden is included as an attachment to this letter.

In Reference (a), TSUP Specification 4.0.E.3 refers to TSUP Specification 4.0.B. TSUP Specification 4.0.B is consistent with current Technical Specification 1.0.CC.a, which includes the provisions that allow a maximum allowable 25 percent extension of the surveillance interval. Therefore, to be consistent with the current Technical Specification requirements, ComEd proposes to refer to current Technical Specification 1.0.CC.a in proposed specification 3.0.D.3. The change is administrative in nature and consistent with the requirements specified in the Improved Standard Technical Specifications (ITS; NUREG - 1433).

In order to expedite the application of this issue, ComEd requests that proposed Section 4.0.E from Reference (a) be approved outside of the TSUP program and applied to the current Technical Specifications for Dresden Station as Section 3.0.D. By extracting Section 4.0.E from Reference (a), the original finding of No Significant Hazards Consideration is unaffected by this supplemental application. The supplemental requirements are equivalent to those specified in Reference (a).

This supplemental request is purely schedular in nature and as such, does not change the findings that the proposed supplemental application does not involve a significant increase in the probability or consequences of an accident previously evaluated; or create the possibility of a new or different kind of accident from any accident previously evaluated; or involve a significant reduction in a margin of safety. The NRC staff's original findings and basis for a significant hazards determination was published in the Federal Register, Volume 58, Number 119, on June 23, 1993 (pages 34071 - 34073) and remains unaffected by ComEd's proposed supplemental request.

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ComEd requests that this amendment be approved by the NRC staff prior to February, 21, 1995 in order to avoid an unnecessary shutdown of Unit 2 (including the associated thermal cycling and safety system challenges).

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

ComEd is notifying the State of Illinois of this supplemental application for amendment by transmitting a copy of this letter and its attachments to the designated State Official.

If there are any questions concerning this matter, please contact this office.

Respectfully,



Peter L. Piet

Nuclear Licensing Administrator

Attachments

cc: J. B. Martin, Regional Administrator - RIII
J. F. Stang, Project Manager - NRR
M. N. Leach, Senior Resident Inspector - Dresden
Office of Nuclear Facility Safety - IDNS

Signed before me on this 27th day
of January, 1995,
by Mary Jo Yack
Notary Public

