Commonwealth Edison Company
1400 Opus Place
Downers Grove, IL 60515

September 1, 1995

ComEd

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

Attn: Document Control Desk

Subject: Dresden Nuclear Power Station Units 2 and 3
Application for Amendment to Facility Operating Licenses DPR-19 and DPR-25, Appendix A, Technical Specifications for Technical Specification Upgrade Program
NRC Docket Nos. 50-237 and 50-249

Reference: J. Schrage memo to T. Murley, dated October 2, 1991.

In 1991, Commonwealth Edison (ComEd) initiated a formal program to enhance Quad Cities Station's performance in various aspects of plant operation. Necessary improvements to the Technical Specifications were identified as one of the Station top priority issues. In support of that effort, Quad Cities submitted revised Technical Specifications to the NRC during the course of the year (the referenced letter included Quad Cities' submittal for Section 6.0). To enhance the Quad Cities effort and to improve the Technical Specifications at Dresden Station, ComEd initiated a combined, two-station, Technical Specification Upgrade Program (TSUP) to revise the Dresden Technical Specifications and improve the Quad Cities submittals. This program has been outlined and discussed with members of the NRR staff.

Pursuant to 10 CFR 50.90, ComEd proposes to amend Appendix A, Technical Specification to Facility Operating Licenses DPR-19 and DPR-25. The proposed amendment reflects Commonwealth Edison's efforts to upgrade existing Dresden Station Units 2 and 3 Technical Specification Section 6.0 "Administrative Controls." An overall description of the proposed amendment is also included in the Executive Summary. ComEd will submit a similar proposed amendment for Quad Cities Station Units 1 and 2 under separate cover.

The proposed amendment request is provided as follows:

1. An Executive Summary of the Technical Specification Upgrade Program and the proposed amendment;

2. A description of the proposed amendment;

3. The proposed Technical Specification pages with the requested changes;

4. The existing Technical Specification pages for DPR-19 and DPR-25 (Dresden). To reduce the administrative requirements to process this amendment package, a list of the deleted pages for Dresden Units 2 and 3 are provided; the current versions of existing pages will be provided separately for your staff's information and for comparative purposes;

A001

5. The technical differences between the existing Dresden Unit 2 and Unit 3 Technical Specifications; and

6. Commonwealth Edison's evaluation pursuant to 10 CFR 50.92(c) and 10 CFR 51.21;

The proposed amendments have been approved by Commonwealth Edison's On-Site and Off-Site Review in accordance with Company procedures.

The Technical Specification Upgrade Program (TSUP) proposes changes to each section of the existing Technical Specifications. As such, Commonwealth Edison requests that the proposed amendments be approved as submitted but to become effective upon completion of the entire project. It is requested that the proposed changes to Section 6.0 be approved prior to October 13, 1995.

To the best of my knowledge and belief, the statements contained are true and correct. In some respects, these statements are not based on my personal knowledge but obtained information furnished by other Commonwealth Edison 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 attachments to the designated State Official.

If there are any comments or questions concerning this submittal, please direct them to this office.

Sincerely,

OFFICIAL SEAL
MARY JO YACK
NOTARY PUBLIC STATE OF ILLINOIS
MY COMMISSION EXPIRES: 11/29/97

John L. Schrage
Nuclear Licensing Administrator

Mary Jo Yack 9-7-95

Attachments:
1. Executive Summary
2. Description of the Proposed Amendment
3. The proposed Technical Specification Pages
4. Listing of Deleted Technical Specification Pages
5. Technical Difference Matrix
6. Significant Hazards Evaluation and Environmental Assessment

cc: H.B. Miller, Regional Administrator - RIII
J.F. Stang, Project Manager - Dresden
R.M. Pulsifer, Project Manager - Quad Cities
M.N. Leach, Senior Resident Inspector - Dresden
C.G. Miller, Senior Resident Inspector - Quad Cities
Office of Nuclear Facility Safety - IDNS

ATTACHMENT 1

EXECUTIVE SUMMARY

Technical Specification 6.0

"ADMINISTRATIVE CONTROLS"

EXECUTIVE SUMMARY

The Dresden Technical Specification Upgrade Program (TSUP) was conceptualized in response to lessons learned from the Diagnostic Evaluation Team inspection and the frequent need for Technical Specification interpretations. A comparison study of the Standard Technical Specification (STS), later operating plant's Technical Specifications provisions and Quad Cities Technical Specifications was performed prior to the Dresden and Quad Cities TSUP effort. The study identified potential improvements in clarifying requirements and requirements which are no longer consistent with current industry practices.

The TSUP is not intended to be a complete adoption for the STS. Overall, the Dresden custom Technical Specifications provide for the safe operation of the plant and therefore, only an upgrade is deemed necessary.

In response to an NRC recommendation, Quad Cities combined the Unit 1 and Unit 2 Technical Specifications into one document. The Dresden Unit 2 and Unit 3 Technical Specifications will also be combined into one document. To accomplish the combination of the Units' Technical Specification, a comparison of the Unit 2 and Unit 3 Technical Specification was performed to identify any technical differences. The technical differences are identified in the proposed amendment package for each section.

The TSUP goal is to provide a better tool to station personnel to implement their responsibilities and to ensure that Dresden Station is operated in accordance with current industry practices. The improved Technical Specifications provide for enhanced operation of the plant.

The proposed Dresden TSUP Section 6.0 requirements are consistent with those proposed in ComEd's April 24, 1995 submittal. The proposed changes are as follows: 1) deletion of the "Review, Investigative and Audit Functions"; 2) title changes to reflect the reorganization of ComEd's Nuclear Operations Division; 3) miscellaneous administrative and editorial changes.

The proposed specification is adopted from the Byron and Braidwood Technical Specifications. Commonwealth Edison prefers to maintain Section 6.0 consistent among all of the six nuclear stations. The proposed specifications utilized the Byron/Braidwood specifications because they more closely followed the Standard Technical Specifications.

Specification 6.0 has been reordered and new titles have been added based on STS arrangements and nomenclature. Some sections have moved to be consistent with the Byron and Braidwood Technical Specifications.

Current Specifications 6.7, Environmental Qualification and 6.10, Major Change to Radioactive Waste Treatment Systems are deleted in accordance with Standard Technical Specifications. Section 6.7 has been superseded by 10CFR 50.49 and Section 6.10 was deleted through the implementation of Generic Letter 89-01.

ATTACHMENT 2

DESCRIPTION OF CHANGES

Technical Specification 6.0

"ADMINISTRATIVE CONTROLS"

ATTACHMENT 2

DESCRIPTION OF AMENDMENT REQUEST

The changes proposed in this amendment request are made to 1) improve the understanding and usability of the present technical specifications, 2) incorporate technical improvements, and 3) include some provisions from later operating plants.

GENERIC CHANGES

The format of the proposed TSUP specification is adopted from the Byron and Braidwood Technical Specifications. The proposed format changes are to make TS Section 6.0 consistent among all of ComEd's six nuclear stations. The proposed specifications utilized the Byron/Braidwood specifications because they more closely followed the Standard Technical Specifications. Therefore, the proposed specifications are identical to the approved Byron and Braidwood Technical Specifications except where limited by design or station procedural practices or regulatory requirements.

COMPARISON OF CURRENT TECHNICAL SPECIFICATIONS (CTS) TO TSUP AND BASIS OF THE PROPOSED CHANGES

CTS 6.1 Organization, Review, Investigation and Audit

1. CTS 6.1.A.1 is encompassed within TSUP 6.2.A.1. The proposed deletion of the requirement "... or the Management Plan for Nuclear Operations, Section 3 Organizational Authority, Activity; Section 6 Interdepartmental Relationships." is consistent with ComEd's submittal dated April 24, 1995. The Management Plan is no longer maintained, therefore, this reference has been deleted. The Organizational lines of authority and responsibilities will continue to be documented in the QA Topical Report . Maintaining these requirements in the QA Topical Report will ensure that proposed changes to these requirements will receive appropriate regulatory oversight. NRC review of the Quality Assurance Program is governed by 10 CFR 50.54.

2. CTS 6.1.A.2 is encompassed within TSUP 6.2.A.2. The proposed requirements are equivalent to CTS requirements.

3. CTS 6.1.A.3 is encompassed within TSUP 6.2.A.3. The title "Senior Vice President - Nuclear Operations" has been changed to "Chief Nuclear Officer (CNO)" to be consistent with the current corporate management structure at ComEd. The proposed change is consistent with ComEd's submittal dated April 24, 1995.

4. CTS 6.1.A.4 is encompassed within TSUP 6.2.A.5. The proposed requirements are equivalent to CTS requirements.

5. CTS 6.1.B is encompassed within TSUP 6.2.B.5. Minor administrative changes to the titles of key personnel are proposed to be consistent with current plant terminology. "Licensed Senior Operators" has been modified to "senior reactor operators." "Licensed operators" has been modified to "reactor operators." "Health physics personnel" has been modified to "health physicists." "Equipment operators" has been modified to "auxiliary operators." Regarding overtime restrictions, clarification has been added to allow deviations from the guidelines of

Generic Letter 82-12 as long as they are authorized in advance by the Station Manager or his designee, in accordance with approved administrative procedures, or by higher levels of management, in accordance with established procedures and with documentation of the basis for granting the deviation.

6. CTS 6.1.C is encompassed within TSUP 6.2.B. The requirements of CTS Table 6.1.1 specific to the minimum licensed operator staffing levels during CORE ALTERATIONS are not included into TSUP because they are encompassed within 10 CFR 50.54(m)(2)(iv). Per Operating Licenses DPR-19 and DPR-25, Dresden must satisfy the requirements of 10 CFR 50.54(m)(2)(iv). 10 CFR 50.54(m)(2)(iv) specifies that "Each licensee shall have present, during alteration of the core of a nuclear power unit (including fuel loading or transfer), a person holding a senior operator license or a senior operator license limited to fuel handling to directly supervise the activity and, during this time, the licensee shall not assign other duties to this person." As such, Technical Specification requirements for the minimum licensed operator staffing levels during CORE ALTERATIONS are redundant. Therefore, the proposed change administratively relocates the description of these controls and does not relax the plant's obligations to maintain the appropriate licensed operator staffing levels during CORE ALTERATIONS. The proposed change is consistent with ComEd's submittal dated April 24, 1995.

   The requirements of CTS Table 6.1.1 are encompassed within TSUP 6.2.B. 10 CFR 50.54(m)(2)(i) specifies the number of Operators and Senior Operators required per shift and is dependent upon the operating mode of the Units. Per Operating Licenses DPR-19 and DPR-25, Dresden must satisfy the requirements of 10 CFR 50.54(m)(2)(i). For Dresden, with no units operating, one licensed senior reactor operator and two licensed reactor operators are required to be on-shift. With one or both units operating, two licensed senior reactor operators and three licensed reactor operators are required to be on-shift. TSUP 6.2.C provides additional requirements and role clarification for the STA. The proposed change is consistent with the shift manning requirements as discussed in the Improved Standard Technical Specifications (ITS - NUREG-1433, Revision 1). The reference to 10 CFR 50.54(m)(2)(i) within proposed TSUP 6.2.B.3 ensures that the appropriate shift-manning requirements are maintained. Therefore, the proposed changes administratively relocate the description of these controls and does not relax the plant's obligations to maintain the appropriate licensed operator staffing levels on-shift.

7. CTS 6.1.D is encompassed within TSUP 6.3. At Dresden, the "Health Physics Supervisor" title has been changed to the "Radiation Protection Manager." In addition, the position of "Technical Superintendent" no longer exists. The requirement that the individual filling the position of "Site Engineering Manager" meets the requirements for "Technical Manager" as described in Section 4.2.4 of ANSI N18.1 (1971) is redundant to existing requirements for unit staff and has been deleted. The remainder of the proposed change is consistent with ComEd's submittal dated April 24, 1995.

   The specific details regarding the training of Radiation Protection Technicians has not been retained within TSUP 6.3. The requirements specified in ANSI N18.1 should suffice for defining the training requirements for site personnel. The specific procedural details for delineating the training program for personnel is inappropriate for inclusion within the Technical Specifications as this information is more appropriately contained within station procedures, controlled by 10 CFR 50.59.

8. CTS 6.1. E has not been retained within TSUP 6.4. The proposed TSUP changes relocate the requirements for the fire brigade training and other fire protection administrative controls to the Fire Protection Program as described in the plant's UFSAR. Current license condition 3.G for Dresden Unit 3 and license condition 2.E for Dresden Unit 2 provide adequate control of these requirements. This control ensures that any changes made to the site's fire protection program that adversely affect the ability of the plant to achieve and maintain safe shutdown in the event of a fire require NRC staff review and approval. As such, the current license conditions provide an equivalent level of oversight as the current Section 6.0, Administrative Controls and are therefore, redundant. Because, the relocation of these requirements to the UFSAR does not reduce the controls of existing requirements; as such, the proposed change is administrative in nature and does not reduce existing plant fire protection requirements.

9. CTS 6.1.F has not been retained within TSUP 6.4. The proposed training and re-training requirements for site personnel (licensed and unlicensed) are adequately controlled via the provisions of ANSI N18.1 or by the licensing requirements of the individual's licenses. As such, the requirements specified in CTS 6.1.F are redundant and unnecessary for inclusion in the TS.

10. CTS 6.1.G has not been retained within TSUP 6.0. The requirements contained in this section will be relocated to the ComEd Quality Assurance Program Topical Report CE-1-A. The proposed change is consistent with ComEd's submittal dated April 24, 1995.

11. CTS Table 6.1.1 for Dresden is encompassed within TSUP 6.2.B. The CTS requirements for Dresden Table 6.1.1 regarding three Units has not been retained within TSUP 6.2.B. CTS Table 6.1.1 for Dresden is based on Dresden Unit 1 control room manning requirements at a period of time when Dresden Units 1, 2 and 3 shared a common control room. The Unit 2 and Unit 3 control room has since been modified and excludes Unit 1 requirements. As such, the number of required non-licensed operators has been reduced in proposed TSUP 6.2.B.1 to be consistent with industry standards and practices regarding shift manning requirements. The Unit 1 requirements are specified in the Unit 1 Technical Specifications. In addition, the shift manning requirements for both Units defueled is encompassed by the requirements with Units in Mode 4 or 5, as described above.

    Current Technical Specification provisions at Dresden Station in Table 6.1.1 specify that one (1) RAD MEN (Radiation Protection Men) will be in position under all conditions of units with fuel. Current provisions to Dresden Table 6.1.1 [Note (1)] allow staffing levels to be less than the minimum staffing level for a two (2) hour period, if immediate actions are taken to restore the requirements.

    The proposed requirements eliminate the ambiguities associated with the applicable conditions for manning of the Radiation Protection Technician. Current Technical Specification requirements are unclear regarding applicability and corresponding location of fuel within the nuclear units. Current Dresden provisions specify in Table 6.1.1, "UNITS WITH FUEL." It is unclear if the current reference to fuel regarding the unit is applicable when fuel is in the reactor vessel or when fuel is in the reactor vessel and/or spent fuel storage locations. The proposed requirements explicitly clarify that the manning requirements are applicable for the Radiation Protection Technician when fuel is in the reactor, thus eliminating the current ambiguity.

The proposed requirements specified in TSUP 6.2.B.3 are consistent with those specified in the Improved Standard Technical Specifications (ITS - NUREG-1433). In addition, the proposed requirements are consistent with the provisions specified in the LaSalle County, Braidwood, Byron, River Bend, Perry and Hope Creek Technical Specifications.

The proposed requirements enhance guidance given to shift personnel regarding minimum staffing levels and eliminate ambiguities associated with the current Technical Specification requirements; therefore, the proposed changes provide an adequate level of protection for Radiation Protection Technician shift manning when compared to current requirements.

The Shift Manager (SM) position fulfills the requirements in the Dresden CTS for the number of SROs on shift. As such, the proposed TSUP requirements are equivalent to CTS shift manning requirements for SROs.

12. CTS 6.1.H regarding the Fire Protection Program has not been retained within TSUP 6.0. The requirements contained in this section will be relocated to the ComEd Quality Assurance Program Topical Report CE-1-A. This change is consistent with ComEd's submittal dated April 24, 1995.

CTS 6.2 Procedures and Programs

1. CTS 6.2.A, regarding the controls for written procedures is encompassed within TSUP 6.8.A. The proposed requirements are equivalent to CTS requirements.

2. CTS 6.2.B regarding technical review and control of procedures and CTS 6.2.C regarding temporary changes to procedures and has been deleted from TSUP and relocated to administrative controls. Relocation is based on existing regulations and standards that contain these provisions, such that duplication in TSUP is not necessary. The requirements for the establishment, maintenance and implementation of procedures related to activities affecting quality are contained in 10 CFR 50, Appendix B, Criteria II and V; ANSI N18.7-1976; and ANSI N45.2-1971. Changes to the implementing procedures will be controlled by the requirements of 10 CFR 50.59 to ensure that proper reviews affecting safe operation of the plant are performed.

3. CTS 6.2.D has not been retained within TSUP 6.0. The GSEP Manual requirements are encompassed within CTS 6.2.A.4 that specifies that written procedures shall be established, implemented and maintained covering the activities associated with the implementation of the Generating Station Emergency Response Plan. CTS 6.2.A.4 is retained as TSUP 6.8.A.4. In addition, the proposed changes are consistent to the requirements specified in the Byron/Braidwood Technical Specifications.

CTS 6.3 Reportable Event Action

1. CTS 6.3 has not been retained in TSUP 6.0. Requirements regarding promptly reviewing and reporting of reportable events has not been retained in TSUP 6.0 The organization and responsibilities of individuals and functions are adequately described in plant procedures and the Quality Assurance Program. Eliminating repetition of these details from the Technical Specifications will not compromise plant safety. The removal of these items are consistent with

changes addressed in NRC letter from W. T. Russell to Owners Group Chairmen, dated October 25, 1993. In addition, the proposed changes are consistent with the guidance provided in the BWR Improved Standard Technical Specifications, NUREG-1433.

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

1. CTS 6.4 regarding administrative actions required in the event a safety limit is exceeded are encompassed within TSUP 6.7. CTS 6.4 nomenclature related to the Vice President BWR Operations promptly reporting the event has been replaced with Site Vice President to reflect the current ComEd organizational structure.

   CTS 6.4 regarding the incident report development has been encompassed within TSUP 6.7.A.2. TSUP provides clarification of the reporting vehicle for the event in that it requires an LER be prepared and submitted to the Commission to document the incident. The TSUP elimination of the review reference to Dresden CTS 6.1.G.1.a and 6.1.G.2.b(10) are consistent to those proposed by ComEd in the April 24, 1995 submittal.

   Regarding Safety Limit Actions, the current requirements specifying the immediate shutdown of the reactor has been deleted from Section 6.0 and relocated to TSUP Section 2.0. Previous TSUP submittals for section 2.0 allow a period of 2 hours to bring the unit to a shutdown conditon and then subsequently initiate the appropriate reporting requirements. The proposed TSUP requirements allow a period of time to assess, evaluate and choose the safest course of action. The current requirements may in fact be imprudent because no time to pause and assess the situation is provided. Thus, during an event or transient that threatens a plant safety limit, immediate shutdown of the reactor may introduce additional uncertainty into the event. The proposed changes have been shown by industry experience and precedence to provide reasonable assurance that the reactor coolant system pressure boundary integrity can be maintained within the requirements of the Standard Technical Specification and the Improved Standard Technical Specifications. The small time frame (2 hours) is insignificant with respect to overall plant vulnerability, and prudently allows a reasonable time period to assess a situation in which a safety limit may be approached and thus, the proposed changes are appropriate.

CTS 6.5 Plant Operating Records

1. Requirements contained in CTS 6.5 have not been retained in TSUP. The requirements related to Record Retention can be adequately controlled in the UFSAR and plant procedures, revisions to which are controlled by 10 CFR 50.59. The removal of these items are consistent with changes addressed in NRC letter from W. T. Russell to Owners Group Chairmen, dated October 25, 1993. In addition, the proposed changes are consistent with the guidance provided in the BWR Improved Standard Technical Specifications, NUREG- 1433.

CTS 6.6 Reporting Requirements

1. CTS 6.6.A.1 has been deleted from TSUP. These requirements can be adequately controlled in the UFSAR and plant procedures by 10 CFR 50.59. Eliminating repetition of these details from the Technical Specifications will not compromise plant safety. The removal of these items are consistent with changes addressed in NRC letter from W. T. Russell to Owners Group Chairmen, dated October 25, 1993. In addition, the proposed changes are consistent with the

guidance provided in the BWR Improved Standard Technical Specifications, NUREG-1433.

2. CTS 6.6.A.2 is encompassed within TSUP 6.9.A.2.a. The proposed TSUP requirements are equivalent to CTS requirements.

3. CTS 6.6.A.3 is encompassed within TSUP 6.9.A.5 and the ODCM. The proposed TSUP requirements are equivalent to CTS requirements.

4. CTS 6.6.A.4.a is encompassed within TSUP 6.9.A.6.a. The proposed TSUP requirements are equivalent to CTS requirements.

5. CTS 6.6.A.4.b is encompassed within TSUP 6.9.A.6.b. The proposed TSUP requirements are equivalent to CTS requirements.

6. CTS 6.6.A.4.c is encompassed within TSUP 6.9.A.6.c. The proposed TSUP requirements are equivalent to CTS requirements.

7. CTS 6.6.A.4.d is encompassed within TSUP 6.9.A.6.c. The proposed TSUP requirements are equivalent to CTS requirements.

8. CTS 6.6.B [Reportable Events] has not been retained in TSUP 6.0. The reporting of reportable events requirement is simply a repeat of that required by 10 CFR 50.73, therefore the regulation need not be repeated within the Technical Specifications. Since there is no change in requirements, and the requirements cannot be changed without prior NRC approval, this is considered an administrative change.

9. CTS 6.6.C.1 is encompassed within TSUP 6.9.A.4. The CTS requirements for a Semi-Annual report have been modified to an Annual report. This change is consistent with the final rule for reducing the regulatory burden on nuclear licensees that was published in the Federal Register (FR) on August 31, 1992. The rule change included a revision to 10 CFR 50.36a regarding the frequency for submitting radiological effluent reports. This change is administrative in nature and makes the Technical Specifications consistent with the requirements of 10 CFR 50.36a. The change does not adversely impact the ability to meet applicable regulatory requirements related to liquid and gaseous effluents. The proposed change will eliminate an unnecessary administrative burden without reducing the protection of the public health and safety. Proposed TSUP 6.9.A.4 is consistent with a similar amendment previously approved for Byron and Braidwood Stations
(G. Dick letter to D. Farrar, dated February 2, 1995).

10. CTS 6.6.C.2.a(2) is encompassed within TSUP 6.9.A.3 and the ODCM. The proposed TSUP requirements are equivalent to CTS requirements.

11. CTS 6.6.C.2.a(1) is encompassed within TSUP 6.9.A.2.b. The proposed TSUP requirements are consistent with the requirements in the Byron/Braidwood TS. The proposed reporting requirements for Specific Activity in the reactor coolant ensures the appropriate information, consistent to industry practices, is submitted to the Commission.

12. CTS 6.6.C.3 is encompassed within TSUP 6.9.B. The proposed TSUP requirements are equivalent to CTS requirements.

13. CTS Table 6.6.1 has not been retained in TSUP 6.0. One-time reports, which were required five years within unit commercial service date, and upon completion of initial testing, have been deleted from TSUP. The individual requirements for periodic special reports are described within each individual TSUP specification. Requirements pertaining to Radioactive Source Leak Testing reporting have been relocated to TSUP Section 3.8.G, ACTION 2. Requirements pertaining to an NRC report 90 days after completing a Secondary Containment Leak Rate Test has been deleted from TSUP and relocated to administrative controls. The proposed TSUP requirements are consistent with the requirements in the Byron/Braidwood TS.

CTS 6.7 Environmental Qualification

CTS 6.7.A and CTS 6.7.B regarding the Environmental Qualification requirements has not been retained with TSUP 6.0. CTS 6.7, Environmental Qualification (EQ), is being deleted in accordance with 10CFR 50.49, Environmental Qualification of Electrical Equipment Important to Safety for Nuclear Power Plants. 10 CFR 50.49 supersedes the current requirements in the Technical Specifications.

CTS 6.8 Offsite Dose Calculation Manual (ODCM)

1. CTS 6.8.A regarding the definition of the ODCM is encompassed within TSUP 1.0, "Definitions," for the ODCM. The TSUP definition for ODCM has been previously approved by the NRC staff (J. Stang letter to D. Farrar, dated February 16, 1995).

   CTS 6.8.A regarding the submittal of the ODCM at the time of RETS to the Commission is superseded by proposed TSUP 6.14.A.3. The CTS 6.8.A requirements are obsolete and are based upon Dresden and Quad Cities' TS submittals in the early 1980's related to the incorporation of the original Radiological Effluents Technical Specifications (R. Bevan letter to D. Farrar [for Quad Cities], dated June 19, 1984). The proposed TSUP 6.14.A.3 requirements are consistent to the guidance provided in Generic Letter 89-01 and are consistent to the Byron/Braidwood Technical Specification requirements.

2. CTS 6.8.B is encompassed within TSUP 6.14.A.1 and TSUP 6.14.A.2. The proposed TSUP 6.14.A.1 and 6.14.A.2 requirements are consistent to the guidance provided in Generic Letter 89-01 and are consistent with the Byron/Braidwood Technical Specification requirements.

CTS 6.9 Process Control Program (PCP)

1. CTS 6.9.A regarding the definition of the PCP is encompassed within TSUP 1.0, "Definitions," for the ODCM. The TSUP definition for PCP has been previously approved by the NRC staff (J. Stang letter to D. Farrar, dated February 16, 1995).

2. The CTS 6.9.B requirements are obsolete and are based upon Dresden and Quad Cities' TS submittals in the early 1980's related to the incorporation of the original Radiological Effluents Technical Specifications (R. Bevan letter to D. Farrar [for Quad Cities], dated June 19, 1984).

The proposed TSUP 6.13.A requirements are consistent with the guidance provided in Generic Letter 89-01 and are consistent to the Byron/Braidwood Technical Specification requirements.

3. CTS 6.9.C is encompassed within TSUP 6.13.A.1 and 6.13.A.2. The proposed TSUP 6.14.A.1 and 6.13.A.2 requirements are consistent to the guidance provided in Generic Letter 89-01 and are consistent to the Byron/Braidwood Technical Specification requirements.

CTS 6.10 Major Changes to Radwaste Treatment Systems

Current Specification 6.10, Major Changes to Radioactive Waste Treatment Systems is being deleted in accordance with Generic Letter 89-01, "Implementation of Programmatic Controls for Radiological Effluent Technical Specifications in the Administrative Controls Section of the Technical Specifications and Relocation of procedural details of RETS to the Offsite Dose Calculation Manual or to the Process Control Program." The programmatic requirements contained within the current specification are relocated to the Offsite Dose Calculation Manual in accordance with the Generic Letter.

CTS 6.11 Radiation Protection Program

CTS 6.11.1 is encompassed within TSUP 6.11. The proposed TSUP requirements are equivalent to CTS requirements.

CTS 6.12 High Radiation Area

1. CTS 6.12.1 is encompassed within TSUP 6.12.A. TSUP incorporates the definition of HIGH RADIATION AREA as revised in 10 CFR Part 20. TSUP Section 6.12.A describes administrative controls for HIGH RADIATION AREA(s) when dose rates are above 100 mrem/hr at 30 cm (12 in.). The proposed TSUP requirements are equivalent to CTS requirements.

2. CTS 6.12.2 is encompassed within TSUP 6.12.B. TSUP removes the requirement to establish a stay time for personnel entering HIGH RADIATION AREA(s) with dose rates above 1000 mrem/hr at 30 cm (12 in.). TSUP conservatively includes requirements such that persons entering a HIGH RADIATION AREA with dose rates above 1000 mrem/hr at 30 cm (12 in.) to have an alarming radiation monitoring device or to have surveillance and radiation monitoring by a qualified Radiation Protection Technician. This ensures that exposure control is maintained.

   In emergency situations which involve personnel injury or actions taken to prevent major equipment damage, surveillance and radiation monitoring of the work area by a qualified individual may be substituted for routine RWP procedures.

   The proposed TSUP requirements meet the intent of the original CTS requirements.

Miscellaneous New Requirements

1. Specification 6.1, "Responsibility," is a new specification that provides clarification and enhanced guidance regarding the roles and responsibilities of site leadership. The proposed requirements

are consistent with the TS requirements located within the Byron/Braidwood TS.

2. Specification 6.8.B.1 is a new specification for the program Reactor Coolant Sources Outside Primary Containment. The proposed program ensures that leakage from those portions of systems outside primary containment that contain highly radioactive liquid, remain as low as possible. The proposed specification replaces the current license condition for Systems Integrity for DPR-25 (Dresden Unit 3). There is no such license condition in DPR-19 (Dresden Unit 2). The marked-up revised license pages are included in Attachment 4.

3. Specification 6.8.B.2 is a new specification for the program In-Plant Radiation Monitoring. The proposed program ensures the capability to accurately determine the airborne iodine concentrations. The proposed specification replaces the current license condition for Iodine Monitoring for DPR-25 (Dresden Unit 3). There is no such license condition in DPR-19 (Dresden Unit 2). The marked-up revised license page is included in Attachment 4.

4. Specification 6.8.B.3 is a new specification for the program Post Accident Sampling. The proposed program ensures the capability to obtain and analyze reactor coolant, gaseous effluents, and containment atmosphere samples under accident conditions.

5. Specification 6.8.B.4 is a new specification for the Radioactive Effluent Controls Program. The programs ensures that the doses to the members of the public from radioactive effluents will remain as low as reasonably achievable.

SUMMARY AND SCHEDULE

The proposed changes to the Dresden Station Technical Specifications have been reviewed and approved by the Onsite Review in accordance with controlled Station Procedures. Commonwealth Edison has reviewed these proposed amendments in accordance with 10CFR 50.92(c) and determined that no significant hazards consideration exist. This evaluation is documented in Attachment 6. It is requested that the proposed amendment be approved no later than October 13, 1995 and made effective upon completion of the entire Technical Specification Upgrade Program.

ATTACHMENT 3

PROPOSED TECHNICAL SPECIFICATIONS

Technical Specification 6.0

"ADMINISTRATIVE CONTROLS"

ATTACHMENT 4

EXISTING TECHNICAL SPECIFICATIONS

Technical Specification 6.0

"ADMINISTRATIVE CONTROLS"