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ComEd

March 26, 1996

JSPLTR: 96-0045

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D.C. 20555

Subject: Dresden Nuclear Power Station Units 2 and 3
Quad Cities Nuclear Power Station Units 1 and 2
Supplement to Application for Amendment to Facility Operating Licenses DPR-19, DPR-25, DPR-29 and DPR-30, Appendix A, Technical Specifications for the Technical Specifications Upgrade Program (TSUP)
NRC Docket Nos. 50-237/249 and 50-254/265

References: (a) P. Piet letter to U.S. NRC, dated November 14, 1995 (ComEd submittal regarding TSUP clean-up).

(b) J. Schrage letter to U.S. NRC, dated September 20, 1995 (ComEd submittal for TSUP 6.0 for Quad Cities).

(c) J. Schrage letter to U.S. NRC, dated September 1, 1995 (ComEd submittal for TSUP 6.0 for Dresden).

(d) J. S. Perry letter to U. S. NRC, dated March 1, 1996 (ComEd submittal to resolve miscellaneous issues from the TSUP project).

(e) J. S. Perry letter to U. S. NRC, dated March 13, 1996.

This letter supersedes the Reference (d) letter. The purpose of the Reference (d) letter was to close out TSUP open items as identified by the NRC staff's review of the Reference (a), Reference (b) and Reference (c) submittals regarding the TSUP project. A revised summary and ComEd's assessment of the proposed changes are provided as Attachment A to this letter. Marked-up pages of previously revised versions of Reference (a) (noted by the absence of Amendment Numbers) or newly revised versions following previous NRC staff approval (noted by inclusion of Amendment Numbers), are provided in Attachment B. Attachment C includes revised versions of the TSUP pages.

To ensure continuity and to simplify the review of this submittal, in some cases, Attachment C includes copies of previously approved portions of TSUP. Due to removal or addition of some information, page numbering may have been affected. As such, the additional pages provided ensures a complete package is available with the NRC staff for review. It should be noted that the pages provided in Attachment C for Dresden Station supersede those provided in Reference (e).

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

Sincerely,

J. M. Heffley
Station Manager
Dresden Station

Attachment: A. Summary and Assessment of TSUP Clean-Up Changes
B. Marked-Up TSUP Pages
C. Revised TSUP Pages

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

Signed before me on this 26th
day of March, 1996,
by Janice M. Tondini
Notary Public

"OFFICIAL SEAL"
JANICE M. TONDINI
NOTARY PUBLIC, STATE OF ILLINOIS
MY COMMISSION EXPIRES 2/21/97

ATTACHMENT A

Summary and Assessment of TSUP Clean-Up Changes
Dresden and Quad Cities Nuclear Power Stations

AFFECTED PAGES[a]	SITE	SUMMARY & ASSESSMENT
I	Q	ComEd proposes to modify the Table of Contents (TOC) (page I) to add MAXIMUM FRACTION OF LIMITING POWER DENSITY (MFLPD). This Definition was inadvertently omitted from the Table of Contents. In addition, ComEd proposes to delete the Definition of FUEL DESIGN LIMITING RATIO (FDLRX) and FUEL DESIGN LIMITING RATIO for CENTERLINE MELT (FDLRC) from the Table of Contents. These Definitions are not applicable to Quad Cities.
VIII	D/Q	ComEd proposes to modify the Table of Contents (page VIII) to delete reference to Table 4.6.J-1. See discussion for pages 3/4.6-16, 17, and 18 below for further information.
XII	D/Q	ComEd proposes to modify the Table of Contents (page XII) to delete reference to 3/4.10.D Decay Time. See discussion for pages 3/4.10-6 and B 3/4.10-2 below for further information.
XXV	D/Q	ComEd proposes to modify the Table of Contents (page XXV) to delete reference to the Bases for 3/4.10.D Decay Time. See discussion for pages 3/4.10-6 and B 3/4.10-2 below for further information.
1-4	D/Q	ComEd proposes to modify the title within the Section 1.0 Definition for the ODCM for the Radioactive Effluent Release Report from Semi-Annual to Annual to be consistent with the proposed changes to proposed TS 6.9. The proposed change is administrative in nature and consistent with the revised requirements of Part 20.
3/4.1-7	D/Q	ComEd proposes to add footnote (o) to the CHANNEL FUNCTIONAL TEST and CHANNEL CALIBRATION frequency for Item 2.a of Table 4.1.A-1, APRM Setdown Neutron Flux - High in MODE 3. This footnote allows 24 hours to perform the surveillances after entry into MODE(s) 2 or 3 from MODE 1. This is to allow the unit to be quickly taken to shutdown if required without pausing for performance of surveillances on these instruments. The footnote was previously added to the MODE 2 surveillances, and was inadvertently not included for the MODE 3 surveillances. This is an administrative change, as the footnote clearly states the intention to apply to MODE 3 as well as MODE 2.

[a] Marked-up pages in Attachment B.

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3/4.1-7, 3/4.1-9	D/Q	ComEd proposes to delete reference to footnote (g) in Table 4.1.A-1, Item 2.b, daily CHANNEL CHECK for the Flow Biased Neutron Flux-High trip of the APRM and to delete footnote (g) from the list of notes for Table 4.1.A-1. This footnote, which requires verification that the measured recirculation loop flow is greater than or equal to established recirculation loop flow at the existing pump speed, is deleted in NUREG-1433 as redundant to existing recirculation flow surveillances (TSUP 3/4.6.B). The proposed change is consistent with the plant design.
3/4.1-7 3/4.1-10 [D] 3/4.2-34 3/4.2-35 3/4.2-36 [Q] 3/4.2-37	D/Q	ComEd proposes to remove Quad Cities footnote (q) and Dresden footnote (r) in Table 4.1.A-1 and footnote (k) for both Dresden and Quad Cities, in Table 4.2.E-1. These notes amend the stated frequency for CHANNEL CALIBRATION to require the calibration of the IRM Neutron Flux High during entry into applicable MODE(s), regardless of whether it had previously been performed within the stated frequency. The CTS require calibrations, but the standard definition of CHANNEL CALIBRATION being implemented in TSUP makes this requirement inappropriate. The CTS requirement that was being implemented was a chassis calibration. Per the standard TS, the appropriate test to verify operability prior to entry into a MODE where the instrument will be used is the CHANNEL FUNCTIONAL TEST, which TSUP currently requires on a frequent (startup or within 7 days prior to startup) basis. The calibration will be performed on the stated basis, such that continued OPERABILITY of the instrument is assured. This change also addresses open item 14 from the NRC staff SER dated 11/20/95 for TSUP Section 3/4.2.
3/4.2-3	Q	ComEd proposes to change the trip setpoint for Item 2.c on Table 3.2.A-1, Reactor Building Ventilation Exhaust Radiation - High, Secondary Containment Isolation trip, for Quad Cities from 3 mR/hr to 5 mR/hr. This requirement does not exist in CTS, and current practice is to set the trip at a nominal value of 3 mR/hr. This implements the design requirement to have the setpoint at approximately 2 mR/hr above background (background is about 1 mR/hr), and is well within the requirements of the ODCM calculation for off-site dose. The setpoint calculation for this instrument indicates that finding a nominal setpoint for the instrument that is sufficiently above background to minimize spurious trips, but low enough to ensure that a TSUP trip setpoint requirement of 3 mR/hr would always be met is not feasible. Changing the TSUP trip setpoint requirement to 5 mR/hr allows the technicians to continue the current practice of setting the instrument at 3 mR/hr, ensuring both a minimum of spurious trips and adequate confidence that the instrument will, in all cases, trip prior to the TSUP requirement of 5 mR/hr. This meets the design basis requirement to set the instrument approximately 2 mR/hr above background, and continues to ensure that effects to off-site dose will be insignificant.

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3/4.2-18	D	ComEd proposes to revise the CHANNEL FUNCTIONAL TEST frequencies of Items 1.d, 2.d and 3.f for the CS, LPCI and HPCI Pump Discharge Flow Low (Bypass) functions. This instrumentation closes the minimum flow valve on the respective ECCS injection system. Dresden has no CTS requirements for this instrumentation; however, a functional test of each instrument is performed during the monthly system OPERABILITY runs required by CTS 3.5.A and 3.5.C. Dresden received approval in an SER dated 12/27/95 for the upgrade to Section 3/4.5. The upgrade to Section 3/4.5 allows Dresden to replace the monthly OPERABILITY run with testing pursuant to the Inservice Testing Program (IST). The IST program allows system testing every 92 days for the ECCS systems. Plant surveillance history shows that minimum flow instrumentation has performed adequately such that a CHANNEL FUNCTIONAL TEST concurrent with the IST testing can be allowed without a reduction in minimum flow valve performance. Since past performance of the minimum flow valve instrumentation allows functional testing at a greater frequency, no change to any established safety margins will occur upon implementation of the proposed change.
3/4.2-18, 3/4.2-19, 3/4-2-20	D	ComEd proposes to add footnote (f) to the CHANNEL CALIBRATION for Items 1.a, 2.a, 3.a, 3.e and 4.a for Table 4.2.B-1 for instrumentation that initiates ECCS. In addition, Dresden proposes to revise the CHANNEL CALIBRATION frequency for Item 3.e from 'E' to 'Q' to maintain consistency with CTS requirements. Footnote (f) distinguishes the calibration frequencies for the Unit 2 analog transmitter/trip unit design from the mechanical level indicating transmitter design for Unit 3 (Yarways). The level transmitters provided on Unit 2 are not new equipment but are the same level transmitters used to provide the ATWS Recirculation Pump Trip on Low Low Reactor Water Level listed within CTS Tables 3.2.7/4.2.5. The calibration frequencies for the ATWS transmitters are stated within CTS Table 4.2.5 as "R" or once per refuel outage. Therefore, the proposed surveillances for the ECCS initiation level transmitters is once per 18 months, consistent with the current length of Dresden refuel intervals of 18 months. The trip units provided are similar to the trip units which provide the ATWS Recirculation Pump Trip on Low Low Reactor Water Level therefore a calibration frequency of every 92 days is appropriate. The proposed changes updated the TSUP Table 4.2.B-1 to reflect the current ECCS level initiation design for Unit 2 while maintaining the appropriate surveillance frequencies for Unit 3 equipment. Existing safety margins are not reduced by the proposed change.
3/4.2-24	D	ComEd proposes to retain the current functional test frequency for the instrumentation that provides the ATWS-RPT trip functions for Reactor Water Level - Low and Reactor Vessel Pressure - High. The CTS functional test frequencies are specified as once per quarter on CTS Table 4.2.5. Therefore, TSUP surveillance requirement Table 4.2.C-1 for the ATWS-RPT instrumentation has been revised to show the functional test frequencies changed from "M" to "Q". Footnote (a) to Table 4.2.C-1 requires a corresponding revision to show that the trip units are calibrated every 92 days versus 31 days. Since CTS requirements are maintained by the proposed change, the change is purely administrative and does not affect any safety margins.

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[D] 3/4.2-30, [Q] 3/4.2-31, [D] 3/4.2-35, [Q] 3/4.2-36	D/Q	Table 3.2.E-1, Item 4.a, Dresden and Quad Cities footnote (d), and Table 4.2.E-1, Item 4.a, Dresden and Quad Cities footnote (h) - ComEd proposes to delete reference to the aforementioned footnotes. In both cases, this footnote indicates that the IRM detector not full in rod block is bypassed when the IRM is on Range 1 which is inconsistent with the current plant design. The IRM detector rod block is not bypassed when the IRM is on Range 1. The proposed change is conservative in nature and accurately reflects current plant design.
[D] 3/4.2-39, [Q] 3/4.2-40	D/Q	ComEd proposes to delete mention of the HRSS system from Table 3.2.F-1, Action 62. Action 62.b allows a 30 day AOT if less than the minimum channels are OPERABLE and the HRSS combustible gas monitoring capability for the drywell is OPERABLE. This option will not be used and is thus being deleted. Action 62.c, which allows a 7-day AOT with the HRSS inoperable, will become Action 62.b, with mention of the HRSS removed. This is an administrative change, as the change simply deletes an option that would not be used.
3/4.2-41, 3/4.2-42	D	ComEd proposed to add footnote (d) to the Post Accident Monitor Instrumentation surveillance requirement Table 4.2.F-1 for the Reactor Vessel Level Instruments. The CTS definition for Instrument Calibration is slightly different from the TSUP definition of CHANNEL CALIBRATION such that the distinction provided by proposed footnote (d) becomes necessary. Calibration of the analog transmitter need not be performed at a frequency greater than 18 months. The frequency stated within TSUP Table 4.2.F-1 is Semi-Annual (SA). Additionally, the proposed footnote maintains CTS requirements for calibration of one of the Post Accident Monitor Reactor Water Level instrument and insures that a calibration of the instrument can be performed during plant conditions which allow safe performance of the surveillance. Since, CTS requirements have been retained with the proposed change, no safety margins have been affected.
[D] 3/4.2-41 [Q] 3/4.2-42	D/Q	ComEd proposes to modify the description of Items 8 and 9 within Table 4.2.F-1 to be consistent with the format of Items 8 and 9 within Table 3.2.F-1. The proposed change is administrative in nature and does not affect the TS requirements for the Drywell Hydrogen or Oxygen Concentration Analyzer and Monitor.
B 3/4.2-3	D/Q	ComEd proposes to clarify the Bases description for the Scram Discharge Volume (SDV) high water level rod block for Dresden and the Bases description for APRM downscale for Quad Cities. The proposed change for Dresden is administrative in nature and eliminates ambiguities regarding the applicability of the description for the SDV rod block by clarifying that the high water level rod block pertains to the SDV system. The proposed change for Quad Cities is administrative and maintains consistency with the description between Dresden and Quad Cities.
3/4.3-6	D/Q	ComEd proposes to change the description of the term 'power operation' in TS 3.3.D, Action 2 and Surveillance 3, from lower case to upper case to clarify ambiguities regarding Definitions as described in ComEd's November 14, 1995 submittal. As discussed in TS 1.0, Definitions, terms specified in upper case reflect Definitions throughout the TS. There is a corresponding definition for POWER OPERATION (i.e., RUN). As such, the proposed change is administrative in nature and resolves any ambiguity associated with the Definitions.

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3/4.3-20	D/Q	ComEd proposes to revise the LCO and SR numbering scheme used for the TS requirements for the EGC System. The proposed numbering scheme is revised to numeric from character representation for the major subitems. The proposed change is administrative in nature and maintains consistency in format to the TSUP program.
B 3/4.3-1	D/Q	ComEd proposes to modify the Bases for 3/4.3.A, Shutdown Margin, such that references to reactivity are consistently in the units of $\Delta k/k$. This change is administrative in nature and ensures consistency in the units used to describe Shutdown Margin in the Technical Specification Bases.
3/4.5-2 3/4.5-3	D/Q	ComEd proposes to clarify the notation for TSUP 3.5.A, Action 2, (Quad Cities footnote (f) and Dresden footnote (d)). Quad Cities footnote (f) and Dresden footnote (d) will clarify that the 30 or 7-day AOT is allowed only when the appropriate EDG is OPERABLE. This change does not modify the intent of the Actions and clarifies the originally proposed requirements to ensure appropriate EDG requirements are maintained in conjunction with ECCS availability; as such, the proposed change is administrative in nature.
3/4.5-3	Q	ComEd proposes to correct a typographical error introduced within Reference (a) for Quad Cities regarding the numbering of proposed footnotes for proposed TS 3.5.A, Action 2.b. The proposed phrase "...24 hours[(g)]." should be changed to "24 hours[(d)]." In addition, footnote (g) should be changed to footnote (d). The proposed change is administrative in nature and does not affect the TS requirements for the LPCI subsystem. Also, see discussion above for page 3/4.5-2.
3/4.6-16 3/4.6-17 3/4.6-18	D/Q	ComEd proposes to delete, from Table 4.6.J-1, the requirements to perform the Gross Beta and Gamma Activity surveillance, the Isotopic Analysis of an Off-Gas Sample, and the sampling in response to THERMAL POWER or offgas level changes, as well as increase the frequency of the Isotopic Analysis for DOSE EQUIVALENT I-131 Concentration to weekly from monthly. Also, the applicability will be limited to time periods when the main steam lines are not isolated and the format of the action statements will be modified. These changes are consistent with NUREG 1433, Rev. 1. The Gross Beta/Gamma activity and offgas isotopic analyses are not direct measures of DOSE EQUIVALENT I-131 and do not have associated LCO limits. Therefore, they are deleted. The I-131 DOSE EQUIVALENT frequency is increased in conjunction with elimination of the 72-hour gross activity surveillance. This shorter frequency will provide for adequate trending of coolant activity. The applicability is limited to those conditions which represent a potential for release of significant quantities of radioactive coolant to the environment. In MODE 2 and 3, with the main steam lines isolated, no escape path exists for significant releases and requirements for limiting the specific activity are not required.

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3/4.6-25	D	ComEd proposes to modify Dresden TS 3.6.O, Action 1, footnote (d) to correct an error regarding the term 'subsystem.' Because Dresden TS 3.6.O, LCO defines and specifies the term 'loop' for Shutdown Cooling (SDC), the appropriate term for usage within footnote (d) is 'loop'. The proposed change is administrative in nature and ensures consistency in terminology between the proposed Actions and LCOs.
3/4.7-2 3/4.7-3	D/Q	In ComEd's November 14, 1995 cleanup submittal, ComEd proposed changes to the Primary Containment Leakage specifications. Concurrently, in ComEd's November 14, 1995 submittal regarding changes in accordance with Option B to 10 CFR 50, Appendix J, ComEd proposed to delete the requirements of TSUP 3/4.7.B. ComEd proposal regarding Option B to 10 CFR 50, Appendix J, was approved by the NRC staff in a Safety Evaluation Report dated January 11, 1996. As such, the changes proposed by ComEd to pages 3/4.7-2 and 3/4.7-3 in the November 14, 1995 cleanup submittal are obsolete and are requested to be withdrawn from NRC staff consideration.
3/4.7-7	D/Q	ComEd proposes to modify the requirements for testing the TIP squib valves (TSUP 4.7.D.5.b) to be consistent with the NUREG 1433, Rev. 1. The previously submitted TSUP surveillance would require all of the squib valves to be tested each outage. NUREG 1433, Rev. 1, requires the squib valves to be tested every outage on a staggered test basis. This would result, for Quad Cities and Dresden designs, in the squib valves being tested one each outage (currently every 18 months) such that all of the valves are tested every 5 outages (currently every 90 months). This is identical to the specification currently approved for LaSalle Station, and is also the current surveillance frequency for Quad Cities and Dresden Stations, although there is not a CTS governing this surveillance. This frequency retains the current practice, implements the intent of the NUREG 1433, Rev. 1, and, thus, ensures adequate reliability of the TIP squib valves.
[D] 3/4.7-23, 3/4.7-24, 3/4.7-25	D	ComEd proposes to revise the numbering of proposed TS 3/7.P, Actions 2, 3, 4 and 5 to eliminate the gap introduced in Reference (a) by the deletion of originally proposed Actions 2 and 3. In addition, ComEd proposes to delete the term 'otherwise' from proposed Action 2. The term 'otherwise' is superfluous in the revised Action 2 and as such, is proposed for deletion. The proposed change is administrative in nature and eliminates confusion regarding the location of the required Action statements. The proposed changes does not affect the TS requirements for the SBGT system. In addition, ComEd proposes to revise the frequency for performing Dresden TSUP 4.7.P.3 for the SBGT System from 1440 hours of operation to 720 hours of operation. The proposed change conservatively ensures that charcoal adsorber operation and analysis is conservatively maintained in accordance with current industry standards (RG 1.52) and is consistent with plant operational data.
[Q] 3/4.7-24, 3/4.7-25, 3/4.7-26	Q	See summary and assessment provided above for Dresden pages 3/4.7-23, 3/4.7-24, 3/4.7-25, first paragraph only regarding the administrative re-numbering of 3/4.7.P, Actions.

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3/4.8-7	D/Q	ComEd proposes to revise the frequency for performing TSUP 4.8.D.4 for the CREF System from 1440 hours of operation to 720 hours of operation. The proposed change conservatively ensures that charcoal adsorber operation and analysis is conservatively maintained in accordance with current industry standards (RG 1.52) and is consistent with plant operational data. In addition, ComEd has included the description of footnote '*' on the bottom of page 3/4.8-7. The proposed addition of the description of footnote '*' to the bottom of page 3/4.8-7 eliminates any potential ambiguity regarding the applicability of the footnote and is purely administrative in nature.
3/4.8-8	D/Q	ComEd proposes to change the ANSI reference in section 4.8.D.5.d for the CREF heater power dissipation test to ANSI N510-1989, from ANSI N510-1980. The heater power dissipation test is described in the 1989 ANSI standard. This change was previously submitted for the heater test for SBGT, and was overlooked for the CREF heater. This is an administrative change.
B 3/4.8-4	D	ComEd proposes to revise the Bases description for the Liquid Holdup Tanks. The originally proposed description refers to 'Table II' which is inconsistent with the description of the revised 10 CFR 20. In addition, the remaining description including 'potable water supply and the nearest surface water supply' is superfluous and unnecessary for inclusion within the TS Bases. The proposed change is administrative in nature and does not affect the TS requirement for the Liquid Holdup tanks.
3/4.9-17	D/Q	ComEd proposes to modify the 250 volt D.C. power distribution requirements to require Turbine Building motor control center (TB MCC) number 1 for Unit 1 and TB MC number 2 for Unit 2 (Units 2 and 3 for Dresden, respectively). The LCO description for the Reactor Building (RB) motor control centers are similarly being revised for Dresden - to maintain consistency in format with Quad Cities. These MCCs are not required for the operability of the opposite Unit's 250 volt D.C. system. Therefore, this change does not affect the assurance of available 250 volt D.C power.
3/4.9-21	D/Q	ComEd proposes to modify the APPLICABILITY and CHANNEL FUNCTIONAL TEST frequency for the RPS power monitoring channels to conform with NUREG-1433, Revision 1. CTS and previously submitted TSUP require performance of the functional test prior to entry into the refuel mode when the unit has been in cold shutdown for more than 24 hours. NUREG 1433, Revision 1, provides a footnote for both MODE(s) 4 and 5 that the RPS power monitors are not required unless a rod is withdrawn (proposed TSUP footnote (a) and states that the CHANNEL FUNCTIONAL TEST is only required when going from MODE 4 to MODE 3 or 2 (proposed TSUP footnote (b)). The previously submitted TSUP only included footnote (a) to MODE 4. The proposed changes assures that the surveillance will be performed during any shutdown of sufficient length, prior to starting up from that shutdown. Therefore, implementing the NUREG-1433, Revision 1, specification assures that the RPS monitoring channels will be operable and tested at the appropriate frequency without providing unnecessary risk of unit trip and spurious isolations.

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B 3/4.9-2	D/Q	In Reference (a), ComEd proposed to delete TS 3.9.A, Action 8 from the TS. The proposed change is consistent with the current licensing basis for the plant which does not include specific reporting criteria for the plant's diesel generators. To be consistent with the changes proposed in Reference (a), ComEd proposes to delete the TS Bases reference for diesel generator reporting requirements in 3/4.9.A. The proposed change is administrative in nature and ensures consistency with the changes proposed in Reference (a).
B 3/4.9-6	D/Q	ComEd proposes to delete the statement, "With the alternate 125 volt battery in service, the normally open breaker on the DC Reserve Bus is placed in the open position and posted, i.e., "tagged out." This is a detail of operation that is appropriately controlled with administrative controls and is inappropriate in the Technical Specification Bases.
3/4.10-6	D/Q	ComEd proposes to relocate the TS requirements for 3/4.10.D, "Decay Time," to the plant's UFSAR. The proposed change is consistent with NUREG-1433 which relocates such requirements to the plant's UFSAR. The proposed change clarifies existing discrepancies between the UFSAR and TSUP 3/4.10.D and continues to ensure that plant refueling operations are conducted in accordance with the plant's UFSAR. The TS Bases are modified accordingly.
3/4.10-10	D/Q	ComEd proposes to modify the acceptance criteria in proposed TS 3.10.H, LCO to eliminate ambiguities associated with the minimum water level requirements. Changing the acceptance criteria to "...≥33 feet" provides allowances for water levels in the spent fuel pool greater than the minimum value. The proposed change is administrative in nature and ensures appropriate water levels are maintained for the spent fuel pool at the sites.
3/4.10-16	Q	The title/header for Section 3/4.10.L is incorrect. The title was originally listed as "3/4.3.L." The correct title/header should be "3/4.10.L." The proposed change is administrative in nature.
B 3/4.10-2	D/Q	The proposed change updates the TS Bases to reflect the changes discussed above for the relocation of TS 3/4.10.D, "Decay Time," to the plant's UFSAR.
6-9	D/Q	ComEd proposes to clarify the requirements for process sampling in proposed TS 6.8.D.1. The proposed change defines that process sampling for the plant includes "post accident sampling of the reactor coolant and containment atmosphere". The proposed change is administrative in nature and consistent with the current licensing basis and plant design.
6-11	D/Q	ComEd proposes to eliminate the Definitions for MEMBER OF THE PUBLIC, CONTROLLED AREA, UNRESTRICTED AREA, RESTRICTED AREA, and SITE BOUNDARY, proposed footnotes (a), (b), (c), (d), and (e), respectively. These definitions are currently included in 10 CFR 20 and therefore, are unnecessary for inclusion in the TS. The change from upper case to lower case for each occurrence of the terms are also proposed within this revision. The proposed change is administrative in nature and does not affect plant TS requirements.
6-12	D/Q	See above description for page 6-11.

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6-13	D/Q	ComEd proposes to revise the specified submittal date for the Annual Report from "... prior to March 1 of each year" to "... prior to May 1 of each year." The proposed change is consistent with the requirements specified in NUREG-1433 and maintains consistency with 10 CFR 20 and proposed TS 6.9.A.3 for the Annual Radiological Environmental Report. Although the date of the submittal is proposed for revision, the proposed change is administrative in nature as the report will continue to be submitted on an annual basis.
6-14	D	ComEd proposes to clarify the acronym for the Steady State Linear Heat Generation Rate (SLHGR) to ensure consistency with proposed TS 3/4.11.D. The proposed change is administrative in nature and does not affect existing TS requirements.
[D] 6-18 [Q] 6-19	D/Q	ComEd proposes to revise the nomenclature of footnote (f) to footnote (a). The proposed change is a result of the aforementioned elimination of footnotes (a), (b), (c), (d) and (e), as discussed previously. The proposed change is administrative in nature and does not affect the proposed TS requirements.
[D] 6-19 [Q] 6-20	D/Q	ComEd proposes to delete proposed TS 6.12.B.4 regarding emergency situations. Based upon discussions with members of the NRC staff, in the event of emergency situations which involve personnel injury or actions taken to prevent major equipment damage (i.e., to protect the public health and safety), 10 CFR 50.54(x) prescribes deviation from the TS or license conditions when the TS or license condition do not provide immediate apparent protection. As such, the proposed requirements are redundant to 10 CFR 50.54(x).
[D] 6-20 [Q] 6-21	D/Q	ComEd proposes to clarify the review and acceptance criteria specified in proposed TS 6.13.A.2 for changes to the Process Control Program (PCP). The proposed changes modify TS 6.13.A.2 from "... after approval of ..." to include the phrase "... after review and acceptance, including approval by ...". ComEd did not include specific reference to 'on-site' review as the explicit definition of on-site review has been relocated to the QA Topical Report. However, the proposed change ensures that appropriate plant on-site review and acceptance is mandatory for any such changes to the PCP. The proposed change is administrative in nature, consistent with NUREG-1433 and is based upon the precedence of the Clinton Power Station terminology for similar requirements.
[D] 6-21 [Q] 6-22	D/Q	ComEd proposes to clarify the review and acceptance criteria specified in proposed TS 6.14.A.2 for changes to the Offsite Dose Calculational Manual (ODCM). The proposed changes modify TS 6.14.A.2 from "... after approval of ..." to include the phrase "... after review and acceptance, including approval by ...". ComEd did not include specific reference to 'on-site' review as the explicit definition for this term has been relocated to the QA Topical Report. However, the proposed change ensures that appropriate plant on-site review and acceptance is mandatory for any such changes to the ODCM. The proposed change is administrative in nature, consistent with NUREG-1433 and is based upon the precedence of the Clinton Power Station terminology for similar requirements.

ATTACHMENT B

MARKED-UP TSUP PAGES
DRESDEN NUCLEAR POWER STATION
LICENSE NOS. DPR-19 AND DPR-25