

Commonwealth Edison Company
Dresden Generating Station
6500 North Dresden Road
Morris, IL 60450
Tel 815-942-2920



August 16, 1996

JSPLTR: 96-0128

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

Subject: Dresden Nuclear Power Station Units 2 and 3
Request to Postpone Implementation of the Upgrade to Technical
Specifications (TSUP)
NRC Docket Nos. 50-237 and 50-249

References: (a) R. M. Pulsifer (USNRC) to D.L. Farrar (ComEd) dated 06/28/96

In Reference (a), the NRC approved the upgrade to Dresden Technical Specifications (TSUP) for Unit 2 (DPR-19, Amendment 150) and Unit 3 (DPR-25, Amendment 145). Associated with that approval was the requirement to implement TSUP within 90 days of June 28, 1996 or by September 26, 1996. Dresden's plans to implement TSUP were strategically linked to the following plant configurations: 1) After completion of D2R14, 2) With both Unit 2 and Unit 3 above 30% rated reactor power, and 3) Prior to the next Unit 3 refueling outage, D3R14. The fourteenth refueling outage for Unit 2 (D2R14) ended on April 25, 1996. However, Unit 2 has been in a forced outage since May 31, 1996 to correct deficiencies associated with the Feedwater Control System and 4KV breakers. Unit 3 has been in a forced outage since June 21, 1996 to allow inspection and correction of potential 4KV breaker deficiencies similar to those identified on Unit 2. The Unit 2 expected return to service is August 22, 1996, however, the return to service of Unit 3 has been delayed due to the discovery of Main Generator Stator cooling water leaks between the supply hose and stator bars. The expected return to service of Unit 3 has not been determined since inspections to determine the full scope of the corrective actions is on-going. Based on the uncertainty with the schedule of the return to service of Unit 3, the desired plant status of both Units 2 and 3 above 30% rated reactor power may not be met by September 26, 1996.

ADD 1/10

9608260443 960816
PDR ADOCK 05000237
P PDR

2

Therefore, ComEd requests to defer implementation of the Technical Specification Upgrade until on or before January 15, 1997. ComEd is requesting that this be processed as a correction to the amendment. In the event this cannot be processed as an amendment we have evaluated this as an amendment request. The proposed extension will allow ComEd to complete the forced outage on Unit 3 without the need for approval of the TSUP implementation extension under exigent circumstances.

ComEd has completed procedure revisions, operator training, and surveillance program updates but has a few administrative tasks still remaining to be completed prior to implementation.

In Reference (a), ComEd received approval to defer several surveillances that were new requirements which needed plant configurations typically scheduled during a refueling outage. Also within Reference (a) the staff recommended that these surveillances be performed as soon as possible but may be deferred to the next refueling outage. Among these surveillances was the simultaneous start of the Emergency Diesel Generators required by TSUP surveillance requirement 4.9.A.9 for Unit 2 and Unit 3. In keeping with the staff's recommendation, ComEd has completed the simultaneous start of the Unit 3 and Unit 2/3 Emergency Diesel Generators which makes the TSUP surveillance requirement 4.9.A.4 current for Unit 3. Therefore, ComEd requests to remove the simultaneous Emergency Diesel Start surveillance requirement 4.9.A.9 from the list of surveillances deferred to the next refueling outage for Unit 3 only.

ComEd has evaluated the proposed request to defer TSUP implementation and determined that it involves no significant hazards consideration. According to 10 CFR 50.92(c), a proposed amendment to an operating license involves no significant hazards consideration if operation of the facility, in accordance with the proposed amendment, would not:

- 1) Involve a significant increase in the probability or consequences of an accident previously evaluated; or
- 2) Create the possibility of a new or different kind of accident from any accident previously evaluated; or
- 3) Involve a significant reduction in a margin of safety.

The proposed schedule changes do not involve a significant increase in the probability or consequences of an accident previously evaluated because:

In general, the Technical Specification provisions approved under TSUP represent the conversion of current requirements to a more generic format, or the addition of requirements which are based on the current safety analysis. The delay of implementation of TSUP will result in delay in the incorporation of provisions that provide increased reliability of equipment assumed to operate in the current safety analysis, or provide continued assurance that specified parameters remain within their acceptance limits. A deferral in the implementation of the TSUP will not result in alteration of the precursors associated with the transients and accidents that the current technical specifications and TSUP are based on. Therefore, the deferral of TSUP implementation does not significantly increase the probability or consequences of a previously evaluated accident.

Create the possibility of a new or different kind of accident from any previously evaluated because:

In general, the Technical Specifications provisions approved under TSUP represent the conversion of current requirements to a more generic format, or the addition of requirements which are based on the current safety analysis. TSUP provisions also represent minor curtailments of the current requirements which are based on generic guidance or previously approved provisions for other licensees. The changes to the Technical Specification approved under TSUP have not required design changes to the plant nor will the deferral of TSUP result in the creation of any design changes to Dresden Station. No new modes of equipment operation are introduced by the deferral of TSUP implementation. The deferral of TSUP implementation will maintain at least the present level of operability. Therefore, the proposed changes do not create the possibility of a new or different kind of accident from any previously evaluated.

USNRC
August 16, 1996

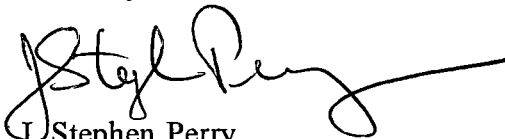
Page 4

Involve a significant reduction in the margin of safety because:

Some individual changes under TSUP included the adoption of new requirements which will provide enhancement of the reliability of the equipment assumed to operate in the safety analysis, or provide enhanced assurance that specified parameters remain within their acceptance limits. The deferral of TSUP implementation will result in delay of realization of the addition of the enhanced provisions, but in no way creates an inadequacy of the current Technical Specifications to maintain the existing margin of safety. The margin of safety in the current Technical Specifications is adequate and is not reduced by the deferral of TSUP.

ComEd plans to implement TSUP when at least all of the aforementioned desired plant conditions have been met, but requests deferral to 1997 to provide sufficient margin to account for any unforeseen need to adjust the schedule any further. Please direct any questions to F. A Spangenberg, Regulatory Assurance Manager.

Sincerely,

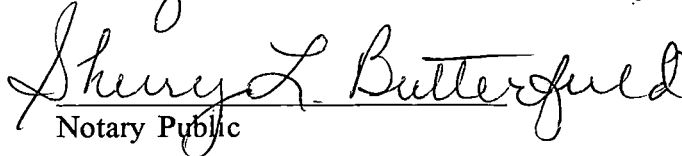


L Stephen Perry
Vice President
Dresden Nuclear Power Station

Subscribed and Sworn to before me

on this 16 day of

August, 1996.



Notary Public

cc: A. W. Beach, Regional Administrator - RIII
J. F. Stang, Project Manager - NRR
C. L. Vanderniet, Senior Resident Inspector - Dresden
Office of Nuclear Facility Safety - IDNS