

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



October 3, 1996

JSPLTR #96-0174

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

SUBJECT: Dresden Nuclear Power Station Units 2 and 3
Request for Amendment to Facility Operating Licenses DPR-19 and
DPR-25, Appendix A, Technical Specifications
Table 4.2.F.1 Accident Monitoring Instrumentation
Surveillance Requirements
OPERATIONAL MODES Requirements
NRC Docket Nos. 50-237 and 50-249

- References:
- 1) P.L. Piet letter to the U.S. NRC, dated November 14, 1995,
(ComEd submittal regarding TSUP clean-up package).
 - 2) J. Stephen Perry letter to the U.S. NRC, dated March 1, 1996,
(ComEd supplement to Application for Amendment to Operating
Licenses as a result of the TSUP).

Pursuant to 10 CFR 50.90, ComEd proposes to amend Appendix A, Technical Specifications Table 4.2.F.1 for "Accident Monitoring Instrumentation Surveillance Requirements" of Facility Operating Licenses DPR-19 and DPR-25. The purpose of this amendment request is to correct a typographical error which was introduced into the Technical Specifications with issuance of amendment numbers 150 and 145. These amendments have not yet been implemented, and this change is requested to support the timely and appropriate application of the upgraded Dresden Technical Specifications.

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The column titled Applicable OPERATIONAL MODE(s) in Table 3.2.F-1, "Accident Monitoring Instrumentation," lists OPERATIONAL MODEs 1 and 2 for instrument 11, (Source Range) Neutron Monitors (SRMs), and OPERATIONAL MODEs 1, 2, and 3 for instrument 12, Drywell Radiation Monitors (DRMs). Table 4.2.F-1, "Accident Monitoring Instrumentation Surveillance Requirements," was inadvertently submitted and subsequently issued with the OPERATIONAL MODEs for SRMs and DRMs reversed, i.e. with SRMs listing MODEs 1, 2, and 3, and DRMs listing MODEs 1 and 2.

This inconsistency is the result of a typographical error in the preparation of a submittal which was made requesting the changes issued as amendments 150 and 145 for Dresden Units 2 and 3 respectively. This error and resultant inconsistency are not applicable to the ComEd Quad Cities Technical Specifications.

The proposed change is consistent with the requested and intended changes as described in our letter from P.L. Piet to the U.S. NRC dated November 14, 1995, Clean-Up Package, Attachment B (reference 1) which correctly listed the Applicable OPERATIONAL MODE(s). The error was apparently introduced in our submittal dated March 1, 1996 from J. Stephen Perry to the U.S. NRC, in attachment C, page 3/4.2-41 (reference 2).

The proposed Technical Specification Amendment is subdivided as follows:

1. Attachment A provides a description and safety analysis of the proposed changes.
2. Attachment B provides the proposed changes to the Technical Specifications pages on a marked-up copy of page 3/4.2-41 issued as part of amendment numbers 150 and 145.
3. Attachment C describes ComEd's evaluation performed in accordance with 10 CFR 50.92 (c) which confirms that no significant hazards consideration is involved. In addition, ComEd's Environmental Assessment Applicability Review is included.
4. Attachment D provides the proposed replacement page 3/4.2-41.


This proposed Technical Specification amendment has been reviewed and approved by ComEd On-Site and Off-Site Review in accordance with ComEd procedures.

ComEd requests NRC approval of this request within 60 days of receipt of this submittal. Approval of this amendment allows Dresden the opportunity to utilize the proposed changes when the Technical Specification Upgrade Program specifications are implemented.

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.

If there are any questions concerning this matter, please contact P. G. Holland, Dresden Regulatory Assurance Supervisor.

Sincerely,


Stephen Perry
Site Vice President
Dresden Station

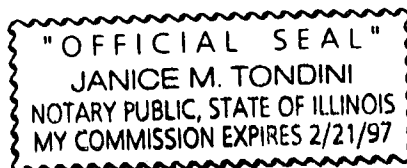
- Attachments:
- A. Description and Safety Assessment of Proposed Change
 - B. Marked-Up Technical Specification Page
 - C. Significant Hazards Consideration and Environmental Assessment Applicability Review
 - D. Replacement Technical Specification Page

cc: A. W. Beach, Regional Administrator, Region III
NRC Resident Inspector's Office
Illinois Department of Nuclear Safety
J. Stang, Dresden Project Manager

Signed before me on this 3rd day,

of October, 1996,

by Janice M. Tondini
Notary Public



Attachment A
Description and Safety Assessment of Proposed Change

Description of the Proposed Change

The proposed license amendment request consists of changing the Applicable OPERATIONAL MODE(s) entries of Table 4.2.F-1, "Accident Monitoring Instrumentation Surveillance Requirements" to correspond exactly with those in Table 3.2.F-1, "Accident Monitoring Instrumentation" Limiting Conditions for Operations.

The change requested will modify the Applicable OPERATIONAL MODE(s) entry for instrument 11, "(Source Range) Neutron Monitors" (SRMs) from "1, 2, 3" to "1, 2". It will also change the Applicable OPERATIONAL MODE(s) entry for instrument 12, "Drywell Radiation Monitors" (DRMs) from "1, 2" to "1, 2, 3". These changes will restore consistency between Table 3.2.F-1 and Table 4.2.F-1 with regard to applicable OPERATIONAL MODE(s) for the Limiting Conditions for Operation and the associated Surveillance Requirements.

Description of the Current Technical Specification Requirement

The current Technical Specification requirements, as described in amendments 150 and 145 for Dresden Units 2 and 3 respectively, list the Applicable OPERATIONAL MODE(s) entry for SRMs and DRMs in Table 4.2.F-1 swapped. The current requirements for SRMs are listed as OPERATIONAL MODE(s) 1, 2, 3 and for DRMs are listed as OPERATIONAL MODE(s) 1, 2. Table 3.2.F-1 lists the Applicable OPERATIONAL MODES for SRMs as 1, 2 and for DRMs as 1, 2, 3.

Bases for the Current Requirement

The current requirements of Table 4.2.F-1 were based on an erroneous submittal dated March 1, 1996 from J. S. Perry to the U.S. N.R.C. The requirements should have been consistent with those of Table 3.2.F-1.

The instrumentation listed in the two tables are generally applicable in OPERATIONAL MODEs 1 and 2, however the DRMs were specified to assure their OPERABILITY in MODEs 1, 2, and 3 for consistency with the OPERABILITY requirements described in NUREG-0123, Rev. 4, Standard Technical Specifications (STS). STS Table 3.3.2-1, "Isolation Actuation Instrumentation," Trip Function 1.g, "Drywell and/or Suppression Chamber Radiation - High" lists the Applicable OPERATIONAL CONDITIONS for isolation of STS valve group 2 on high Drywell Radiation as 1, 2 and 3. This was incorporated into the Accident Monitoring Instrumentation requirements of 3/4.2.F of the Dresden Technical Specifications to provide clear and consistent direction to the plant operators regarding the need to maintain the OPERABILITY of the Drywell Radiation Monitors for both of its design functions, accident monitoring and STS valve group 2 isolation.

Description of the Need for Amending the Technical Specifications

The proposed change is needed to assure that the appropriate and intended surveillance requirements are specified for SRMs and DRMs as listed in Table 4.2.F-1. The proposed change will, in concert with the requirements of sections 3.0 and 4.0 of the specifications, assure that the appropriate surveillance requirements are specified during the OPERATIONAL MODEs in which the instruments are required to be OPERABLE as described in Table 3.2.F-1. Dresden has not yet fully implemented amendments 150 and 145 to the Units 2 and 3 Technical Specifications, and this change will assure that the appropriate surveillance requirements are specified when the amendments are adopted.

Bases for the Amended Technical Specification Request

ComEd has reviewed the voluminous and extensive documentation and correspondence between the company and the NRC regarding issuance of amendments 150 and 145 to the Dresden operating licenses. The bases for this request is that the requirements listed in the March 1, 1996 submittal inappropriately listed the Applicable OPERATIONAL MODE(s) for SRMs and DRMs of Table 4.2.F-1. This is supported by earlier correspondence with the Commission, e.g. the November 14, 1995 submittal in response to the Request for Additional Information regarding these amendments, which listed the appropriate Applicable OPERATIONAL MODE(s) in Table 4.2.F-1.

This change does not represent a substantive change from the reviewed submittal, or the approved amendments. The first part of the change will be the relaxation of a requirement to perform surveillance testing of the SRMs prior to and during operation in OPERATIONAL MODE 3, when the SRMs are not required to be OPERABLE. This would result in an illogical requirement to perform a test, without regard to its outcome, and which does not provide any discernable useful information, i.e. no trending or evaluation data is gathered from performance of such a surveillance. The second part of the change will be the addition of a requirement to satisfy the surveillance requirements for the DRMs prior to and during operation in OPERATIONAL MODE 3, consistent with the OPERABILITY requirements in Table 3.2.F-1.

ComEd believes this was an isolated incident as the result of a typographical error at an unknown point during the typing, formatting, reviewing or editing of the information submitted on March 1, 1996. Based on this, the company requests that the Applicable OPERATIONAL MODE(s) requirements of Table 4.2.F-1 be modified to exactly duplicate those of Table 3.2.F-1, as shown in the following attachments.