Attachment B

Marked-Up Technical Specification Pages

Effected and Included Page

3/4.2-41

TABLE 4.2.F-1

ACCIDENT MONITORING INSTRUMENTATION
SURVEILLANCE REQUIREMENTS

INSTRUMENTATION	CHANNEL CHECK	CHANNEL CALIBRATION	Applicable OPERATIONAL MODE(s)
1. Reactor Vessel Pressure	M	SA	1, 2
2. Reactor Vessel Water Level	M	SA [d]	1, 2
3 Torus Water Level	M	A	1, 2
4. Torus Water Temperature	M	A	1, 2
5. Drywell Pressure - Wide Range	M	E	1, 2
6. Drywell Pressure - Narrow Range	M	Q	1, 2
7. Drywell Air Temperature	M	E	1, 2
8. Drywell Oxygen Concentration - Analyzer and Monitor	M	Q	1, 2
9. Drywell Hydrogen Concentration - Analyzer and Monitor	M	Q	1, 2
10. Safety/Relief Valve Position Indicators - Acoustic & Temperature	M[c]	E	1, 2
11. (Source Range) Neutron Monitors	M	Q[b]	1, 2, 3
12. Drywell Radiation Monitors	M	E[a]	1, 2, 3
13. Torus Pressure	M	Q	1, 2

Attachment C

Significant Hazards Consideration and Environmental Assessment Applicability Review

The Commission has provided standards for determining whether no significant hazards consideration exists as stated in 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, (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 change merely corrects a typographical error which was introduced at the end of the voluminous and extensive preparation, review and approval process applied to the ComEd Technical Specification Upgrade Project. The typographical error introduced a discrepancy into the Applicable OPERATIONAL MODE(s) column of Table 4.2.F-1 such that it is no longer consistent with the corresponding Table 3.2.F-1 for the (Source Range) Neutron Monitors (SRMs) and Drywell Radiation Monitors (DRMs). The proposed change restores Table 4.2.F-1 to exact correspondence with the requirements of Table 3.2.F-1.

ComEd has evaluated the proposed Technical Specification Amendment and determined that it does not represent a significant hazards consideration. Based on the criteria for defining a significant hazards consideration in 10 CFR 50.92, operation of the Dresden Units 2 and 3 in accordance with the proposed amendment will not:

1) **Involve a significant increase in the probability or consequences of an accident previously evaluated because of the following:**

The proposed change does not alter the manner of operation of the facility, it merely restores the correspondence between the applicability of the Limiting Conditions for Operability (LCO) for the (Source Range) Neutron Monitors and the Drywell Radiation Monitors and the associated Surveillance Requirements for the same two instrument functions as described in Tables 3.2.F-1 and 4.2.F-1.

No changes are proposed which will affect the probability of an accident previously evaluated, since the instruments and their associated functions are credited to operate during and after a postulated accident. The function of a device after an event has occurred cannot affect the probability of that accident occurring. Similarly, the proposed changes do not effect the operation or function of structures, systems or components which effect the probability of any accident previously evaluated.

The proposed changes do not affect the consequence of an accident previously evaluated since the changes do not decrease the availability of any functions credited with performing mitigative actions. The availability requirements of the Drywell Radiation Monitors is not changed because the associated LCO requires the monitors to be OPERABLE in the conditions proposed in this change. The proposed change merely assures that the surveillance requirements are met in the modes which correspond to the LCO. The (Source Range) Neutron Monitor surveillance requirements change does not affect the ability of the system to provide adequate information to the operators to mitigate the consequences of a postulated accident, since the system OPERABILITY requirements as specified in the LCO are not affected.

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

The proposed change does not introduce any new or different types of operation of the plants. No new equipment is introduced as a result of the implementation of the proposed change. Therefore no changes are proposed which could introduce a new or different kind of accident from any previously evaluated.

3) Involve a significant reduction in the margin of safety because:

The proposed change does not effect the margin of safety. The LCO requirements for the two instrument systems which are effected are not changed; the OPERABILITY requirements remain the same. The only substantive changes are the modes in which surveillance testing is required to be performed. The change restores the need to perform testing of the Drywell Radiation Monitor prior to and during OPERATIONAL MODE 3 operations, and removes the requirement to perform testing of the (Source Range) Neutron Monitors prior to and during operation in MODE 3 when it is not required to be OPERABLE as described in the associated LCO. Based on this, the availability of the affected instruments to perform their design function is not effected by this change and no reduction in the margin of safety is proposed.

Guidance has been provided in "Final Procedures and Standards on No Significant Hazards Considerations," Final Rule, 51 FR 7744, for the application of standards to license change requests for determination of the existence of significant hazards considerations. This document provides examples of amendments which are and are not considered likely to involve significant hazards considerations.

This proposed amendment does not involve any irreversible changes, significant relaxation of the criteria used to establish safety limits, a significant relaxation of the bases for the limiting safety system settings, or a significant relaxation of the bases for the limiting conditions for operations. Therefore, based on the guidance provided in the Federal Register and the criteria established in 10 CFR 50.92(c), the proposed change does not constitute a significant hazards consideration.

Environmental Assessment

ComEd has evaluated the proposed amendment against the criteria for identification of licensing and regulatory actions requiring environmental assessment in accordance with 10 CFR 51.21. It has been determined that the proposed changes meet the criteria for a categorical exclusion as provided under 10 CFR 51.22(c)(9). This conclusion has been determined because the changes requested do not pose significant hazards consideration, do not involve a significant increase in the amounts, and no significant changes in the types, of any effluent that may be released off-site. Additionally, this request does not involve a significant increase in individual or cumulative occupational radiation exposure.

Attachment D

Replacement Technical Specification Page

3/4.2-41

TABLE 4.2.F-1

ACCIDENT MONITORING INSTRUMENTATION
SURVEILLANCE REQUIREMENTS

INSTRUMENTATION	CHANNEL CHECK	CHANNEL CALIBRATION	Applicable OPERATIONAL MODE(s)
1. Reactor Vessel Pressure	M	SA	1, 2
2. Reactor Vessel Water Level	M	SA[d]	1, 2
3 Torus Water Level	M	A	1, 2
4. Torus Water Temperature	M	A	1, 2
5. Drywell Pressure - Wide Range	M	E	1, 2
6. Drywell Pressure - Narrow Range	M	Q	1, 2
7. Drywell Air Temperature	M	E	1, 2
8. Drywell Oxygen Concentration - Analyzer and Monitor	M	Q	1, 2
9. Drywell Hydrogen Concentration - Analyzer and Monitor	M	Q	1, 2
10. Safety/Relief Valve Position Indicators - Acoustic & Temperature	M[c]	E	1, 2
11. (Source Range) Neutron Monitors	M	Q[b]	1, 2
12. Drywell Radiation Monitors	M	E[e]	1, 2, 3
13. Torus Pressure	M	Q	1, 2