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December 30, 1996
JSPLTR #96-0240

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

Subject: Dresden Nuclear Power Stations Units 2 and 3
Supplement to Application for Amendment of Facility
Operating Licenses DPR-19 and DPR-25
Technical Specifications
NRC Docket Nos. 050-237 and 050-249

References: A. R. E. Querio to USNRC letter dated April 8, 1996,
LaSalle County Nuclear Power Station Units 1 and 2
Application for Amendment Request to Facility
Operating Licenses NPF-11 and NPF-18,
Technical Specification Changes for Siemens Power
Corporation Fuel Transition
Docket Numbers 50-373 and 50-374

B. J. Stephen Perry to USNRC letter dated June 20, 1996,
Dresden Nuclear Power Stations Units 2 and 3
Application for Amendment of Facility Operating
License DPR-19 and DPR-25
Technical Specifications
NRC Docket Nos. 050-237 and 050-249

Pursuant to 10 CFR 50.90, Commonwealth Edison Company submitted the Reference B document to revise the Technical Specifications to provide for the addition of Siemens Power Corporation (SPC) Atrium-9B Nuclear Fuel. The purpose of this letter is to supplement Reference B to address revisions that were required for the approval of Reference A for LaSalle County Station. Reference B is also being supplemented to address three items discussed with the NRC staff.

Reference B proposed adding Siemens Power Corporation topical reports to the Technical Specifications in Section 6.6.b. This letter revises that change by listing the specific NRC approval date and the revision/supplement for each of the new topical reports. This letter also revises the section 5.3.A description of fuel assemblies from that proposed in Reference B. Reference B proposed that "...Limited substitutions of zirconium alloy or stainless steel filler rods for fuel rods, in accordance with NRC-approved applications of fuel rod configurations, may be used....". The term "zirconium alloy" is being revised to "Zircaloy or ZIRLO,"

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which are the only zirconium alloys allowed by 10 CFR 50.46. The revised marked up Technical Specification pages are included as an Attachment to this letter. These two changes were addressed during the approval of the Reference A submittal for LaSalle County Station.

Additionally, the following revisions to Reference B are proposed to address issues discussed with the NRC staff:

1. Technical Specification Bases Section 2.1.B. ComEd proposes to withdraw the change that replaced the words "transition boiling" with "fuel cladding failure due to overheating/dryout." The text should read "transition boiling" when discussing the operation of a fuel assembly with a MCPR equal to the Safety Limit.
2. Technical Specification Bases Section 3/4.11.A. ComEd proposes to withdraw the change that replaced "Appendix K of 10 CFR Part 50" with "10 CFR 50.46." The text should read "Appendix K of 10 CFR Part 50" when discussing the LOCA evaluation model requirements.
3. Technical Specification Bases Section 3/4.6.F. ComEd proposes to withdraw the "Insert C" discussion on the ASME overpressurization event and instead add a clarifying statement as "Insert C" that describes the SPC methodology for analyzing the event.

With the exception of the above proposed changes, the Description and Evaluation (Attachment A) provided in Reference B is unaffected. Furthermore, the Evaluation of Significant Hazards (Attachment C), Environmental Assessment Applicability Review (Attachment D), and the Identification and Description of Any Irreversible Consequences (Attachment E) of Reference B are unchanged and consistent with the proposed changes herein.

The revised Technical Specification changes are attached. These pages directly replace the corresponding pages in Reference B. Please note that in Reference B, "Insert C" was a separate insert, but in this transmittal, it is a single sentence added to page B3/4.6-3. The "Insert D" and "Insert E" on the enclosed page B3/4.11-1 are unchanged from Reference B, but are provided for completeness.

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

To the best of my knowledge and belief, the statements contained in this transmittal are true and correct. In some respect these statements are not based on my personal knowledge, but obtained information furnished by other ComEd employees, contractor employees, and consultants. Such information has been reviewed in accordance with company practice, and I believe it to be reliable.

ComEd is notifying the State of Illinois of this application for amendment by transmitting a copy of this letter and its Attachment to the designated state official.

Please direct any questions you may have concerning this submittal to this office.

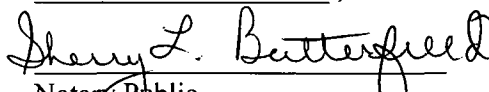
Respectfully,

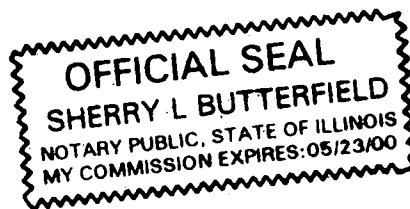

J. Stephen Perry
Dresden Site-Vice President

Subscribed and Sworn to before me

on this 30 day of

December, 1996.


Notary Public



Attachment: Revised Technical Specification Pages for Dresden Units 2 and 3.

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