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January 24, 19967

JSPLTR 97-0013

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

SUBJECT:

270235

A Unicom Company

Dresden Nuclear Power Station Units 2 and 3 Request for Amendment to Facility Operating Licenses DPR-19, DPR-25, Appendix A, Technical Specifications (TS), Changes to Technical Specification Table 4.2.B-1, NRC Docket Nos. 50-237/249.

Pursuant to 10 CFR 50.90, ComEd proposes to amend Appendix A, Technical Specifications Table 4.2.B-1 "ECCS Actuation Instrumentation Surveillance Requirements" of Facility Operating Licenses DPR-19 and DPR-25. The purpose of this amendment request is to amend the aforementioned requirements to establish channel calibration surveillance requirements for the Emergency Core Cooling System Reactor Vessel Water level instrumentation and for consistency in table notation as a human factors consideration. The proposed changes are based upon the precedent set forth in the surveillance requirements for the corresponding instrumentation in the Dresden Unit 2 Technical Specifications dated June 28, 1996. The changes are also patterned after allowances provided in NUREG 1433, Rev. 1 which permit similar actions.

The proposed Technical Specification Amendment is subdivided as follows:

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- 1. Attachment A gives a description and safety analysis of the proposed changes.
- 2. Attachment B includes the proposed changes to the Technical Specifications pages, including marked-up versions of the current pages.
- 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.

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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 by April 1, 1997, with the amendment to be effective no later than 60 days following approval. Approval of this amendment allows Dresden the opportunity to perform surveillance testing on the changed reactor vessel water level instrumentation.

To the best of my knowledge and belief, the statements contained above are true and correct. In some respect these statements are not based on my personal knowledge, but obtained information furnished by other Commonwealth Edison 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 attachments to the designated state official.

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

Sincerely,

Stephen Perry

Vice President Dresden Station

Subscribed and Sworn to before me

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USNRC January 24, 1997

Attachments:

- A. Description and Safety Analysis of the Proposed Changes
- B. Marked-Up Technical Specification Pages
- C. Evaluation of Significant Hazards Considerations and Environmental Assessment Applicability Review

cc: A. Bill Beach, Regional Administrator - RIII

C. G. Miller, Senior Resident Inspector - Quad Cities

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R. J. Singer, MidAmerican Energy Company

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## <u>ATTACHMENT A</u> <u>Description and Safety Analysis of the Proposed Change</u>

## **DESCRIPTION of the PROPOSED CHANGE**

Pursuant to 10 CFR 50.90, ComEd proposes to amend Appendix A, Technical Specifications Table 4.2.B-1 "ECCS Actuation Instrumentation Surveillance Requirements" and the accompanying note (f) of Facility Operating Licenses DPR-19 and DPR-25.

The proposed license amendment will change note (f) of Table 4.2.B-1 to remove implication of a unit difference in instrumentation for the Reactor Vessel Water Level instrumentation. The proposed changes will modify note (f) of table 4.2.B-1 as follows (*additions in italics*):

(f)Unit 2 transmitters Trip units are calibrated at least once per 92 days 18 months. Unit 2 trip and Unit 3 level switches and transmitters are calibrated at the frequency identified in the table.

The proposed license amendment will also change nomenclature used to state the channel calibration frequency in Table 4.2.B-1 to be consistent with the nomenclature of Table 4.2.C-1 "ATWS-RPT Instrumentation Surveillance Requirements." The change is an editorial change only and will not affect the schedular surveillance requirements for the level transmitters and the associated analog trip units. The proposed amendment will change the notation under the channel calibration column for items 1.a, 2.a, 3.a, 3.e, and 4.a from Q<sup>(f)</sup> to E<sup>(f)</sup>.

## **DESCRIPTION and BASES of the CURRENT REQUIREMENT**

Table 4.2.B-1 "ECCS Actuation Instrumentation Surveillance Requirements" specifies the surveillance frequency requirements for the Reactor Vessel Water Level inputs to the Emergency Core Cooling System (ECCS). The Reactor Vessel Water Level instruments provide an input to the Core Spray (CS) System, Low Pressure Coolant Injection (LPCI) Subsystem, High Pressure Coolant Injection (HPCI), and Automatic Depressurization System (ADS). In Unit 2 the Reactor Vessel Water Level instruments are the existing Rosemount Differential Pressure transmitters used in the ATWS system, channels L-02-0263-23A, B, C, and D. In Unit 3 the Reactor Vessel Water Level instruments are Yarway Level Switches LIS-03-0263-72A, B, C, D and LITS-03-0263-59A, B.

Table 4.2.B-1 specifies a channel calibration frequency for the Reactor Vessel Water Level inputs to the ECCS systems. The table specifies a quarterly channel calibration surveillance for these inputs. Note (f) to Table 4.2.B-1 modifies the table entries by differentiating between the Unit 2 and Unit 3 instruments by referring to the Unit 2 instruments as a transmitter and associated trip units and to the Unit 3 instruments as level switches. Additionally, note (f) modifies the channel calibration frequency for the Unit 2 level transmitters by specifying an 18 month surveillance while retaining the frequency listed in the table for the trip units. The specified surveillance for the Unit 2 trip units is the same as for the Unit 3 level switches.

Table 4.2.B-1 lists the channel calibration frequency as Q and note (f) modifies this by stating the transmitters are calibrated once per 18 months. Table 4.2.C-1 lists the channel calibration frequency for the Reactor Vessel Water level instrumentation as E. Note (a) to the table modifies this by stating the trip units are to calibrated every 92 days.

## Description of the Need and Bases for Amending the Technical Specifications

The Unit 3 reactor vessel level switches are scheduled to be removed during the D3R14 outage in March of 1997. The reactor vessel level inputs to the ECCS system will be supplied by the existing Rosemout level transmitters currently used in the ATWS system and the trip functions will be supplied by additional trip units.

The proposed change to note (f) of Table 4.2.B-1 will remove reference to the Unit 3 level switches. The proposed change will require both the existing Unit 2 Rosemount transmitters and the post modification Unit 3 Rosemount transmitters to be calibrated at the frequency identified in the table (18 month intervals). The proposed change to note (f) will also require the existing Unit 2 trip units and the post modification Unit 3 trip units to be channel calibrated as modified by the note (at least once per 92 days). In summary, the change to the note will place the Unit 3 transmitters (LT-03-0263-23A, B, C, D) and the associated trip units on the same calibration schedule as the existing Unit 2 transmitters (LT-02-0263-23A, B, C, D) and associated trip units. This calibration frequency is consistent with the frequency stated in Table 4.2.C-1 note (a) where the transmitter is calibrated on an 18 month frequency and the associated trip units on a quarterly basis. The Reactor Vessel Water Level Low Low trips provide inputs to the Emergency Core Cooling System to actuate safety systems in the event of a design basis accident. The surveillance ensures instrumentation is available to provide trip signals. Calibration of the trip units will ensure a single failure will not prevent actuation of the safety system while preventing erroneous trips due to drift or malfunction.

Based on the above discussion, there is reasonable assurance that the proposed change to note (f) of Table 4.2.B-1 and the corresponding calibration schedule for LT-03-0263-23A, B, C, and D, at Dresden, will not endanger the public health and safety and that issuance of the proposed amendment will not be inimical to the common defense and security.

The change to the nomenclature of Table 4.2.B-1 is an editorial change to achieve consistency with the nomenclature of Table 4.2.C-1. The change to the nomenclature of Table 4.2.B-1 will not change the required frequency for performing channel calibration surveillance on the Reactor Vessel Water level transmitters and trip units of either the ECCS or ATWS systems.