ATTACHMENT B
Marked-Up Technical Specification Pages

LICENSE DPR-19/25

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3/4.2-18	3/4.2-18
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TABLE 4.2.B-1

ECCS ACTUATION INSTRUMENTATION
SURVEILLANCE REQUIREMENTS

Functional Unit	CHANNEL CHECK	CHANNEL FUNCTIONAL TEST	CHANNEL CALIBRATION	Applicable OPERATIONAL MODE(s)
1. CORE SPRAY (CS) SYSTEM				
a. Reactor Vessel Water Level - Low Low	S	M	E Ø[f]	1, 2, 3, 4[b], 5[b]
b. Drywell Pressure - High[d]	NA	M	Q	1, 2, 3
c. Reactor Vessel Pressure - Low (Permissive)	NA	M	Q	1, 2, 3, 4[b], 5[b]
d. CS Pump Discharge Flow - Low (Bypass)	NA	Q	E[e]	1, 2, 3, 4[b], 5[b]
2. LOW PRESSURE COOLANT INJECTION (LPCI) SUBSYSTEM				
a. Reactor Vessel Water Level - Low Low	S	M	E Ø[f]	1, 2, 3, 4[b], 5[b]
b. Drywell Pressure - High[d]	NA	M	Q	1, 2, 3
c. Reactor Vessel Pressure - Low (Permissive)	NA	M	Q	1, 2, 3, 4[b], 5[b]
d. LPCI Pump Discharge Flow - Low (Bypass)	NA	Q	E[e]	1, 2, 3, 4[b], 5[b]
3. HIGH PRESSURE COOLANT INJECTION (HPCI) SYSTEM[a]				
a. Reactor Vessel Water Level - Low Low	S	M	E Ø[f]	1, 2, 3
b. Drywell Pressure - High[d]	NA	M	Q	1, 2, 3
c. Condensate Storage Tank Level - Low	NA	M	NA	1, 2, 3
d. Suppression Chamber Water Level - High	NA	M	NA	1, 2, 3
e. Reactor Vessel Water Level - High (Trip)	NA	M	E Ø[f]	1, 2, 3
f. HPCI Pump Discharge Flow - Low (Bypass)	NA	Q	Q	1, 2, 3
g. Manual Initiation	NA	E	NA	1, 2, 3

TABLE 4.2.B-1 (Continued)

ECCS ACTUATION INSTRUMENTATION
SURVEILLANCE REQUIREMENTS

Functional Unit	CHANNEL CHECK	CHANNEL FUNCTIONAL TEST	CHANNEL CALIBRATION	Applicable OPERATIONAL MODE(s)
4. AUTOMATIC DEPRESSURIZATION SYSTEM[b]				
a. Reactor Vessel Water Level - Low Low	S	M	E Q[f]	1, 2, 3
b. Drywell Pressure - High[d]	NA	M	Q	1, 2, 3
c. Initiation Timer	NA	E	E	1, 2, 3
d. Low Low Level Timer	NA	E	E	1, 2, 3
e. CS Pump Discharge Pressure - High (Permissive)	NA	M	Q	1, 2, 3
f. LPCI Pump Discharge Pressure - High (Permissive)	NA	M	Q	1, 2, 3
5. LOSS OF POWER				
a. 4.16 kv Emergency Bus Undervoltage (Loss of Voltage)	NA	E	E	1, 2, 3, 4[c], 5[c]
b. 4.16 kv Emergency Bus Undervoltage (Degraded Voltage)	NA	E	E	1, 2, 3, 4[c], 5[c]

TABLE 4.2.B-1 (Continued)

ECCS ACTUATION INSTRUMENTATION SURVEILLANCE REQUIREMENTS

TABLE NOTATION

(a) Not required to be OPERABLE when reactor steam dome pressure is ≤150 psig.

(b) When the system is required to be OPERABLE per Specification 3.5.B.

(c) Required when the associated diesel generator is required to be OPERABLE per Specification 3.9.B.

(d) This function is not required to be OPERABLE when PRIMARY CONTAINMENT INTEGRITY is not required.

(e) Trip units are calibrated at least once per 92 days and transmitters are calibrated at the frequency identified in the table.

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

ATTACHMENT C

Significant Hazards Consideration

The Commission has provided standards for determining whether a no significant hazards consideration exists as stated in 10CFR50.92(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.

ComEd proposes to amend Appendix A, Technical Specifications note (f) of Table 4.2.B-1 "ECCS Actuation Instrumentation Surveillance Requirements" of Facility Operating Licenses DPR-19, DPR-25. The proposed amendment will remove reference to the Unit 3 Level switches thereby removing inference to a difference in ECCS Reactor Vessel Water Level instrumentation between Unit 2 and Unit 3. The proposed amendment will also change channel calibration column notation of Table 4.2.B-1 from Q to E for items 1.a, 2.a, 3.a, 3.e, and 4.a.

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 established in 10 CFR 50.92, operation of 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 to note (f) to Table 4.2.B-1, which modifies the surveillance frequency for the Reactor Vessel Water level Low Low inputs to the CS, LPCI, HPCI, and ADS systems (items 1.a, 2.a, 3.a, and 4.a) and the Reactor Vessel Water level High trip input to the HPCI system (item 3.c), will not increase the probability of or the consequences of any accident previously evaluated in the SAR. Similarly, the proposed editorial change to achieve consistency in notation between tables 4.2.B-1 and 4.2.C-1 will not increase the probability or consequences of any accident previously evaluated in the SAR.

The surveillance requirements proposed for the Unit 3 Reactor Vessel Water level transmitters are the same 18 month channel calibration requirements required by Table 4.2.C-1 "ATWS-RPT Instrument Surveillance Requirements." The surveillance schedule proposed for the new Unit 3 Reactor Vessel Water level analog trip units has the same quarterly requirement as the replaced Yarway level switches. The proposed change will impose a calibration schedule on the post modification trip units only, the trip setpoints of Table 3.2.B-1 "ECCS Actuation Instrumentation" will not change.

The proposed change affects the scheduling of the surveillance only and will not have any effect on the operating trip points of the instrumentation. The proposed change cannot initiate any of the accidents previously evaluated in the SAR. Based on this the proposed change to note (f) will not increase the probability of any accident nor the consequences of any accident previously evaluated in the SAR.

The change to the table to achieve consistency with Table 4.2.C-1 is an editorial change only. This editorial change will not increase the probability of an accident previously evaluated, nor will it increase the consequences of any accident previously evaluated.

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

The proposed change to note (f) provides a schedule for performing channel calibrations on the Reactor Vessel Water Level inputs to the ECCS System. The proposed change does not introduce any new failure mechanisms or modes. The proposed change will not create the possibility of a new or different type of accident previously evaluated.

The change to the table is an editorial change only and will not create the possibility of a new or different type of accident previously evaluated.

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

The proposed amendment only specifies a schedule for performing channel calibrations for the Reactor Vessel Water level instrumentation. The change will not impact the availability or trip setpoints of the ECCS system. Further the editorial change to achieve consistency between tables will not impact the availability or operating setpoints of the instruments. Therefore, the proposed changes do not involve a significant reduction in the margin of safety.

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, a 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 and do not involve a significant increase in the amounts, and no significant changes in the types, of any effluents that may be released off-site. Additionally, this request does not involve a significant increase in individual or cumulative occupational radiation exposure.