

**ATTACHMENT B**  
**Marked-Up Technical Specification Pages**

**LICENSE DPR-19/25**

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3.9 - LIMITING CONDITIONS FOR OPERATION

## C. D.C. Sources - Operating

As a minimum, the following D.C. electrical power sources shall be OPERABLE with the identified parameters within the limits specified in Table 4.9.C-1:

1. Two station 250 volt batteries, each with a full capacity charger.
2. Two station 125 volt batteries, each with a full capacity charger.
3. Two unit 24/48 volt batteries, each with a full capacity charger.

APPLICABILITY:

OPERATIONAL MODE(s) 1, 2, and 3.

ACTION:

1. With one of the ~~above required 24/48 volt or~~ 250 volt station batteries and/or chargers inoperable, restore the inoperable equipment to OPERABLE status within 2 hours<sup>(b)</sup>.

4.9 - SURVEILLANCE REQUIREMENTS

## C. D.C. Sources - Operating

Each of the required ~~24/48 volt~~, 125 volt and 250 volt batteries and chargers shall be demonstrated OPERABLE<sup>(a)</sup>:

1. At least once per 7 days by verifying that:
  - a. The parameters in Table 4.9.C-1 meet Category A limits, and
  - b. There is correct breaker alignment to the battery chargers and total battery terminal voltage is  $\geq 26.0$ ,  $\geq 125.9$ , or  $\geq 260.4$  volts, as applicable, on float charge.
2. At least once per 92 days and within 7 days after a battery discharge with a battery terminal voltage below  $21.7$ , 105 or 210 volts, as applicable, or battery overcharge with battery terminal voltage above  $30$ , 150 or 300 volts, as applicable, by verifying that:
  - a. The parameters in Table 4.9.C-1 meet the Category B limits,
  - b. There is no visible corrosion at either terminals or connectors, or the connection resistance of these items is  $\leq 150 \times 10^{-6}$  ohms or  $\leq 20\%$  above baseline connection resistance, whichever is higher, and

- a. An alternate 125 volt battery shall adhere to these same Surveillance Requirements to be considered OPERABLE, except the Unit 2 total battery terminal voltage on float charge shall be verified weekly as  $\geq 130.2$  volts.
- b. Each 250 volt battery may be inoperable for a maximum of seven days per operating cycle for maintenance or testing. If it is determined that a 250 volt battery need be replaced as a result of maintenance or testing, a specific battery may be inoperable for an additional seven days per operating cycle.

3.9 - LIMITING CONDITIONS FOR OPERATION

D. D.C. Sources - Shutdown

As a minimum, the following D.C. electrical power sources shall be OPERABLE:

1. One station 250 volt battery with a full capacity charger.
2. One station 125 volt battery with a full capacity charger.
3. One unit 24/48 volt battery with a full capacity charger.

APPLICABILITY:

OPERATIONAL MODE(s) 4 and 5, and when handling irradiated fuel in the secondary containment.

ACTION:

With any of the above required station batteries and/or associated charger(s) inoperable, suspend CORE ALTERATIONS, suspend handling of irradiated fuel in the secondary containment, and suspend operations with a potential for draining the reactor vessel.

4.9 - SURVEILLANCE REQUIREMENTS

D. D.C. Sources - Shutdown

The required batteries and chargers shall be demonstrated OPERABLE<sup>(a)</sup> per the surveillance requirements in Specification 4.9.C.

a An alternate 125 volt battery shall adhere to these same Surveillance Requirements to be considered OPERABLE, except the Unit 2 total battery terminal voltage on float charge shall be verified weekly as  $\geq 130.2$  volts.

3.9 - LIMITING CONDITIONS FOR OPERATION

4.9 - SURVEILLANCE REQUIREMENTS

4. For Unit 3, 125 volt D.C. power distribution, consisting of:
  - a. TB Main Bus Nos. 2A-1, 3A and 3A-1,
  - b. TB Res. Bus Nos. 3B and 3B-1, and
  - c. RB Distribution Panel No. 3.
5. 24/48 volt D.C. power distribution, consisting of:
  - a. For Unit 2, Bus Nos. 2A and 2B.
  - b. For Unit 3, Bus Nos. 3A and 3B.

*Deleted.*

APPLICABILITY:

OPERATIONAL MODE(s) 1, 2, and 3.

ACTIONS:

1. With one of the above required A.C. distribution systems not energized, re-energize the system within 8 hours or be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.
2. With one of the above required D.C. distribution systems not energized, re-energize the system within 2 hours or be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.

3.9 - LIMITING CONDITIONS FOR OPERATION

4.9 - SURVEILLANCE REQUIREMENTS

4. For 24/48 volt D.C. distribution, either

a. Bus Nos. 2A and 2B, or

b. Bus Nos. 3A and 3B.

*Deleted.*

APPLICABILITY:

OPERATIONAL MODE(s) 4, 5, and when handling irradiated fuel in the secondary containment.

ACTIONS:

With less than the above required A.C. or D.C. distribution systems energized, suspend CORE ALTERATIONS, suspend handling of irradiated fuel in the secondary containment, and suspend operations with a potential for draining the reactor vessel.

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 3/4.9.C, "D. C. Sources - Operating", 3/4.9.D "D. C. Sources - Shutdown", 3/4.9.E "Distribution - Operating", and 3/4.9.F "Distribution - Shutdown" of Facility Operating Licenses DPR-19, DPR-25. The amendment request removes the 24/48 volt batteries, chargers, and distribution system from the above mentioned Technical Specifications.

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:**

Removal of the 24/48 Vdc batteries, chargers, and distribution panels from the Technical Specification requirements of 3/4.9.C, 3/4.9.D, 3/4.9.E, and 3/4.9.F and the subsequent relocation of those requirements to licensee administrative control is an administrative change that will still ensure the availability of the 24/48 Vdc system and will not increase the probability of accidents previously evaluated. Relocation of the 24/48 Vdc requirements to administrative controls will have no effect on the control instrumentation and cannot act as an initiator for any of the accidents evaluated in the UFSAR.

Similarly, relocation of the 24/48 Vdc system requirements to licensee administrative control will have no effect on the availability of the loads which are supplied by the 24/48 Vdc batteries nor on any of the consequences of accidents previously evaluated in the UFSAR. Control of the 24/48 Vdc requirements by station administrative controls under 10CFR50.59 will not affect any of the protection or mitigation functions which may be provided by any of the loads supplied by the batteries. Operation under the proposed amendment will not significantly increase the probability or consequences of any accidents previously evaluated.

Because of the above evaluation, removal of the 24/48 Vdc system from the Technical Specifications will not involve a significant increase in the probability or consequences of an accident previously evaluated.

ATTACHMENT C  
SIGNIFICANT HAZARDS CONSIDERATION

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

The 24/48 Vdc batteries, chargers, and other components will retain the separation, and redundancy under which they are presently installed. No new failure modes are introduced by this administrative relocation of requirements, for the 24/48 Vdc system, from the Technical Specifications to licensee administrative control. The possibility of a new or different accident from any accident previously evaluated is not increased or created by this administrative change.

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

Relocation of the TS requirements for the 24/48 Vdc system does not affect the operating points or setpoints of any systems or components. Plant operating points or parameters are not changed by this proposed relocation of requirements in this amendment request. The safety related equipment that is supported by the 24/48 Vdc system will continue to be required in the existing modes of applicability as determined by the individual equipment Technical Specifications. Thus operation under the proposed license amendment removes some redundancy and constraints during refueling but does not significantly reduce 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.

ATTACHMENT C  
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.