ATTACHMENT B

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TABLE 2.2.A-1

REACTOR PROTECTION SYSTEM INSTRUMENTATION SETPOINTS

Functional Unit	Trip Setpoint
1. Intermediate Range Monitor:	
a. Neutron Flux - High	≤120/125 divisions of full scale
b. Inoperative	NA
2. Average Power Range Monitor:	
a. Setdown Neutron Flux - High	≤15% of RATED THERMAL POWER
b. Flow Biased Neutron Flux - High	
1) Dual Recirculation Loop Operation	
a) Flow Biased	≤0.58W[a] + 62%, with a maximum of
b) High Flow Maximum	≤120% of RATED THERMAL POWER
2) Single Recirculation Loop Operation	
a) Flow Biased	≤0.58W[a] + 58.5%, with a maximum of
b) High Flow Maximum	≤116.5% of RATED THERMAL POWER
c. Fixed Neutron Flux - High	≤120% of RATED THERMAL POWER
d. Inoperative	NA
3. Reactor Vessel Steam Dome Pressure - High	≤1060 psig
4. Reactor Vessel Water Level - Low	≥144 inches above top of active fuel
5. Main Steam Line Isolation Valve - Closure	≤10% closed
~~6. Main Steam Line Radiation - High~~ Deleted	~~≤3[b] x normal full power background (without hydrogen addition)~~

a W shall be the recirculation loop flow expressed as a percentage of the recirculation loop flow which produces a rated core flow of 98 million lbs/hr.

~~b With Unit 2 operating above 20% RATED THERMAL POWER and hydrogen being injected into the primary coolant, this Unit 2 setting may be increased to "≤3 x full power background (with hydrogen addition)".~~

decrease as power is increased to 100% in comparison to the level outside the shroud, to a maximum of seven inches, due to the pressure drop across the steam dryer. Therefore, at 100% power, an indicated water level of +8 inches water level may be as low as +1 inches inside the shroud which corresponds to 144 inches above the top of active fuel and 504 inches above vessel zero.

5. Main Steam Line Isolation Valve - Closure

Automatic isolation of the main steam lines is provided to give protection against rapid reactor depressurization and cooldown of the vessel. When the main steam line isolation valves begin to close, a scram signal provides for reactor shutdown so that high power operation at low reactor pressures does not occur. With the scram setting at 10% valve closure (from full open), there is no appreciable increase in neutron flux during normal or inadvertent isolation valve closure, thus providing protection for the fuel cladding integrity Safety Limit. Operation of the reactor at pressures lower than the MSIV closure setting requires the reactor mode switch to be in the Startup/Hot Standby position, where protection of the fuel cladding integrity Safety Limit is provided by the IRM and APRM high neutron flux scram signals. Thus, the combination of main steam line low pressure isolation and the isolation valve closure scram with the mode switch in the Run position assures the availability of the neutron flux scram protection over the entire range of applicability of fuel cladding integrity Safety Limit.

6. ~~Main Steam Line Radiation - High~~ Deleted

~~High radiation levels in the main steam line tunnel above that due to the normal nitrogen and oxygen radioactivity are an indication of leaking fuel. When high radiation is detected, a scram is initiated to mitigate the failure of fuel cladding. The scram setting is high enough above background radiation levels to prevent spurious scrams yet low enough to promptly detect gross failures in the fuel cladding. This setting is determined based on normal full power background (NFPB) radiation levels without hydrogen addition. With the injection of hydrogen into the feedwater for mitigation of intergranular stress corrosion cracking, the full power background levels may be significantly increased. The setting is increased based on the new background levels to allow for the injection of hydrogen. This trip function provides an anticipatory scram to limit offsite dose consequences, but is not assumed to occur in the analysis of any design basis event.~~

TABLE 3.1.A-1 (Continued)

REACTOR PROTECTION SYSTEM INSTRUMENTATION

Functional Unit	Applicable OPERATIONAL MODE(s)	Minimum OPERABLE CHANNEL(s) per TRIP SYSTEM[a]	ACTION
5. Main Steam Line Isolation Valve - Closure	1, 2[j]	4	10
6. ~~Main Steam Line Radiation - High~~ Deleted	~~1, 2[j]~~	~~2~~	~~15~~
7. Drywell Pressure - High	1, 2[h]	2	11
8. Scram Discharge Volume Water Level - High			
a. ΔP Switch, and	1, 2	2	11
	5[b,i]	2	13
b. Thermal Switch (Unit 2), or Float Switch (Unit 3)	1, 2	2	11
	5[b,i]	2	13
9. Turbine Stop Valve - Closure	1[d]	4	16
10. Turbine EHC Control Oil Pressure - Low	1[d]	2	16
11. Turbine Control Valve Fast Closure	1[d]	2	16
12. Turbine Condenser Vacuum - Low	1, 2[j]	2	10

TABLE 3.1.A-1 (Continued)

REACTOR PROTECTION SYSTEM INSTRUMENTATION

ACTION

ACTION 10 - Be in at least STARTUP with reactor pressure less than 600 psig within 8 hours.

ACTION 11 - Be in at least HOT SHUTDOWN within 12 hours.

ACTION 12 - Verify all insertable control rods to be fully inserted in the core and lock the reactor mode switch in the Shutdown position within one hour.

ACTION 13 - Suspend all operations involving CORE ALTERATIONS, and fully insert all insertable control rods within one hour. If SRM instrumentation is not OPERABLE per Specification 3.10.B, also suspend replacement of LPRMs.

ACTION 14 - Be in at least STARTUP within 8 hours.

ACTION 15 - Deleted ~~Be in STARTUP with the main steam line isolation valves closed within 8 hours or in at least HOT SHUTDOWN within 12 hours.~~

ACTION 16 - Initiate a reduction in THERMAL POWER within 15 minutes and reduce reactor power to less than 45% of RATED THERMAL POWER within 2 hours.

ACTION 17 - Verify all insertable control rods to be fully inserted in the core within one hour.

ACTION 18 - Lock the reactor mode switch in the Shutdown position within one hour.

ACTION 19 - Suspend all operations involving CORE ALTERATIONS, and fully insert all insertable control rods and lock the reactor mode switch in the Shutdown position within one hour. If SRM instrumentation is not OPERABLE per Specification 3.10.B, also suspend replacement of LPRMs.

TABLE 4.1.A-1

REACTOR PROTECTION SYSTEM INSTRUMENTATION SURVEILLANCE REQUIREMENTS

Functional Unit	Applicable OPERATIONAL MODES	CHANNEL CHECK	CHANNEL FUNCTIONAL TEST	CHANNEL[a] CALIBRATION
1. Intermediate Range Monitor:				
a. Neutron Flux - High	2 3, 4, 5	S[b] S	S/U[c], W[o] W[o]	E[o] E[o]
b. Inoperative	2, 3, 4, 5	NA	W[o]	NA
2. Average Power Range Monitor[l]:				
a. Setdown Neutron Flux - High	2 3, 5[m]	S[b] S	S/U[c], W[o] W[o]	SA[o] SA[o]
b. Flow Biased Neutron Flux - High	1	S, D	W	W[d,e], SA
c. Fixed Neutron Flux - High	1	S	W	W[d], SA
d. Inoperative	1, 2, 3, 5[m]	NA	W	NA
3. Reactor Vessel Steam Dome Pressure - High	1, 2[i]	NA	M	Q
4. Reactor Vessel Water Level - Low	1, 2	D	M	E[h]
5. Main Steam Line Isolation Valve - Closure	1, 2[p]	NA	M	E
6. Deleted				
~~6. Main Steam Line Radiation - High~~	~~1, 2[j]~~	~~S~~	~~M~~	~~E[g]~~
7. Drywell Pressure - High	1, 2[n]	NA	M	Q

TABLE 4.1.A-1 (Continued)

REACTOR PROTECTION SYSTEM INSTRUMENTATION SURVEILLANCE REQUIREMENTS

(l) This function not required to be OPERABLE when THERMAL POWER is less than 45% of RATED THERMAL POWER.

(m) Required to be OPERABLE only prior to and during required SHUTDOWN MARGIN demonstrations performed per Specification 3.12.B.

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

(o) The provisions of Specification 4.0.D are not applicable to the CHANNEL FUNCTIONAL TEST and CHANNEL CALIBRATION surveillances for a period of 24 hours after entering OPERATIONAL MODE 2 or 3 when shutting down from OPERATIONAL MODE 1.

(p) This function is not required to be OPERABLE when reactor pressure is less than 600 psig.

(q) Deleted ~~A current source provides an instrument channel alignment every 3 months~~.

TABLE 3.2.A-1

ISOLATION ACTUATION INSTRUMENTATION

Functional Unit	Trip Setpoint[i]	Minimum CHANNEL(s) per TRIP SYSTEM[e]	Applicable OPERATIONAL MODE(s)	ACTION
1. PRIMARY CONTAINMENT ISOLATION				
a. Reactor Vessel Water Level - Low	≥144 inches	2	1, 2, 3	20
b. Drywell Pressure - High[d]	≤2 psig	2	1, 2, 3	20
c. Drywell Radiation - High	≤100 R/hr	1	1, 2, 3	23
2. SECONDARY CONTAINMENT ISOLATION				
a. Reactor Vessel Water Level - Low[c]	≥144 inches	2	1, 2, 3 & *	24
b. Drywell Pressure - High[c,d]	≤2 psig	2	1, 2, 3	24
c. Reactor Building Ventilation Exhaust Radiation - High[c]	≤10 mR/hr	2	1, 2, 3 & * *	24
d. Refueling Floor Radiation - High[c]	≤100 mR/hr	2	1, 2, 3 & * *	24
3. MAIN STEAM LINE (MSL) ISOLATION				
a. Reactor Vessel Water Level - Low Low	≥84 inches	2	1, 2, 3	21
~~b. MSL Tunnel Radiation - High[b]~~ Deleted.	~~≤3[g] x normal background~~	~~2~~	~~1, 2, 3~~	~~21~~
c. MSL Pressure - Low	≥825 psig	2	1	22
d. MSL Flow - High	≤120% of rated	2/line	1, 2, 3	21
e. MSL Tunnel Temperature - High	≤200°F	2 of 4 in each of 2 sets	1, 2, 3	21

TABLE 3.2.A-1 (Continued)

ISOLATION ACTUATION INSTRUMENTATION

TABLE NOTATION

* During CORE ALTERATIONS or operations with a potential for draining the reactor vessel.

** When handling irradiated fuel in the secondary containment.

(a) A CHANNEL may be placed in an inoperable status for up to 2 hours for required surveillance without placing the CHANNEL in the tripped condition provided the Functional Unit maintains isolation actuation capability.

(b) ~~Also trips the mechanical vacuum pump and isolates the steam jet air ejectors~~. Deleted

(c) Isolates the reactor building ventilation system and actuates the standby gas treatment system.

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

(e) Only one TRIP SYSTEM.

(f) Closes only reactor water cleanup system isolation valves.

Deleted

(g) ~~Normal background~~ is as measured during full power operation without hydrogen being injected. With Unit 2 ~~operating above 20% RATED THERMAL POWER~~ and hydrogen being injected into the feedwater, this Unit 2 setting may be as measured ~~during full power operation~~ with hydrogen being injected.

(h) Includes a time delay of $3 \leq t \leq 9$ seconds.

(i) Reactor vessel water level settings are expressed in inches above the top of active fuel (which is 360 inches above vessel zero).

(j) All four switches in either of 2 groups for each trip system.

TABLE 4.2.A-1

ISOLATION ACTUATION INSTRUMENTATION SURVEILLANCE REQUIREMENTS

Functional Unit	CHANNEL CHECK	CHANNEL FUNCTIONAL TEST	CHANNEL CALIBRATION	Applicable OPERATIONAL MODE(s)
1. PRIMARY CONTAINMENT ISOLATION				
a. Reactor Vessel Water Level - Low	S	M	E[a]	1, 2, 3
b. Drywell Pressure - High[b]	NA	M	Q	1, 2, 3
c. Drywell Radiation - High	S	M	E	1, 2, 3
2. SECONDARY CONTAINMENT ISOLATION				
a. Reactor Vessel Water Level - Low[c]	S	M	E[a]	1, 2, 3 & *
b. Drywell Pressure - High[b,c]	NA	M	Q	1, 2, 3
c. Reactor Building Ventilation Exhaust Radiation - High[c]	S	M	Q	1, 2, 3 & * *
d. Refueling Floor Radiation - High[c]	S	M	Q	1, 2, 3 & * *
3. MAIN STEAM LINE (MSL) ISOLATION				
a. Reactor Vessel Water Level - Low Low	S	M	E[a]	1, 2, 3
~~b. MSL Tunnel Radiation - High~~ Deleted	~~S~~	~~M~~	~~E[d]~~	~~1, 2, 3~~
c. MSL Pressure - Low	NA	M	Q	1
d. MSL Flow - High	S	M	E	1, 2, 3
e. MSL Tunnel Temperature - High	NA	E	E	1, 2, 3

TABLE 4.2.A-1 (Continued)

ISOLATION ACTUATION INSTRUMENTATION
SURVEILLANCE REQUIREMENTS

TABLE NOTATION

* During CORE ALTERATIONS or operations with a potential for draining the reactor vessel.

** When handling irradiated fuel in the secondary containment.

(a) Trip units are calibrated at least once per 31 days and transmitters are calibrated at the frequency identified in the table.

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

(c) Isolates the reactor building ventilation system and actuates the standby gas treatment system.

(d) Deleted ~~These instrument channels will be calibrated using simulated electrical signals once every three months. In addition, calibration including the sensors will be performed every 18 months.~~

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 Tables 2.2.A - 1 "Reactor Protection System Instrumentation Setpoints", 3.1.A - 1 "Reactor Protection System Instrumentation", 4.1.A - 1 Reactor Protection System Instrumentation Surveillance Requirements", Table 3.2.A - 1 "Isolation Actuation Instrumentation", Table 4.2.A - 1 "Isolation Actuation Instrumentation Surveillance Requirements", and the Limiting Systems Settings Bases. The proposed changes will remove Item 6 "Main Steam Line Radiation - High" from each of TS Tables 2.2.A - 1, 3.1.A - 1, and 4.1.A - 1. The change will remove Item 3b " MSL Tunnel Radiation - High" from each of Tables 3.2.A - 1 and 4.2.A - 1. The proposed change will remove Item 6 "Main Steam Line - Radiation - High", from the Limiting Safety System Settings Bases. The proposed amendment will remove from the above listed tables the scram and scram functions of the Main Steam Lines Radiation Monitors.

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:**

   This amendment request proposes to remove the existing MSLRM scram and the MSLRM MSL Valve closure signal. The purpose of the MSLRM High scram and the MSL Valve closure signal is to mitigate the radiological effects of a fuel element failure. These functions do not serve as initiators for any of the accidents evaluated in chapter 15 of the UFSAR. Removal of these functions will not increase the probability of any of the accidents previously evaluated.

The radiological effects of a CRDA have been evaluated by the BWROG in their Safety Analysis Report NEDO - 31400. The BWROG report was evaluated by the NRC and found acceptable by letter dated May 15, 1991. The NRC Safety Evaluation Report accepting the BWROG analysis required licensees to demonstrate that the assumptions of the BWROG analysis were bounding on their plants. ComEd's Dresden Station has evaluated the BWROG analysis for applicability on Dresden Units 2 and 3.

The BWROG analysis demonstrates that operation of Units 2 and 3 with the proposed amendment does not represent a significant increase in the consequences of a CRDA.

Therefore, operation of Dresden Units 2 and 3 under the proposed amendment does not represent 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 because:**

This amendment request proposes to remove the existing MSLRM High scram and the MSL Valve closure input from the MSL Tunnel Radiation High signal. Removal of these functions does not represent a change in operating parameters for Dresden Units 2 and 3. Removal of these functions does not add any additional hardware and does not represent any new failure modes. Operation of Dresden Units 2 and 3 under the proposed amendment does 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 requested amendment proposes to eliminate the MSLRM High scram and the MSL Valve Closure input from the MSL Tunnel Radiation High signal. Operation under the proposed amendment will not change any plant operation parameters, nor any protective system setpoints other than removal of these functions. The BWROG Safety Analysis Report has demonstrated that the consequences of the CRDA without the MSLRM High scram and MSL Valve Closure signal from the MSL Tunnel Radiation monitor does not result in doses which are not well within guidelines of 10 CFR part 100 limits. Therefore, the proposed changes do not involve a significant reduction in the margin of safety.

ATTACHMENT C
Significant Hazards Consideration

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.