

**ATTACHMENT B**  
**Marked-Up and Re-typed Technical Specification Pages**

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INSTRUMENTATION

Isolation Actuation 3/4.2.A

TABLE 3.2.A-1 (Continued)  
ISOLATION ACTUATION INSTRUMENTATION

Functional Unit	Trip Setpoint <sup>(1)</sup>	Minimum CHANNEL(s) per TRIP SYSTEM <sup>(2)</sup>	Applicable OPERATIONAL MODE(s)	ACTION
<b>4. REACTOR WATER CLEANUP SYSTEM ISOLATION</b>				
a. Standby Liquid Control System Initiation <sup>(1)</sup>	NA	NA	1, 2, 3	23
b. Reactor Vessel Water Level - Low	≥144 inches	2	1, 2, 3	23
<b>5. ISOLATION CONDENSER ISOLATION</b>				
a. Steam Flow - High	≤300% of rated steam flow	1	1, 2, 3	23
b. Return Flow - High	≤32 (Unit 2)/ ≤14.8 (Unit 3) inches water diff.	1	1, 2, 3	23
<b>6. HIGH PRESSURE COOLANT INJECTION ISOLATION</b>				
a. Steam Flow - High	≤300% of rated steam flow <sup>(1)</sup>	1	1, 2, 3	23
b. Reactor Vessel Pressure - Low	>100 → >200 psig	2	1, 2, 3	23
c. Area Temperature - High	≤200 °F	4 <sup>(3)</sup>	1, 2, 3	23

DRESDEN - UNITS 2 & 3

3/4.2.4

Amendment Nos.

150.475

INSTRUMENTATION  
  
Isolation Actuation 3/4.2.A

**TABLE 3.2.A-1 (Continued)**  
**ISOLATION ACTUATION INSTRUMENTATION**

Functional Unit	Trip Setpoint <sup>(d)</sup>	Minimum CHANNEL(s) per TRIP SYSTEM <sup>(d)</sup>	Applicable OPERATIONAL MODE(s)	ACTION
<b>4. REACTOR WATER CLEANUP SYSTEM ISOLATION</b>				
a. Standby Liquid Control System Initiation <sup>(f)</sup>	NA	NA	1, 2, 3	23
b. Reactor Vessel Water Level - Low	≥ 144 inches	2	1, 2, 3	23
<b>5. ISOLATION CONDENSER ISOLATION</b>				
a. Steam Flow - High	≤ 300% of rated steam flow	1	1, 2, 3	23
b. Return Flow - High	≤ 32 (Unit 2)/ ≤ 14.8 (Unit 3) inches water diff.	1	1, 2, 3	23
<b>6. HIGH PRESSURE COOLANT INJECTION ISOLATION</b>				
a. Steam Flow - High	≤ 300% of rated steam flow <sup>(h)</sup>	1	1, 2, 3	23
b. Reactor Vessel Pressure - Low	≥ 100 psig	2	1, 2, 3	23
c. Area Temperature - High	≤ 200°F	4 <sup>(i)</sup>	1, 2, 3	23

DRESDEN - UNITS 2 & 3  
  
3/4.2.4  
  
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**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 3/4.2.A of Facility Operating Licenses DPR-19 and DPR-25. The amendment request changes current requirements for Technical Specification (TS) 3.2.A, Table 3.2.A-1, Isolation Actuation Instrumentation, item 6.b, High Pressure Coolant Injection Isolation, Reactor Vessel Pressure - Low, increasing the setpoint from greater than or equal to 80 psig to greater than or equal to 100 psig.

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 Low Reactor Pressure isolation of the HPCI steam supply lines is provided to prevent damage to the HPCI turbine when the reactor steam pressure has decreased below that required to provide adequate motive force to operate the system. The steam supply isolation low reactor pressure setpoint is not an assumed initiator or contributor to any previously evaluated accident and therefore this change does not involve an increase in the probability of an accident previously evaluated at Dresden Station.

The Low Reactor Pressure isolation of the HPCI steam supply lines is described in the plant safety analysis as a backup protection to other system and facility design features which provide assurance that accident transients will not result in failures of the system which contribute significantly to the consequences of the initiating accident. The low reactor pressure isolation signal provides backup to other isolation signals to ensure isolation will occur, minimizing the radiation dose as a result of steam leakage past the turbine seals in the event of a locked rotor due to damage from liquid carryover due to postulated swell in the reactor vessel.

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**Significant Hazards Consideration**

These analyses assume the isolation function occurs at 100 psig, and the proposed setpoint of greater than or equal to 100 psig is consistent and conservative with respect to these assumptions. Because the isolation function is not an accident initiator and the revised setpoint ensures that the isolation function continues to minimize radiological consequences, the consequences of any accident previously evaluated is not increased by the proposed changes.

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

The proposed change administratively increases the Low Reactor Vessel Pressure trip setpoint which initiates HPCI isolation. This change does not result in any new or different modes of operation. The proposed change increases the setpoint at which the HPCI turbine steam supply will be isolated as the reactor vessel pressure decreases following a postulated accident. The proposed new setpoint is conservative with respect to the existing TS limit, i.e. the new limit of greater than or equal to 100 psig is consistent and permitted by the existing limit of greater than or equal to 80 psig. The change assures that the Trip Setpoint in the TS accurately reflects the design basis and UFSAR described limits.

Because the proposed change does not result in any new modes of plant operation and administratively increases the system isolation setpoint in a conservative manner, the proposed change does not create the possibility of a new or different kind of accident from those previously evaluated.

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

The Trip Setpoint provides assurance that the HPCI turbine cannot be operated with a steam supply pressure too low to drive the turbine and pump. The isolation assures that the turbine does not stall and minimizes the potential for the release of radioactivity which results from steam leakage past the turbine seals. The proposed change increases the setpoint, ensuring that the required isolation occurs at a higher pressure which is more conservative, i.e. it assures the turbine is isolated before the inlet steam pressure falls to the stall pressure of the HPCI turbine and leakage occurs. The greater than or equal to 100 psig limit is well below the range of reactor vessel pressure for which HPCI is required to perform its safety function. Therefore, the margin of safety provided by the function of the HPCI isolation on low reactor vessel pressure is increased by the proposed TS change, and this change will not involve a reduction in the margin of safety.

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**Significant Hazards Consideration**

As described, the proposed amendment for Dresden will not reduce the availability of systems required to mitigate accident conditions. Neither are new or significantly different modes of operation proposed. Therefore, the proposed change does 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.