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Dresden Generating Station
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April 3, 1997

JSPLTR 97-0067

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

SUBJECT: Dresden Nuclear Power Station Units 2 and 3
Supplement to Request for Amendment to Facility Operating Licenses
DPR-19 and DPR-25, Appendix A, Technical Specifications (TS),
**Supplement to Changes to Technical Specification 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."**
NRC Docket Nos. 50-237 and 50-249

Reference: a) Letter JSPLTR 97-0036 dated February 19, 1997, from J. Stephen
Perry, ComEd, to U.S. Nuclear Regulatory Commission, Request for
Amendment to Facility Operating Licenses DPR-19 and DPR-25,
Appendix A, Technical Specifications (TS),
**Changes to Technical Specification 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."**

The Reference letter proposed 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 and DPR-25. The original proposal requested an entire relocation of the
Technical Specification provisions for the 24/48 Vdc batteries, chargers, and distribution
systems from Technical Specifications to licensee administrative control.

The primary basis for the Reference a) proposal was to relocate from the TS redundant
requirements for the 24/48 volt batteries after facility changes to the Unit 3 24/48 volt
battery system. A secondary benefit for the original amendment request was to preclude
the requirement for a redundant amendment request in the future to support a similar
facility change to Unit 2A, 24/48 volt battery. However, safety related loads will remain
on the Unit 2, 2A 24/48 volt battery until facility changes can be made during the next
Unit 2 refueling outage, D2R15, currently scheduled in 1998. The NRC Staff's review of
Reference a) resulted in the determination that relocation of the Unit 3 TS provisions was

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acceptable. However, due to the number of safety related loads and systems affected by the Unit 2A 24/48 volt battery, the Staff recommendation that provisions for the Unit 2A battery remain in the TS until the safety related loads on the Unit 2A battery are no longer required (after fuel offload). ComEd concurs with the Staff in the proposed changes herein would have greater consistency with the Staff's recent policy on relocated Technical Specification provisions.

ComEd has reviewed the Staff's recommendation and has proposed the following revised Technical Specification pages:

Page 3/4.9-12

LCO 3.9.C.3

Originally proposed: Delete LCO 3.9.C.3 in its entirety.

Revised proposal: Retain LCO 3.9.C.3 in its entirety and add Footnote (d) to LCO 3.9.C.3 to read :

“Applicable to Unit 2 only”

Surveillance Requirement 4.9.C.1.b

Originally Proposed: Deletion of terminal voltage requirement of “ ≥ 26.0 .”

Revised proposal: Addition of Footnote (d) to terminal voltage requirement “ ≥ 26.0 .”

Surveillance Requirement 4.9.C.2

Originally proposed : Deletion of terminal voltages of 21.7 and 30.

Revised proposal: Addition of Footnote (d) to terminal voltages “21.7” and “30.”

Page 3/4-16

LCO 3.9.D.3

Originally proposed: Delete LCO 3.9.D.3 in its entirety.

Revised proposal: Retention of LCO 3.9.D.3 and addition of Footnote (b) to LCO 3.9.D.3 and revise “One Unit” to “the Unit 2A”

Page 3/4.9-18

Originally proposed: Delete LCO 3.9.E.5 in its entirety.

Revised proposal: Deletion of 3.9.E.5.b. Deletion of "a. For Unit 2,"
The addition of footnote (a) which reads: "Applicable to Unit 2 only"

Page 3/4.9-20

Originally proposed: Delete LCO 3.9.F.4 in its entirety.

Revised proposal: Deletion of 3.9.F.4.b. Deletion of "either: a." and the
addition of footnote (a) which reads: "Applicable to Unit 2 only"

ComEd has reviewed the evaluation of No Significant Hazards Consideration provided in Reference a) and has determined that the previous determination of no significant hazards is applicable to this supplementary amendment request for the Unit 3 24/48 volt battery provisions. The Unit 2 provisions have been retained in the TS for DC systems Operating, but are modified slightly for LCO 3.9.F.4 for DC Systems - Shutdown and DC Distribution Shutdown, respectively.

LCO 3.9.D.3 for DC Systems - Shutdown is proposed to be modified to require the Unit 2A battery only and not either battery during Mode 4, Mode 5 and when handling irradiated fuel in the secondary containment due to the loads (as indicated in Reference a) existing on the 2A battery. As also stated in the Reference letter, loads on Bus 2B will fail in a conservative direction and will be annunciated in the main control room upon loss of the 2B battery or bus, and are not required for safe shutdown. Therefore, ComEd proposes to relocate the TS provisions for 24/48 volt 2B battery and bus for Modes 4 and 5 and when handling irradiated fuel in the secondary containment where applicable to licensee administrative control. Accordingly, ComEd considers relocation of the Unit 2B battery and bus provisions equivalent to relocation of the Unit 3 battery and bus provisions, and consistent with the Staff's policy for such relocations. LCO 3.9.F.4 has been modified accordingly to require the 2A Bus only. As such, the Reference a) finding of no significant hazards envelopes the proposed changes to the DC Systems - Shutdown and DC Distribution - Shutdown TS.

Footnotes (d), (b), (a), and (a) have been added to the TS Pages 3/4.9-12, 16, 18, and 20, respectively, to provide clarity that the 24/48 battery requirements are retained in the TS applicable to Unit 2 only.

ComEd is providing in Attachment A the revised marked-up Technical Specification pages and in Attachment B the revised, re-typed Technical Specification pages.


This proposed supplementary Technical Specification amendment has been reviewed and approved by ComEd On-Site and Off-Site Review in accordance with ComEd procedures.

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.

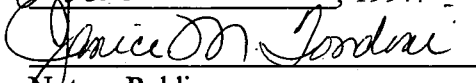
Please direct any questions you may have concerning this submittal to this office.

Sincerely,


J. M. Heffley
Station Manager
Dresden Station

Subscribed and Sworn to before me

on this 3rd day of
April 1997.


Notary Public



Attachments:

- A. Marked-Up Technical Specification Pages
- B. Revised Technical Specification Pages

cc: A. Bill Beach, Regional Administrator - RIII
Senior Resident Inspector - Dresden
J. F. Stang, Project Manager - NRR
Office of Nuclear Facility Safety - IDNS