3.7 - LIMITING CONDITIONS FOR OPERATION

P. Standby Gas Treatment System

Two independent standby gas treatment subsystems shall be OPERABLE.

APPLICABILITY:

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

ACTION:

1. With one standby gas treatment subsystem inoperable, restore the inoperable subsystem to OPERABLE status within 7 days, or:

   a. In OPERATIONAL MODE(s) 1,2 or 3, be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.

   b. In OPERATIONAL MODE *, suspend handling of irradiated fuel in the secondary containment, CORE ALTERATION(s), and operations with a potential for draining the reactor vessel. The provisions of Specification 3.0.C are not applicable.

2. With both standby gas treatment subsystems inoperable in OPERATIONAL MODE(s) 1,2 or 3, restore at least one subsystem to OPERABLE status within one hour, or be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.

4.7 - SURVEILLANCE REQUIREMENTS

P. Standby Gas Treatment System

Each standby gas treatment subsystem shall be demonstrated OPERABLE:

1. At least once per 31 days by initiating, from the control room, flow through the HEPA filters and charcoal adsorbers and verifying that the subsystem operates for at least 10 hours with the heaters operating.

2. At least once per 18 months or (1) after any structural maintenance on the HEPA filter or charcoal adsorber housings, or (2) following painting, fire or chemical release in any ventilation zone communicating with the subsystem by:

   a. Verifying that the subsystem satisfies the in-place penetration and bypass leakage testing acceptance criteria of < 1% and uses the test procedure guidance in Regulatory Positions C.5.a, C.5.c and C.5.d of Regulatory Guide 1.52, Revision 2, March 1978, and the system flow rate is 4000 cfm ± 10%.

   b. Verifying within 31 days after removal that a laboratory analysis of a representative carbon sample obtained in accordance with Regulatory Position C.6.b of Regulatory Guide 1.52, Revision 2, March 1978, meets the laboratory testing criteria of ASTM-D-3803-89, for a methyl iodide penetration of < ~~10%~~ 2.5, when tested at 30°C and 70% relative humidity; and

* When handling irradiated fuel in the secondary containment, during CORE ALTERATION(s), and operations with a potential for draining the reactor vessel.

3.7 - LIMITING CONDITIONS FOR OPERATION

3. With both standby gas treatment subsystems inoperable in OPERATIONAL MODE *, suspend handling of irradiated fuel in the secondary containment, CORE ALTERATION(s), and operations with a potential for draining the reactor vessel. The provisions of Specification 3.0.C are not applicable.

4.7 - SURVEILLANCE REQUIREMENTS

c. Verifying a subsystem flow rate of 4000 cfm ±10% during system operation when tested in accordance with ANSI N510-1980.

3. After every 720 hours of charcoal adsorber operation by verifying within 31 days after removal that a laboratory analysis of a representative carbon sample obtained in accordance with Regulatory Position C.6.b of Regulatory Guide 1.52, Revision 2, March 1978, meets the laboratory testing criteria of ASTM-D-3803-89, for a methyl iodide penetration of <~~10%~~ 2.5 when tested at 30°C and 70% relative humidity.

4. At least once per 18 months by:

a. Verifying that the pressure drop across the combined HEPA filters and charcoal adsorber banks is <6 inches water gauge while operating the filter train at a flow rate of 4000 cfm ±10%.

b. Verifying that the filter train starts and isolation dampers open on each of the following test signals:

1) Manual initiation from the control room, and

2) Simulated automatic initiation signal.

c. Verifying that the heaters dissipate 30 ±3 kw when tested in accordance with ANSI N510-1989. This reading shall include the appropriate correction for variations in voltage.

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* When handling irradiated fuel in the secondary containment, during CORE ALTERATION(s), and operations with a potential for draining the reactor vessel.

5.2 CONTAINMENT

Configuration

5.2.A The primary containment is a steel lined concrete structure consisting of a drywell and suppression chamber. The drywell is a steel structure composed of a spherical lower portion, a cylindrical middle portion, and a hemispherical top head. The drywell is attached to the suppression chamber through a series of downcomer vents. The drywell has a minimum free air volume of 158,236 cubic feet. The suppression chamber has an air region of 116,300 to 112,800 cubic feet and a water region of 116,300 to 119,800 cubic feet.

Design Temperature and Pressure

5.2.B The primary containment is designed and shall be maintained for:

1. Maximum internal pressure: 62 psig.
2. Maximum internal temperature: drywell 281°F.
   suppression pool 281°F.
3. Maximum external pressure: drywell 2 psig.
   suppression pool 1 psig.

Secondary Containment

5.2.C The secondary containment consists of the Reactor Building and a portion of the main steam tunnel and has a minimum free volume of ~~5,760,000~~ 4,500,000 cubic feet.

3.7 - LIMITING CONDITIONS FOR OPERATION

P. Standby Gas Treatment System

Two independent standby gas treatment subsystems shall be OPERABLE.

APPLICABILITY:

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

ACTION:

1. With one standby gas treatment subsystem inoperable, restore the inoperable subsystem to OPERABLE status within 7 days, or:

   a. In OPERATIONAL MODE(s) 1,2 or 3, be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.

   b. In OPERATIONAL MODE *, suspend handling of irradiated fuel in the secondary containment, CORE ALTERATION(s), and operations with a potential for draining the reactor vessel. The provisions of Specification 3.0.C are not applicable.

2. With both standby gas treatment subsystems otherwise inoperable in OPERATIONAL MODE(s) 1,2 or 3, restore at least one subsystem to OPERABLE status within one hour, or be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.

4.7 - SURVEILLANCE REQUIREMENTS

P. Standby Gas Treatment System

Each standby gas treatment subsystem shall be demonstrated OPERABLE:

1. At least once per 31 days by initiating, from the control room, flow through the HEPA filters and charcoal adsorbers and verifying that the subsystem operates for at least 10 hours with the heaters operating.

2. At least once per 18 months or (1) after any structural maintenance on the HEPA filter or charcoal adsorber housings, or (2) following painting, fire or chemical release in any ventilation zone communicating with the subsystem by:

   a. Verifying that the subsystem satisfies the in-place penetration and bypass leakage testing acceptance criteria of <1% and uses the test procedure guidance in Regulatory Positions C.5.a, C.5.c and C.5.d of Regulatory Guide 1.52, Revision 2, March 1978, and the system flow rate is 4000 cfm ±10%.

   b. Verifying within 31 days after removal that a laboratory analysis of a representative carbon sample obtained in accordance with Regulatory Position C.6.b of Regulatory Guide 1.52, Revision 2, March 1978, meets the laboratory testing criteria of ASTM-D-3803-89, for a methyl iodide penetration of <2.5%, when tested at 30°C and 70% relative humidity; and

* When handling irradiated fuel in the secondary containment, during CORE ALTERATION(s), and operations with a potential for draining the reactor vessel.

3.7 - LIMITING CONDITIONS FOR OPERATION	4.7 - SURVEILLANCE REQUIREMENTS
3. With both standby gas treatment subsystems inoperable in OPERATIONAL MODE *, suspend handling of irradiated fuel in the secondary containment, CORE ALTERATION(s), and operations with a potential for draining the reactor vessel. The provisions of Specification 3.0.C are not applicable.	c. Verifying a subsystem flow rate of 4000 cfm ±10% during system operation when tested in accordance with ANSI N510-1980. 3. After every 720 hours of charcoal adsorber operation by verifying within 31 days after removal that a laboratory analysis of a representative carbon sample obtained in accordance with Regulatory Position C.6.b of Regulatory Guide 1.52, Revision 2, March 1978, meets the laboratory testing criteria of ASTM-D-3803-89, for a methyl iodide penetration of <2.5%, when tested at 30°C and 70% relative humidity. 4. At least once per 18 months by: a. Verifying that the pressure drop across the combined HEPA filters and charcoal adsorber banks is <6 inches water gauge while operating the filter train at a flow rate of 4000 cfm ±10%. b. Verifying that the filter train starts and isolation dampers open on each of the following test signals: 1) Manual initiation from the control room, and 2) Simulated automatic initiation signal. c. Verifying that the heaters dissipate 30 ±3 kw when tested in accordance with ANSI N510-1989. This reading shall include the appropriate correction for variations in voltage.

* When handling irradiated fuel in the secondary containment, during CORE ALTERATION(s), and operations with a potential for draining the reactor vessel.

5.2 CONTAINMENT

Configuration

5.2.A The primary containment is a steel lined concrete structure consisting of a drywell and suppression chamber. The drywell is a steel structure composed of a spherical lower portion, a cylindrical middle portion, and a hemispherical top head. The drywell is attached to the suppression chamber through a series of downcomer vents. The drywell has a minimum free air volume of 158,236 cubic feet. The suppression chamber has an air region of 116,300 to 112,800 cubic feet and a water region of 116,300 to 119,800 cubic feet.

Design Temperature and Pressure

5.2.B The primary containment is designed and shall be maintained for:

1.	Maximum internal pressure:	62 psig.
2.	Maximum internal temperature:	drywell 281°F. suppression pool 281°F.
3.	Maximum external pressure:	drywell 2 psig. suppression pool 1 psig.

Secondary Containment

5.2.C The secondary containment consists of the Reactor Building and a portion of the main steam tunnel and has a minimum free volume of 4,500,000 cubic feet.

ATTACHMENT C
Evaluation of Significant Hazards Considerations and
Environmental Assessment Applicability Review

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 Specification Surveillance Requirements 4.7.P.2.b, 4.7.P.3 and Section 5.2.C of Facility Operating Licenses DPR-19 and DPR-25. The purpose of this amendment request is to increase the SBGT charcoal efficiency to address a discrepancy in the free volume of secondary containment. It has been determined that the previously accepted value for secondary containment free volume is higher than the calculated free volume. A review of the issue was performed in accordance with 10CFR50.59 which concluded that the safety impact was minimal; however, the reduced secondary containment free volume results in an increase in the calculated operator dose in the Control Room during a postulated design basis accident. To compensate for this reduction in margin, ComEd proposes to credit an increased SBGT charcoal efficiency and reduce the allowed methyl iodide penetration for SBGT charcoal from 10% to 2.5%. This permits utilization of an increased system efficiency when calculating the postulated dose to control room operators. Control room dose calculations demonstrate that the increase in SBGT charcoal efficiency results in an acceptable operator dose, less than the limits established by GDC 19. Therefore, the increase in SBGT charcoal efficiency adequately addresses the FSAR discrepancy in secondary containment free volume. In addition, the proposed change corrects the free volume of the secondary containment which is provided in Section 5.2.C of the Technical Specifications.

ComEd has evaluated the proposed License 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 consequences of previously analyzed accidents are not significantly affected by this proposed License Amendment. It was determined that the only impact of the secondary containment free volume discrepancy is a small increase in Control Room operator dose. By decreasing the allowed methyl iodide penetration for SBGT system charcoal from 10% to 2.5%, calculated operator dose levels remain within GDC 19

limits. Other consequences of the reduced secondary containment volume do not increase the consequences of an accident previously analyzed.

The proposed change to the SBGT system charcoal results in a net reduction in the consequences of a postulated accident by improving the removal of iodines from releases via the SBGT. The proposed change to the Design Features description of the secondary containment volume is administrative in nature and only affects descriptive information. Therefore, the specific changes do not result in an increase in the consequences of a previously analyzed accident.

The proposed License Amendment will not result in the reactor operating in a different condition such which could adversely affect the initial conditions assumed in any design basis accident analysis.

The systems affected by this amendment are not postulated as initiators for any accident sequence at Dresden Station; and therefore, the probability of an accident previously evaluated is not affected by the proposed amendment.

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

The proposed license amendment does not create the possibility of a new or different kind of accident previously evaluated for Dresden Station. No new modes of operation are introduced by the proposed changes. This change merely increases the SBGT efficiency when tested in accordance with industry standards. This increase in SBGT charcoal efficiency is required and proposed to compensate for the discrepancy in secondary containment free volume. In addition, the proposed change merely corrects the descriptive material in section 5.0, Design Features, such that the more accurate secondary containment free volume is provided. Based on this, the proposed changes do not create the possibility of a new or different kind of accident.

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

The proposed license amendment does not significantly affect existing plant safety margins or the reliability of the equipment assumed to operate in the safety analysis. The proposed changes ensure that Control Room operator dose levels remain below GDC 19 limits considering the impact of the secondary containment free volume discrepancy. In addition, the proposed license amendment for Dresden Station will not reduce or otherwise affect the availability or capability of systems required to mitigate accident conditions. As described in the bases for the change, the secondary containment free volume is not utilized as an input parameter to calculations utilized

to demonstrate compliance with off-site dose limits. Other secondary containment functions have been evaluated and demonstrated to remain unaffected by the reduced secondary containment volume. 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 Hazard 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
Evaluation of Significant Hazards Considerations and Environmental Assessment Applicability Review

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.