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April 17, 1997

JSPLTR 97-0080

US Nuclear Regulatory Commission  
Washington, D. C. 20555-0001

Attention: Document Control Desk

Subject: Dresden Nuclear Power Station Units 2 and 3  
Revision to Emergency Application for Amendment to Facility  
Operating Licenses DPR-19 and DPR-25 Pursuant To  
10CFR50.91(a)(5) which requests Exigent review per  
10CFR50.91(a)(6)  
Amendment to Resolve Issues Related to Discrepancy in Secondary  
Containment Volume  
Docket Nos. 50-237 and 50-249

Reference: (a) J. S. Perry (ComEd) to USNRC letter dated April 14, 1997  
(b) J. S. Perry to USNRC letter dated December 18, 1996

On April 14, 1997, Reference (a) was submitted to the NRC staff requesting approval on an emergency basis, pursuant to 10CFR50.91(a)(5), of a change to the Technical Specifications concerning Standby Gas Treatment charcoal methyl iodide penetration, and the free volume of the Secondary Containment (TS Section 5.2.C). This letter informs the staff that, due to unforeseen issues raised during the current forced outage on Dresden Unit 2, the need for emergency review no longer exists. Therefore, ComEd proposes to revise its application from an emergency review to instead request exigent review by the staff. ComEd also is providing additional bases for an exigent amendment.

In Reference (b), ComEd informed the staff of a discrepancy between the net free volume of the Secondary Containment used in the control room habitability analysis and the actual Secondary Containment Volume. Per the guidance provided by Generic Letter 91-18, ComEd performed an operability determination which resulted in the institution of a more restrictive administrative limit of SBTG charcoal methyl iodide penetration of  $\leq 7\%$ , 3% more conservative than the current TS limit of  $\leq 10\%$ .

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Also within Reference (b), ComEd stated that a new habitability analysis using the Standard Review Plan (NUREG-0800, SRP) methodology may allow retention of the current TS value for methyl iodide penetration of  $\leq 10\%$  and initiated the revision process for a revised control room habitability study. The completion of the revised study was scheduled for early April 1997, however, it will be completed no earlier than April 30, 1997.

On March 24, 1997, the Staff informed ComEd that a reduced Secondary Containment Volume may, in of itself, represent a USQ. On April 9, 1997, ComEd completed the Safety Evaluation, determining that an USQ existed due to a reduction in the margin to safety with respect to dose to the operators within the main control room.

During the review period, Dresden Unit 3 began its fourteenth refueling outage. ComEd understood that review and approval by the staff of proposed technical specification change and USQ would be required prior to resumption of power of Unit 3. Therefore, the amendment preparation schedule was accelerated to submit a amendment request in sufficient time to facilitate a normal review by the Staff (without the need for exigent or emergency circumstances) for approval by June 2, 1997. However, Dresden Unit 2 reduced power to Mode 4 on April 11, 1997 (two days after the determination that a USQ existed) to rectify deficiencies associated with 4Kv breakers. As previously stated in Reference (a), Unit 2 was scheduled for return to service by April 21, 1997. However, the resolution of additional issues is expected to delay the return to service of Unit 2 until May 1, 1997. Therefore, ComEd is revising its request for review under 10 CFR 50.91(a)(5) to review under 10CFR50.91(a)(6).

Pursuant to 10CFR50.91(a)(6), ComEd requests exigent approval of this amendment to address the USQ and approve a decrease in the methyl iodide penetration for SBTG charcoal allowed by the Technical Specifications. Approval of this amendment on an exigent basis is warranted because the current situation satisfies the Commission's requirements for exigent review: Failure to act in a timely way would result in the prevention of resumption of operation. Approval is requested by April 30, 1997 to prevent a delay in return to service of Dresden Unit 2.

Per the discussion presented above and in Reference (a), this exigent situation could not have been avoided for Dresden and therefore, ComEd believes that the circumstances described above meet the criteria of 10CFR50.91(a)(6) for review and approval on an exigent basis.

The supplemental information presented herein is administrative in nature and serves to expand the basis for satisfying the criteria specified in 10CFR50.91(a)(6). The information presented in Reference (a) continues to demonstrate that the proposed Technical Specification change is acceptable for Dresden. ComEd's significant hazards evaluation presented in Reference (a) is unaffected by the supplemental information presented herein as the proposed amendment continues to ensure that

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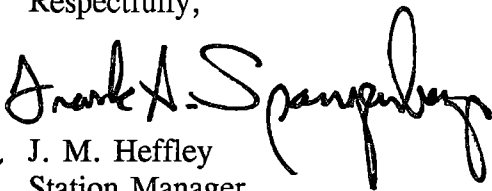
operation of the facility in accordance with the proposed Technical Specification changes do not involve a significant increase in the probability or consequences of any accident previously evaluated; or create the possibility of a new or different kind of accident from any accident previously evaluated; or involve a significant reduction in a margin of safety. As such, a revised significant hazards evaluation is unwarranted.

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 ComEd 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.

If you have any questions concerning this letter, please contact Frank Spangenberg, Regulatory Assurance Manager, at (815) 942-2920, extension 3800.

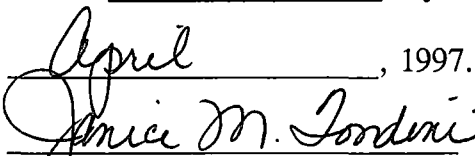
Respectfully,

*for*   
J. M. Heffley  
Station Manager  
Dresden Station

Subscribed and Sworn to before me

on this 17<sup>th</sup> day of

April, 1997.

  
Notary Public



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