ATTACHMENT B

PROPOSED CHANGES TO THE TECHNICAL SPECIFICATIONS

Page 3/4.6-7

3.6 - LIMITING CONDITIONS FOR OPERATION

E. Safety Valves

The safety valve function of the 9 reactor coolant system safety valves shall be OPERABLE in accordance with the specified code safety valve function lift settings[a] established as:

1 safety valve[b] @1135 psig ±1%
2 safety valves @1240 psig ±1%
2 safety valves @1250 psig ±1%
4 safety valves @1260 psig ±1%

APPLICABILITY:

OPERATIONAL MODE(s) 1, 2 and 3.

ACTION:

1. With the safety valve function of one or more of the above required safety valves inoperable, be in at least HOT SHUTDOWN within 12 hours and in COLD SHUTDOWN within the next 24 hours.

2. Deleted.

4.6 - SURVEILLANCE REQUIREMENTS

E. Safety Valves

1. Deleted.

2. At least once per 18 months, 1/2 of the safety valves shall be removed, set pressure tested and reinstalled or replaced with spares that have been previously set pressure tested and stored in accordance with manufacturer's recommendations. At least once per 40 months[c], the safety valves shall be rotated such that all 9 safety valves are removed, set pressure tested and reinstalled or replaced with spares that have been previously set pressure tested and stored in accordance with manufacturer's recommendations.

(c)

c The surveillance interval has been extended to 60 months for Unit 3, Cycle 15 only, and the provisions of Specification 4.0.B are not applicable to the 60-month interval.

a The lift setting pressure shall correspond to ambient conditions of the valves at nominal operating temperatures and pressures.

b Target Rock combination safety/relief valve.

ATTACHMENT C

SIGNIFICANT HAZARDS CONSIDERATION

The Commission has provided standards for determining whether a significant hazards consideration exists as stated in 10CFR50.92(c). A proposed amendment to an operating license involves a 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 SR 4.6.E of Facility Operating License DPR-25. The amendment request changes are consistent with the requirements of ASME Code Section XI, Subsection IWV 3511, which refers to ANSI/ASME standard OM-1-1981; and NUREG 1482.

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 Unit 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 proposed changes request a one-time change to the surveillance requirement for the MSSVs. The surveillance interval between safety valve testing is not a precursor assumed in any previously analyzed accident. Therefore, the probability of a previously evaluated accident has not been increased.

   The proposed extension is consistent with the ASME Code requirement to test all valves within 60 months. The proposed changes are also consistent with NUREG 1433 and do not adversely affect existing plant safety margins or the reliability of the equipment assumed to operate in the safety analysis. Operating experience and superior materiel condition of the MSSVs support the expectation that they will continue to perform their intended function. Therefore, the consequences of a previously evaluated accident have not been increased.

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

   No new equipment is required, nor will the MSSVs be operated in a different manner during the period of the extended surveillance interval. The proposed change is consistent with NUREG 1433 requirements for safety valve surveillance intervals as well as the ASME Code for requirements testing safety valves. Operating experience and superior materiel condition of the MSSVs support the expectation that they will continue to perform their intended function. Therefore, the possibility of a new or different accident has not been increased.

ATTACHMENT C

SIGNIFICANT HAZARDS CONSIDERATION

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

The proposed amendment represents an extension to the current TS requirements, but would otherwise be provided generically by ASME Code. The proposed changes are also consistent with NUREG-1433, request a shorter total interval than previously granted by the Staff (Reference b)), and do not adversely affect existing plant safety margins or the reliability of the equipment assumed to operate in the safety analysis. The proposed changes have been evaluated and found to be acceptable for use at Dresden based on system safety analysis requirements and operational performance. The MSSV provisions continue to be adequately maintained during plant operation. The proposed changes to the MSSV surveillance interval do not significantly reduce existing plant safety margins since excellent materiel condition and acceptable surveillance test results support the expectation that no significant degradation will occur over the extended interval.

The proposed changes are based on NRC accepted provisions at other operating plants that are applicable at Dresden and maintain necessary levels of system or component reliability.

The proposed amendment for Dresden will not reduce the availability of systems required to mitigate accident conditions; 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 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 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

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.

ATTACHMENT D

AS-FOUND AND AS LEFT MSSV TEST RESULTS

Main Steam Safety Valve As-Found Test Data

Serial Number	Refuel Outage Removed	Position Removed From	Tag Pressure	As-Found Lift	Acceptable (±1%)	Acceptable (±3%)
Unit 2:						
BK-7161	D2R15	2-0203-4A	1240 psi	1212 psi	No	Yes
BK-6290	D2R15	2-0203-4B	1260 psi	1273 psi	No	Yes
BK-6271	D2R15	2-0203-4C	1250 psi	1240 psi	Yes	Yes
BK-6260	D2R15	2-0203-4D	1260 psi	1266 psi	Yes	Yes
BK-6288	D2R14	2-0203-4E	1260 psi	1270 psi	Yes	Yes
BK-7157	D2R14	2-0203-4F	1260 psi	1256 psi	Yes	Yes
BK-7160	D2R14	2-0203-4G	1240 psi	1225 psi	No	Yes
BK-6530	D2R14	2-0203-4H	1250 psi	1253 psi	Yes	Yes
BK-6272	D2R13	2-0203-4A	1240 psi	1229 psi	Yes	Yes
BK-6296	D2R13	2-0203-4B	1260 psi	1248 psi	Yes	Yes
BK-6277	D2R13	2-0203-4C	1250 psi	1265 psi	No	Yes
BK-6525	D2R13	2-0203-4D	1260 psi	1255 psi	Yes	Yes
Unit 3:						
BK-6299	D3R14	3-0203-4E	1240 psi	1237 psi	Yes	Yes
BK-6263	D3R14	3-0203-4F	1260 psi	1263 psi	Yes	Yes
BK-6526	D3R14	3-0203-4G	1250 psi	1234 psi	No	Yes
BK-6532	D3R14	3-0203-4H	1260 psi	1254 psi	Yes	Yes
BK-6527	D3R13	3-0203-4A	1240 psi	1248 psi	Yes	Yes
BK-6282	D3R13	3-0203-4B	1260 psi	1262 psi	Yes	Yes
BK-6304	D3R13	3-0203-4C	1250 psi	1246 psi	Yes	Yes
BK-7162	D3R13	3-0203-4D	1260 psi	1250 psi	Yes	Yes

+/- 1% TS Limits	
1240 psi	1228-1252 psi
1250 psi	1238-1262 psi
1260 psi	1248-1272 psi

ATTACHMENT D

AS-FOUND AND AS LEFT MSSV TEST RESULTS

Main Steam Safety Valve As-Left Test Data

Serial Number	Refuel Outage	Installed Position	Tag Pressure	Intital Pop	Second Pop
Unit 2:					
BK-6299	D2R15	2-0203-4A	1240 psi	1236 psi	1242 psi
BK-6263	D2R15	2-0203-4B	1260 psi	1264 psi	1265 psi
BK-6526	D2R15	2-0203-4C	1250 psi	1244 psi	1258 psi
BK-6532	D2R15	2-0203-4D	1260 psi	1258 psi	1262 psi
BK-7162	D2R14	2-0203-4E	1260 psi	1264 psi	1260 psi
BK-6282	D2R14	2-0203-4F	1260 psi	1264 psi	1259 psi
BK-6527	D2R14	2-0203-4G	1240 psi	1234 psi	1243 psi
BK-6304	D2R14	2-0203-4H	1250 psi	1249 psi	1256 psi
Unit 3:					
BK-6272	D3R13	3-0203-4A	1240 psi	1236 psi	1233 psi
BK-6296	D3R13	3-0203-4B	1260 psi	1268 psi	1253 psi
BK-6277	D3R13	3-0203-4C	1250 psi	1254 psi	1254 psi
BK-6525	D3R13	3-0203-4D	1260 psi	1263 psi	1258 psi
BK-6288	D3R14	3-0203-4E	1260 psi	1258 psi	1261 psi
BK-7157	D3R14	3-0203-4F	1260 psi	1260 psi	1264 psi
BK-7160	D3R14	3-0203-4G	1240 psi	1245 psi	1246 psi
BK-6530	D3R14	3-0203-4H	1250 psi	1255 psi	1250 psi
Spares:					
BK-6270			1240 psi	1236 psi	1236 psi
BK-6312			1250 psi	1244 psi	1254 psi
BK-6265			1260 psi	1264 psi	1262 psi
BK-6528			1260 psi	1260 psi	1262 psi
BK-7161	Removed D2R15		1240 psi		
BK-6271	Removed D2R15		1250 psi		
BK-6260	Removed D2R15		1260 psi		
BK-6290	Removed D2R15		1260 psi		