

**ATTACHMENT B
MARKED-UP PAGES FOR PROPOSED CHANGES**

Page 1 of 1

REVISED PAGES

3/4.6-7
3/4.6-7a

9905120200 990505
PDR ADOCK 05000249
P PDR

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^{1a} established as:

- 1 safety valve^{1a} @1135 psig \pm 1%
- 2 safety valves @1240 psig \pm 1%
- 2 safety valves @1250 psig \pm 1%
- 4 safety valves @1260 psig \pm 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^{1d}, 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.

-
- 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.
 - 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.

3.8 - LIMITING CONDITIONS FOR OPERATION

E. Safety Valves

+ The safety valve function of the 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^(a) @ 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^(a), 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.

Verify the safety function lift setpoints^(a) of the required safety valves are as follows:

- 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.
- 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.

Excluding the Target Rock valve,

**ATTACHMENT C
SIGNIFICANT HAZARDS CONSIDERATION**

Page 1 of 2

ComEd has evaluated this proposed amendment and has determined that it does not represent a significant hazards consideration. According to 10 CFR 50.92(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:

Involve a significant increase in the probability of occurrence or consequences of an accident previously evaluated;

Create the possibility of a new or different kind of accident from any previously analyzed; or

Involve a significant reduction in a margin of safety.

ComEd proposes to change the number of safety valves provided in Technical Specifications Section 3.6.E, Primary System Boundary – Safety Valves.

The determination that the criteria set forth in 10 CFR 50.92 (c) is met for this amendment request is indicated below:

Does the change involve a significant increase in the probability of occurrence or consequences of an accident previously evaluated?

The probability of an evaluated accident is derived from the probabilities of the individual precursors to that accident. The consequences of an evaluated accident are determined by the operability of plant systems designed to mitigate those consequences. Limits have been established consistent with NRC-approved methods to ensure that fuel performance during normal, transient, and accident conditions is acceptable. The proposed change to permit operation with the Target Rock valve safety function OOS does not affect the ability of plant systems to adequately mitigate the consequences of an accident previously evaluated.

This conclusion was derived by evaluating all applicable analyses including thermal limit, ASME pressurization events, margin to unpiped safety valve, anticipated transient analysis without scram, LOCA, station blackout, and Appendix R analyses. Therefore, there is no increase in the probability or consequences of an accident previously evaluated because the analyses support operation with the Target Rock SRV safety function OOS.

ATTACHMENT C
SIGNIFICANT HAZARDS CONSIDERATION

Page 2 of 2

Does the change create the possibility of a new or different kind of accident from any accident previously evaluated?

Since the requested change has been previously evaluated, no new precursors of an accident are created and no new or different kinds of accidents are created. Therefore, the proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

This conclusion was derived by evaluating all applicable analyses including thermal limit, ASME pressurization events, margin to un piped safety valve, anticipated transient analysis without scram events, station blackout, and Appendix R analyses. Therefore, the proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated because the analyses support operation with the Target Rock SRV safety function OOS.

Does the change involve a significant reduction in a margin of safety?

Allowing Dresden operation with the Target Rock SRV safety function out of service will not involve any reduction in margin of safety. This conclusion was derived by evaluating all existing analyses including thermal limit, ASME pressurization events, margin to un piped safety valve, anticipated transient analysis without scram events, station blackout, and Appendix R analyses. The analyses previously evaluated remain valid and conservative. Thus there is no reduction in the margin of safety.

Therefore, based upon the above evaluation, ComEd has concluded that these changes do not constitute a significant hazards consideration.

ATTACHMENT D
ENVIRONMENTAL ASSESSMENT
JMHLTR-99-0057
Page 1 of 1

We have evaluated this NOED against the criteria for identification of licensing and regulatory actions requiring environmental assessment in accordance with 10 CFR 51.21. We have determined that this requested action meets the criteria for a categorical exclusion set forth in 10 CFR 51.22(c)(9) and, as such, have determined that no irreversible consequences exist in accordance with 10 CFR 50.92(b). This determination is based on the fact that this is an NOED relative to a license issued pursuant to 10 CFR 50, that reflects a requirement with respect to the use of a facility component located within the restricted area, as defined in 10 CFR 20, and the action meets the following specific criteria.

- (i) The proposed action involves no significant hazards consideration. As demonstrated in Section 4 of this enclosure, this NOED does not involve any significant hazards consideration.
- (ii) There is no significant change in the types or significant increase in the amounts of any effluent that may be released offsite. The NOED does not affect the generation of any radioactive effluent. The NOED would allow the operation of Unit 3 for a longer period of time with the Target Rock SRV inoperable than allowed by TS. However, the resulting overall increase in risk is minimal. It is anticipated that plant equipment would operate as expected in the event of an accident to minimize the potential for any leakage of radioactive effluents.
- (iii) There is no significant increase in individual or cumulative occupational radiation exposure. The proposed action will not change the level of controls or methodology used for processing of radioactive effluents or handling of solid radioactive waste, nor will the proposed action result in any change in the normal radiation levels within the plant. Therefore, there will be no increase in individual or cumulative occupational radiation exposure resulting from this change.