

**ATTACHMENT B**

**EVALUATION OF NO SIGNIFICANT HAZARDS CONSIDERATION**

**PROPOSED CHANGES TO THE TECHNICAL SPECIFICATIONS**

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**B3/4.5-4**

**3/4.8-1**

**3/4.8-3**

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Two (a)

3.8 - LIMITING CONDITIONS FOR OPERATION

4.8 - SURVEILLANCE REQUIREMENTS

A. Containment Cooling Service Water System

A. Containment Cooling Service Water System

At least the following independent containment cooling service water (CCSW) subsystems, with each subsystem comprised of:

Each of the required CCSW subsystems shall be demonstrated OPERABLE at least once per 31 days by verifying that each valve, manual or power operated, in the flow path that is not locked, sealed or otherwise secured in position, is in its correct position.

1. Two OPERABLE CCSW pumps, and
2. An OPERABLE flow path capable of taking suction from the ultimate heat sink and transferring the water:
  - a. Through one LPCI heat exchanger, and separately,
  - b. To the associated safety related equipment,

shall be OPERABLE:

1. In OPERATIONAL MODE(s) 1, 2 and 3, two subsystems.
2. In OPERATIONAL MODE \*, the subsystem(s) associated with subsystems/loops and components required OPERABLE by Specification 3.8.D.

APPLICABILITY:

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

a Any one of four Unit 2 CCSW pumps is required to support CREVS KCU operation.

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

3.5 - LIMITING CONDITIONS FOR OPERATION

4.5 - SURVEILLANCE REQUIREMENTS

C. Suppression Chamber

The suppression chamber shall be OPERABLE:

1. In OPERATIONAL MODE(s) 1, 2, and 3 with a contained water volume equivalent to a water level of  $\geq 14' 6.5''$  above the bottom of the suppression chamber.
2. In OPERATIONAL MODE(s) 4 and 5<sup>(a)</sup> with a contained volume equivalent to a water level of  $\geq 8'$  above the bottom of the suppression chamber, except that the suppression chamber level may be less than the limit provided that:
  - a. No operations are performed that have a potential for draining the reactor vessel,
  - b. The reactor mode switch is locked in the Shutdown or Refuel position,
  - c. The condensate storage tank contains  $\geq 140,000$  available gallons of water, and
  - d. The ECCS systems are OPERABLE per Specification 3.5.B.

C. Suppression Chamber

The suppression chamber shall be determined OPERABLE by verifying:

1. For OPERATIONAL MODE(s) 1, 2 and 3, at least once per 24 hours, the water level to be  $\geq 14' 6.5''$ .
2. For OPERATIONAL MODE(s) 4 or 5<sup>(a)</sup>, at least once per 12 hours:
  - a. The water level to be  $\geq 8'$  or
  - b. Verify the alternate conditions of Specification 3.5.C.2, or the conditions of footnote (a), to be satisfied.

10' 4"

APPLICABILITY:

OPERATIONAL MODE(s) 1, 2, 3, 4 and 5<sup>(a)</sup>.

a The suppression chamber is not required to be OPERABLE provided that the reactor vessel head is removed, the cavity is flooded or being flooded from the suppression pool, the spent fuel pool gates are removed when the cavity is flooded, and the water level is maintained within the limits of Specification 3.10.G and 3.10.H.

BASES3/4.5.C     Suppression Chamber

The suppression chamber is required to be OPERABLE as part of the ECCS to ensure that a sufficient supply of water is available to the HPCI and CS systems and the LPCI subsystem in the event of a LOCA. This limit on suppression chamber minimum water volume ensures that sufficient water is available to permit recirculation cooling flow to the core. The OPERABILITY of the suppression chamber in OPERATIONAL MODE(s) 1, 2 or 3 is also required by Specification 3.7.K.

Repair work might require making the suppression chamber inoperable. This specification will permit those repairs to be made and concurrently provide assurance that the irradiated fuel has an adequate cooling water supply when the suppression chamber must be made inoperable, including draining, in OPERATIONAL MODE(s) 4 or 5.

In OPERATIONAL MODE(s) 4 and 5 the suppression chamber minimum required water volume is reduced because the reactor coolant is maintained at or below 212°F. Since pressure suppression is not required below 212°F, the minimum water volume is based on net positive suction head (NPSH), recirculation volume and vortex prevention plus a safety margin for conservation. With the suppression chamber water level less than the required limit, all ECCS subsystems are inoperable unless they are aligned to an OPERABLE condensate storage tank. When the suppression chamber level is less than 8 feet the CS system or the LPCI subsystem is considered OPERABLE only if it can take suction from the condensate storage tank, and the condensate storage tank water level is sufficient to provide the required NPSH for the CS or LPCI pumps. Therefore, a verification that either the suppression chamber water level is greater than or equal to 8 feet or that CS or LPCI is aligned to take suction from the condensate storage tank and the condensate storage tank contains greater than or equal to 140,000 gallons of water, ensures CS or LPCI can supply at least 50,000 gallons of make-up water to the reactor pressure vessel. The CS suction is uncovered at the 90,000 gallon level.

10'4"

3/4.5.D     Isolation Condenser

The isolation condenser is provided for core decay heat removal following reactor isolation from the main condenser and reactor scram. The isolation condenser has a heat removal capacity (252.5 x 10<sup>6</sup> BTU/hour) sufficient to handle the decay heat production at 300 seconds following a scram. Following a reactor scram and an isolation from the main condenser, water will be lost from the reactor vessel through the relief valves during the first 300 seconds. This represents a minor loss relative to the vessel inventory.

The system may be manually initiated at any time. The system is automatically initiated on high reactor pressure in excess of 1070 psig sustained for 17 seconds. The time delay is provided to prevent unnecessary actuation of the system during anticipated turbine trips. Automatic initiation is provided to minimize the coolant loss following isolation from the main condenser. To be considered OPERABLE, the shell side of the isolation condenser must contain sufficient volume to meet the heat removal requirements specified in the UFSAR. Make-up water to the shell side of.

3.8 - LIMITING CONDITIONS FOR OPERATION

4.8 - SURVEILLANCE REQUIREMENTS

2. In OPERATIONAL MODE \* with the CCSW subsystem which is associated with the safety related equipment required OPERABLE by Specification 3.8.D inoperable, declare the associated safety related equipment inoperable and take the ACTION required by Specification 3.8.D.

pump

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

## ATTACHMENT C

### EVALUATION OF NO 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 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.

The proposed changes to Technical Specification 3.8.A Limiting Conditions for Operation to clarify that only 1 CCSW pump is required to support operation of the CREVS

The second proposed change is to raise the allowable suppression pool level during OPERATIONAL MODES 4 and 5 to restore margin required to prevent vortexing in the ECCS pump suction.

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 Units 2 & 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 to the technical specifications provide clarity in the support system relationship and requirements for the CCSW system support of the CREVS operation. The CCSW system nor the CREVS system are assumed to be accident precursors for previously evaluated accident. Therefore, the proposed changes have no effect on the probability or consequences of accidents previously evaluated.

The proposed change to the allowable suppression chamber level does not involve a significant increase in the probability or consequences of an accident previously evaluated. The proposed change revises a Technical Specification acceptance value to more conservative value and serves to ensure operability of equipment important to safety. By ensuring equipment availability, the probability or consequences of an accident previously evaluated are not increased. In addition, the proposed changes have no impact on any initial condition assumptions for accident scenarios. Onsite or offsite dose consequences resulting from an event previously evaluated are not affected by this proposed amendment request.

## ATTACHMENT C

### EVALUATION OF NO SIGNIFICANT HAZARDS CONSIDERATION

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

The proposed changes do not create the possibility of a new or different kind of accident from that previously evaluated. The changes to the CCSW specifications more appropriate reflect the design requirements and clarify the support role of the CCSW system as it relates the CREVS. Neither the CCSW system nor the CREVS will be operated differently with the proposed change. Therefore new or different failure modes will not be created. Therefore, the possibility of new and different accidents has not been created with the proposed change

The proposed change to the suppression pool allowable level restores margin to the Technical Specifications and ensures equipment operability. The proposed change is conservative with respect to current requirements. The proposed amendment does not involve any plant physical changes that would create the possibility of a new or different kind of accident from any accident previously evaluated.

Therefore, the proposed amendment does not create the possibility of a new or different kind of accident from any accident previously evaluated.

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

The proposed change to the CCSW technical specification will not result in a significant reduction in the margin of safety. The proposed change has greater consistency with the current design requirements for CSSW support of CREVS operation. Therefore, the margin of safety has been not been altered.

The proposed changes for suppression pool level does not involve a significant reduction in a margin of safety. In fact, the proposed changes restore margin and ensure equipment operability. Since the changes maintain the necessary level of system reliability, they do not involve a significant reduction in the margin of safety.

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.

## ATTACHMENT C

### EVALUATION OF NO SIGNIFICANT HAZARDS CONSIDERATION

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 D

### ENVIRONMENTAL ASSESSMENT

#### ENVIRONMENTAL ASSESSMENT

ComEd has evaluated this proposed operating license amendment request against the criteria for identification of licensing and regulatory actions requiring environmental assessment in accordance with 10 CFR 51.21. ComEd has determined that this proposed license amendment request meets the criteria for a categorical exclusion set forth in 10 CFR 51.22(c)(9) and as such, has determined that no irreversible consequences exist in accordance with 10 CFR 50.92(b). This determination is based on the fact that this change is being proposed as an amendment to a license issued pursuant to 10 CFR 50 that changes a requirement with respect to installation or use of a facility component located within the restricted area, as defined in 10 CFR 20, or that changes an inspection or a surveillance requirement, and the amendment meets the following specific criteria:

- (i) the amendment involves no significant hazards consideration.

As demonstrated in Attachment C, this proposed amendment 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.

As documented in Attachment C, there will be no change in the types or significant increase in the amounts of any effluents released offsite.

- (iii) there is no significant increase in individual or cumulative occupational radiation exposure.

The proposed changes will not result in changes in the operation or configuration of the facility. There will be no change in the level of controls or methodology used for processing of radioactive effluents or handling of solid radioactive waste, nor will the proposal 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.