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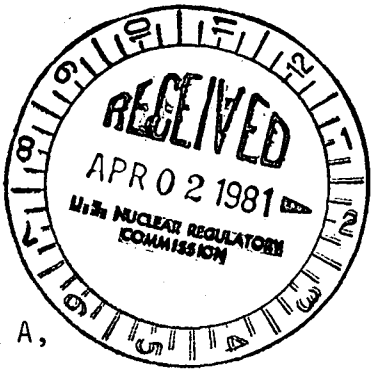
March 27, 1981



Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Subject: Dresden Station Unit 2
Proposed Amendment to Appendix A,
Technical Specitications to
Operating License DPR-19
NRC Docket No. 50-237

Dear Mr. Denton:

Pursuant to 10 CFR 50.59, Commonwealth Edison Company proposed to amend Appendix A, Technical Specifications, to Operating License DPR-19 for Dresden Unit 2. These changes concern revision of the tables identifying safety related shock suppressors (snubbers).

As a result of the evaluations of the seismic design of safety related piping required by IE Bulletin 79-14, changes to the safety related supports for various lines in the Dresden 2 drywell is required. During reanalysis of the piping systems, stresses in excess of the original FSAR requirements were discovered. The overstressed locations were primarily at snubber welded attachments to the piping systems.

The reanalysis of the piping identified locations were existing safety related snubbers were to be removed and additional rigid restraints or snubbers were to be added. Since these snubbers are identified in the Technical Specifications, an amendment is required to Table 3.6.1 to identify the deletion or addition of snubbers.

As indicated earlier, detailed analyses of the piping systems were performed in accordance with the requirements of IE Bulletin 79-14 which identified overstressed areas and confirmed the adequacy of the revised configurations. Attachment 1 to this letter summarizes the results of these analyses and lists the areas where overstress was identified, the as-found stresses, and the final stresses based on the revised configuration. Based on these results, we conclude that the revised configuration reduces the system stress due to a seismic event and results in stresses within the original design basis for the plant. The changes to Table 3.6.1, therefore do not increase the potential risk to the public health and safety.

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In addition, since all snubbers in the containment are now of the mechanical type, we have for the sake of clarity replaced the one Table 3.6.1 with two tables, 3.6.1a and 3.6.1b, for hydraulic and mechanical snubbers, respectively.

The proposed changes are provided in Attachment 2 to this letter and consist of new Tables 3.6.1a and 3.6.1b and a revised page 91b. These changes have received On-Site and Off-Site review and approval.

For purposes of schedule, these changes require approval prior to startup from the current refueling outage, presently expected to occur on May 1, 1981.

Pursuant to 10 CFR 170, Commonwealth Edison Co. has reviewed the proposed amendment and determined it it be Class III. As such, a fee remittance in the amount of $4,000.00 has been provided.

Three (3) signed originals and thirty-seven (37) copies of this transmittal are provided for your use.

Very truly yours,

Robert F. Janecek

Robert F. Janecek
Nuclear Licensing Administrator
Boiling Water Reactors

cc: RIII Inspector, Dresden

SUBSCRIBED and SWORN to
before me this 27TH
day of March, 1981

Notary Public

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ATTACHMENT 1

Summary of As-Found and Revised Piping Stresses

Dresden Station Unit 2

Table II.a

Dresden 2 Inaccessible Systems
As-built Piping Stress Evaluation
Maximum Stress for Occasional Loading Condition[1,2]

Problem No.	S_{OBE}[3] (psi)	Allowable Stress (psi)	S_{DBE}[3] (psi)	Allowable Stress (psi)
RBED-01B(C)	17,490	18,000	31,706	35,000
RBED-02B(C)	11,857	18,000	20,174	35,000
RRCI-01C	29,953	17,280	49,251	30,000
RWCU-01B(C)	17,744	13,356	31,548	30,000
RWCU-02B(C)	22,894	17,280	32,580	30,000
SLC-02B(C)	20,405	20,850	30,183	30,000
WWTR-02B(C)	21,891	18,000	38,999	30,000

1. $Pd^2/(D^2 - d^2) + \sigma g + \sigma OBE \leq 1.2\ Sh$
2. $Pd^2/(D^2 - d^2) + \sigma g + \sigma DBE \leq Sy$ cold
3. Maximum envelope or actual stress

Table II.a (continued)

Dresden 2 Inaccessible Systems
As-built Piping Stress Evaluation
Maximum Stress for Occasional Loading Condition[1,2]

Problem No.	S_{OBE}[3] (psi)	Allowable Stress (psi)	S_{DBE}[3] (psi)	Allowable Stress (psi)
COSP-01B(C)	11,332	19,200	20,184	30,000
COSP-02B(C)	7,604	19,200	11,779	30,000
CRDS-02B(C)	10,312	13,140	15,048	30,000
FW-01C	33,335	18,000	61,395	35,000
FW-02C	16,120	18,000	25,740	35,000
HDSP-01B(C)	28,733	13,140	54,268	30,000
HPCI-02C	14,708	18,000	24,519	35,000
HPCI-09B(C)	55,953	18,000	>ultimate	35,000
ISCO-03C	11,579	13,320	15,114	30,000
ISCO-04C	11,424	13,320	15,651	30,000
LPCI-09C	19,401	17,280	32,519	30,000
LPCI-10C	19,401	17,280	32,519	30,000
RBCW-01B(C)	7,488	18,000	13,312	30,000
RBCW-02B(C)	9,377	18,000	16,874	35,000

Table II.b

Dresden 2 Inaccessible Systems
Piping Stress Evaluation after IE Bulletin 79-14 Modification
Maximum Stress for Occasional Loading Condition

Problem No.	Rev.	S_{OBE}[3] (psi)	Allowable Stress (psi)	S_{DBE}[3] (psi)	Allowable Stress (psi)
FW-01C	0	13,802	18,000	20,701	35,000
FW-02C	2	16,505	18,000	25,737	35,000
HDSP-01B(C)	0	17,073	21,180	29,567	30,000
HPCI-02C	2	15,316	18,000	17,536	35,000
HPCI-09B(C)	1	14,167	18,000	22,450	35,000
LPCI-09C	1	13,571	17,280	19,982	30,000
LPCI-10C	0	13,571	17,280	19,982	30,000
RRCI-01C	3	17,169	17,280	28,657	30,000
RWCU-01B(C)	0	13,193	13,356	22,528	30,000
RWCU-02B(C)	3	14,707	17,280	22,980	30,000
SLC-02B(C)	1	19,668	20,850	29,016	30,000
WWTR-02B(C)	3	15,326	18,000	24,869	35,000

1. $Pd^2/(D^2 - d^2) + \sigma g + \sigma OBE \leq 1.2\ Sh$
2. $Pd^2/(D^2 - d^2) + \sigma g + \sigma DBE \leq Sy$ cold
3. Maximum envelope or actual stress