



**Commonwealth Edison**  
 One First National Plaza, Chicago, Illinois  
 Address Reply to: Post Office Box 767  
 Chicago, Illinois 60690

November 23, 1981



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

Subject: Dresden Station Unit 3  
 Proposed Amendment to Facility Operating  
 License No. DPR-25 Regarding Surveillance  
 Of Automatic Pressure Relief Valves  
 When HPCI Subsystem is Inoperable  
NRC Docket No. 50-249

- References (a): T. J. Rausch letter to H. R. Denton dated  
 September 4, 1981
- (b): D. M. Crutchfield letter to L. DelGeorge  
 dated September 15, 1981 (SER for DPR-19  
 Am. 65)

Dear Mr. Denton:

Pursuant to 10 CFR 50.59, Commonwealth Edison hereby requests an immediate temporary change to Facility Operating License No. DPR-25. The change requested is to delete the Technical Specification surveillance requirement to test the automatic pressure relief valves when the HPCI subsystem is inoperable for the ensuing six days.

The HPCI system was declared inoperable on November 22, 1981 following investigation of trouble with the HPCI steam supply isolation valve number 3-2301-4. Initially, position indication was lost on the valve. Attempts to close the valve caused the breaker for the motor operator to trip. HPCI was then declared inoperable, and HPCI isolation valve 3-2301-5 was closed. Subsequent inspections revealed an apparent ground short in the motor.

Technical Specification 4.5.C.2. currently requires that the several remaining ECCS systems, including the automatic pressure relief subsystem (ADS), be demonstrated operable immediately and daily thereafter when it is determined that HPCI is inoperable. The change requested is to delete the daily requirement to demonstrate that each ADS valve operates for the remaining six days in which the unit may operated with HPCI inoperable. The attachment to this

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letter provides our proposed change, which is essentially identical to the change authorized by Amendment 65 to Dresden Unit 2 Provisional Operating License DPR-19 (Reference (b)) under similar circumstances.

As required by Specification 4.5.C.2, the ADS system was demonstrated to be operable on November 22, 1981 by successfully opening and closing each automatic pressure relief valve individually.

Commonwealth Edison On-Site and Off-Site Review have reviewed and approved this change, and have concluded that this change will result in increased margins of safety. Since each valve was demonstrated operable on November 22, 1981, subsequent daily valve cycling will provide little added assurance that the valves will open on demand. The primary effect of subsequent daily testing will be to increase the likelihood that one of the valves will stick open, thereby subjecting the unit to an undesirable pressure reduction transient.

It should also be noted that current BWR Standard Technical Specifications do not require the daily opening and closing of ADS valves in comparable situations.

Commonwealth Edison has determined that this proposed amendment is a Class III Amendment per 10 CFR 170.22. As such, Commonwealth Edison has enclosed a fee remittance in the amount of \$4,000.00 for this amendment. We have determined that this change involves a single safety issue that does not involve a significant hazards consideration. Since Reference (a) requested the identical change for Unit 2, please review this request for any fee reduction which may apply.

Please address any questions you may have concerning this matter to this office.

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

Very truly yours,

*Thomas J. Rausch*

Thomas J. Rausch  
Nuclear Licensing Administrator  
Boiling Water Reactors

Enclosure

cc: RIII Inspector - Dresden

SUBSCRIBED and SWORN to  
before me this 23rd  
day of November, 1981

*Rosalia A. Punta*

Notary Public

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