



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

February 17, 1982

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



Subject: Dresden Units 2 and 3
Supplement to Proposed
Amendment to DPR-19 and DPR-25
Technical Specifications
Implementing Fire Protection
Modifications
NRC Docket Nos. 50-237 and 249

- References (a): R. F. Janecek letter to Director
of Nuclear Reactor Regulation
dated October 21, 1980.
- (b): T. J. Rausch letter to Director
of Nuclear Reactor Regulation
dated June 12, 1981.

Dear Mr. Denton:

In References (a) and (b), Commonwealth Edison proposed to amend Appendix A Technical Specifications to Facility Operating Licenses DPR-19 and DPR-25 for Dresden Units 2 and 3. These amendments were submitted to incorporate Technical Specification requirements which were needed to implement Fire Protection modifications.

Following discussions with your staff, we were requested to further modify this amendment request so that the Limiting Conditions for Operation and Surveillance Requirements were closer to the Standard Technical Specifications. Accordingly, revised proposed changes for Dresden Units 2 and 3 are enclosed in Attachments 1 and 2 to this letter. The entire fire protection section of the Technical Specifications is being submitted (updated with recent amendments defining "operable"), in order to minimize confusion. These proposed changes have received On-site and Off-site review and approval.

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The proposed changes are identical to those requested by your staff in recent telephone conferences, and generally require additional surveillance to be performed on the various fire protection systems. It should be noted that the requirement to cycle each testable valve in the Sprinkler System each operating cycle has not been added to the Technical Specifications. As was discussed in the telephone conferences, the only valves this could apply to in the Dresden 2 and 3 Sprinkler System are the isolation valves, which are already covered by the requirements of Section 4.12.B, "Fire Suppression Water System."

(a) The appropriate 10 CFR 170 fees were provided in Reference

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 use.

Very truly yours,



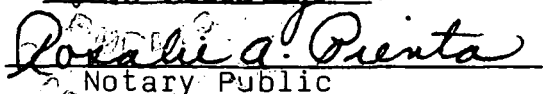
Thomas J. Rausch
Nuclear Licensing Administrator

TJR/lm

Attachments

cc: Region III Inspector - Dresden

SUBSCRIBED and SWORN to
before me this 17th day
of February, 1982



Rosalie A. Puenta
Notary Public