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

March 18, 1982

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 Appendix A
Technical Specifications, to
Operating License DPR-25,
Concerning Scram Discharge Volume
Modifications
NRC Docket No. 50-249

References (a): D. G. Eisenhut letter to All Operating BWRs dated July 7, 1980.

(b): R. Janecek letter to Director of NRR dated October 14, 1980.

(c): T. A. Ippolito letter to L. DelGeorge dated September 2, 1981.

(d): T. Rausch letter to T. A. Ippolito dated October 22, 1980.

(e): D. G. Eisenhut letter to All BWR Licensees dated October 1, 1980.

(f): D. G. Eisenhut letter to All BWR Licensees dated December 9, 1980. (Generic SER Transmittal)

(g): R. Janecek letter to D. G. Eisenhut dated January 15, 1981.

Dear Mr. Denton:

As requested in Reference (a), Commonwealth Edison proposed to amend the Dresden Units 2 and 3 and Quad Cities Units 1 and 2 Technical Specifications in Reference (b) to add LCO and Surveillance requirements pertaining to the Scram Discharge Volume (SDV) system vent and drain valves and control rod block limit switches. Reference (d) provided our response to Reference (c) questions concerning this submittal.

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In response to the Reference (e) request and in consideration of the NRC Generic Safety Evaluation Report on the BWR Scram Discharge System transmittal by Reference (f), Commonwealth Edison indicated in Reference (g) that long term design modifications would be made to the Scram Discharge systems. These modifications are being implemented at Dresden Unit 3 in the current refueling outage.

Because the SDV Instrument Volumes (IVs) have been completely redesigned with (1) improved communication between the SDV headers and the IVs, (2) diverse and redundant water level instrumentation, and (3) improved vent and drain line functions, changes to our Reference (b) amendment request are necessary for Dresden 3. Accordingly, revised Technical Specifications changes to the Dresden Unit 3 operating license DPR-25 are provided in Attachment A to this letter. These changes have received On-site and Off-site review and approval.

Included in the changes are trip level setpoints and operability requirements for the new water level instrumentation and revised associated surveillance and calibration frequencies. These changes have been discussed in detail with the Dresden Unit 3 NRC Project Manager. A physical inspection of the float devices during functional testing is not practical because the devices are enclosed. The use of a water column to actuate these switches during functional testing provides complete assurance that the float devices actuate as designed.

To enhance your review, a complete description of how the modified SDV system meets the NRC Reference (f) Safety Evaluation Report Safety, Operational, and Design Criteria has been provided in Attachment B.

This system employs safety related Magnetrol float type water level switches and ITT Barton differential pressure water level transmitters used in conjunction with Rochester Instrument Systems current/voltage alarms. It should be noted that ITT Barton transmitters and Rochester Instrument Systems current/voltage alarms are currently undergoing environmental and seismic qualification testing. Due to equipment availability, it was impossible to obtain environmentally and seismically qualified equipment in the required time frame. Pending test results, any installed equipment failing the required testing will be replaced with the qualified equipment.

The required 10 CFR 170 fees were provided in Reference (b).

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

Thomas J. Rausch
Nuclear Licensing Administrator

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cc: Region III Inspector - Dresden

SUBSCRIBED and SWORN to
before me this 18th day
of March, 1982

Rosalie A. Prieta
Notary Public

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