



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

March 31, 1982

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

Subject: Dresden Station Units 2 and 3
 Quad Cities Station Units 1 and 2
 Proposed Amendment to Technical
 Specifications Concerning 10 CFR 50,
 Appendix H - Metal Surveillance
 Capsule Program and Appendix G -
 Minimum Temperature Requirements
 NRC Docket Nos. 50-237/249 and
 50-254/265



Dear Mr. Denton:

Pursuant to 10 CFR 50.59, Commonwealth Edison proposes to amend Appendix A, Technical Specifications, to Operating Licenses DPR-19, DPR-25, DPR-29 and DPR-30 for Dresden Units 2 and 3 and Quad Cities Units 1 and 2, respectively. The purpose of this change is to incorporate a 16 Effective Full-Power Year (EFPY) sample into Technical Specification Table 4.6.2 for the four units and to revise the expiration date of the Figure 3.6.1, Appendix G minimum temperature requirements.

Because of the jet pump water gap inherent in BWR 3's, the end of life fluence levels for the Dresden Units 2 and 3 and Quad Cities Units 1 and 2 Reactor Pressure Vessels (RPVs) are very small. Consequently, no significant shift in the transition temperature due to irradiation damage in the RPV steel or weld material is expected at end of life. The present Metal Surveillance Capsule withdrawal schedule of Table 4.6.2 is, therefore, being revised to require a 16 EFPY sample to be withdrawn, which is the earliest point at which meaningful wall-sample data could be obtained.

At this time, the Figure 3.6.1 minimum temperature curves for Dresden Units 2 and 3 and Quad Cities Units 1 and 2 are based upon 10 CFR 50, Appendix G stress analyses of discontinuity regions away from the vessel beltline which are not affected by fluence. Beltline materials are not expected to cause a significant shift in these curves until well beyond 6 EFPY. The regulatory Guide 1.99 reference temperature adjustment curves which implement the Appendix G pressure-temperature requirements begin at $2 \times 10^{17} n/cm^2$ fluence (E 1 Mev). Our best estimate of the 1/4T vessel fluence for the Dresden 2/3 and Quad Cities 1/2 reactors indicates that we will not reach this Regulatory Guide 1.99 initial fluence value until after 10 EFPY.

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In addition, the first Appendix H capsule data from the Dresden and Quad Cities metal surveillance programs will become available during 1982 and 1983. These results will provide actual shifts in RTNDT instead of using trend curves. Accordingly, the proposed change to Technical Specification Section 3.6.B.1 requires that new curves be submitted, incorporating the surveillance capsule test data, at least 6 months prior to 10 EFPY.

Attachments A and B contain the page changes proposed for Dresden and Quad Cities Station, respectively. These changes have received on-site and off-site review and approval.

Pursuant to 10 CFR 170, Commonwealth Edison has reviewed the proposed changes and determined that they consist of two (2) Class III and two (2) Class I amendments. As such a fee remittance in the amount of \$8,800 has been provided.

Three (3) signed originals and fifty-seven (57) copies of this transmittal are provided for your use.

If you have any questions on this matter, please contact this office.

Very truly yours,

Thomas J. Rausch

Thomas J. Rausch
Nuclear Licensing Administrator
Boiling Water Reactors

cc: Region III Inspector - Dresden
Region III Inspector - Quad Cities

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SUBSCRIBED and SWORN to
before me this 31st day
of March, 1982

Rosalie A. Penta
Notary Public