



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

June 17, 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 Changes to License DPR-19,
 25, 29 and 30 Concerning the
 Applicability of the Technical
 Specifications in an Emergency
NRC Docket Nos. 50-237/249 and 50-254/265

Dear Mr. Denton:

Pursuant to 10 CFR 50.59, Commonwealth Edison proposes to amend the Provisional Operating License DPR-19 and Facility Operating Licenses DPR-25, 29 and 30 for Dresden Station Units 2 and 3 and Quad Cities Station Units 1 and 2, respectively. The purpose of this change is to clarify the responsibilities of the licensees during emergencies to take actions necessary to protect public health and safety, even though such action may not be in full accord with some provisions of the Technical Specifications.

We understand through informal communications with your staff that the NRC agrees that there should be specific provisions in the Commission rules or in the Technical Specifications clearly indicating that the Technical Specifications are not intended to restrict or prohibit the licensee from undertaking, during the course of unanticipated emergency conditions, any action necessary to protect public health and safety. While Commission action on such a proposed rule may be pending, Commonwealth Edison believes that the applicability of the Technical Specifications should be clarified as soon as possible.

Accordingly, we propose that paragraph 3.B of License Nos. DPR-19, 25, 29 and 30 be revised as follows:

B. Technical Specifications

The Technical Specifications contained in Appendices A.... as revised through Amendment No. _____ are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

*A001
w/check:
3200.00*

8206240425 820617
 PDR ADOCK 05000237
 PDR

1. The provisions of these technical specifications shall not be deemed to restrict or prohibit the licensee during the course of unanticipated emergency conditions, as defined in paragraph (2) below, from undertaking any action necessary to protect public health and safety. The licensee shall notify NRC; through the emergency communication system between NRC and the facility control room or the technical support center, either (i) before taking such action, or (ii) if conditions are such that immediate action is necessary, at the earliest possible opportunity following such action.
2. "Unanticipated emergency conditions" as used in this section means conditions arising from unanticipated events which are outside the range of conditions considered in the provisions of the Technical Specifications, and which seriously threaten to cause harm to public health and safety.

This change has received Onsite and Offsite review and approval.

Because this wording is very similar to that being considered by the staff for a proposed rule, and because this change merely formalizes an implicit understanding, we believe that this amendment request is of an administrative nature. As such, pursuant to 10 CFR 170, this consists of two combined Class I and Class III amendments. A fee remittance of \$3,200.00 is attached.

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

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

Very truly yours,

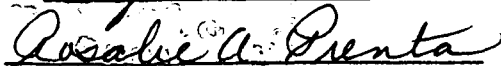


Thomas J. Rausch
Nuclear Licensing Administrator

lm

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

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


 Notary Public