



**Commonwealth Edison**  
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February 17, 1983

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  
Proposed Technical Specification  
Changes Concerning Administrative  
Controls  
NRC Docket Nos. 50-237 and 50-249

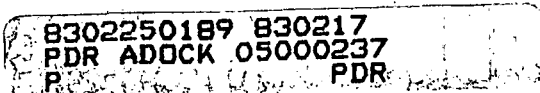
- References (a): D. B. Vassallo letter to L. O. DelGeorge dated May 5, 1982.
- (b): D. G. Eisenhower letter to All Licensees dated June 15, 1982. (Generic Letter 82-12)
- (c): W. F. Naughton letter to D. G. Eisenhower dated August 1, 1980.
- (d): D. G. Eisenhower letter to All Licensees dated October 1, 1982. (Generic Letter 82-17)
- (e): D. G. Eisenhower letter to All Licensees dated October 30, 1982. (Generic Letter 82-23)

Dear Mr. Denton:

Pursuant to 10 CFR 50.59, Commonwealth Edison proposes to amend Appendix A, Technical Specifications to Provisional Operating License DPR-19 and Facility Operating License DPR-25 for Dresden Units 2 and 3, respectively. These amendments incorporate numerous miscellaneous changes to section 6 of the Technical Specifications which pertain to administrative controls.

The majority of the changes reflect changes made in the corporate and station organizations as summarized below:

- (1) Division Manager Nuclear Stations is revised to Division Vice President Nuclear Stations (Numerous T.S. locations)
- (2) Title of Administrative Assistant is revised to Administrative and Support Services Assistant Superintendent (T.S. 6.1.D)
- (3) Reference to "Radiation Protection Manager" as the title of the position which the Rad-Chem Supervisor must meet (T.S. 6.1.D)



*Approval w/check  
3/40 \$1,600*

- (4) Add "Executive" to the title of the Vice President (Construction, Production and Engineering) (T.S. 6.1.G.1.a, 6.1.G.1.b.9)
- (5) Change Maintenance Engineer to Maintenance Assistant Superintendent (T.S. 6.2.C.1 and 6.2.C.2)
- (6) The Director of Nuclear Safety reports to the Chairman and President and he (a) appoints the supervisor of Offsite Review and Investigative Function and (b) has authority to order unit shutdown (T.S. 6.1.G.1 and 6.1.G.1.C)

A revised corporate and stations organization chart is now provided in one figure, Figure 6.1.1. The shift manning chart is provided as Figure 6.1.2 which now reflects the requirements of NUREG 0737 item I.A.1.3 to have a Licensed Senior Operator in the Control Room when one or more units is above cold shutdown. In addition, section 6.2.A is being revised to require procedures for the control of overtime for the Shift Engineer, Station Control Room Engineer, Shift Foreman, and Nuclear Station Operator job classifications. This change is being made in response to the Reference (b) request (Generic Letter 82-12) which is also related to NUREG 0737 item I.A.1.3.

Paragraph 6.1.F is also being revised to clarify the applicability of the requirement to conduct retraining at two year intervals. This change should alleviate concerns raised in the recent Region III Dresden Management Audit, and is consistent with our Reference (c) commitments.

Technical Specification paragraph 6.2.E now more appropriately specifies that emergency procedure drills shall be conducted at the frequency specified in the Generating Stations Emergency Plan (GSEP). This will bring the station practice into accord with NUREG 0654, Revision 1.

In response to Generic Letters 82-17 and 82-23 (References (d) and (e)), paragraphs 6.1.G.1.b(5) and (6) are being revised to require audits of the Facility Emergency Plan and Facility Security Plan at least once per 12 months.

The proposed changes, which have received On-Site and Off-Site review and approval, are provided in the attachment to this letter.

We have reviewed 10 CFR 170 and have determined that this request constitutes a combined Class I and Class II request. As such, a fee remittance of \$1600 is enclosed.

H. R. Denton

- 3 -

February 17, 1983

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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Attachment

cc: Region III Inspector - Dresden

SUBSCRIBED and SWORN to  
before me this 17th day  
of February, 1983.

Rosalie A. Puenta  
Notary Public

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