



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

June 13, 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 Amendment to Technical  
Specifications for Facility Operating  
Licenses DPR-19 and DPR-25 concerning  
Operability Requirements for Snubbers  
NRC Docket Nos. 50-237 and 50-249

- Reference (a): D. L. Peoples to Director of Nuclear  
Reactor Regulation letter dated  
January 4, 1980.
- (b): T. A. Ippolito letter to D. L.  
Peoples dated February 1, 1980.
- (c): B. Rybak letter to H. R. Denton  
dated June 7, 1983.

Dear Mr. Denton:

Pursuant to 10 CFR 50.59, Commonwealth Edison Co. proposes to amend Appendix A, Technical Specifications, to Facility Operating Licenses DPR-19 and DPR-25 for Dresden Units 2 and 3, respectively. The proposed changes would allow extended time limits for the inoperability of the ECCS ring header snubbers. Also, for Unit 3 only, we are updating Tables 3.6.1.a and b to reflect changes in the type of snubbers (mechanical or hydraulic) installed. This amendment request, therefore, supercedes our submittal of June 7th, Reference (c).

The proposed changes are required to complete the construction work for the Mark I containment modifications. The work to be performed requires changing the existing 20 kip hydraulic snubbers to 35 kip mechanical units. A similiar request to extend inoperability limits on these snubbers was made in 1980 ( Reference a ) and issued as Amendments 47 & 41 to Units 2 & 3 respectively per Reference (b).

The analysis used in the forementioned Amendment is also applicable in this case. This analysis indicates that with all six (6) pairs of snubbers removed, stresses remain below code allowable values for the normal operating plus operating basis earthquake (OBE) loads. To remain conservative, the proposed specification would allow only three (3) of six (6) pairs or 1 from each snubber pair to be inoperable at anytime.

The proposed Technical Specifications changes are enclosed in Attachments 1 and 2 for Dresden Units 2 and 3, respectively.

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We have also enclosed as Attachments 3 and 4 final versions of Tables 3.6.1.a and 3.6.1.b. Commonwealth Edison requests that you also review these changes and issue them after the work is completed.

The Mark I completion date for Dresden Unit 2 is June 30, 1983; for Unit 3 the date is December 30, 1983. Therefore, we request the period of the amendment for Unit 2 to be effective ninety days after its approval. For Unit 3, the period should extend to December 30, 1983 or ninety days after approval, whichever is later. We have reviewed the amendment request and find no significant hazards consideration exists, in accordance with 50.92. Our review is documented in Attachment 5.

These changes have received On-Site and Off-Site review and approval.

Pursuant to 10 CFR 170, Commonwealth Edison Co. has review these changes and determined them to be one Class III and one Class I amendment. As such, a fee remittance in the amount of \$4,400.00 is required. However, as this amendment request completely supercedes our June 7, 1983 request, we have adjusted the fee to \$3,200.00.

Commonwealth Edison is notifying the State of Illinois of our request for these amendments by transmittal of a copy of this letter and its attachments.

Please direct any questions on this matter to this office.

Three (3) signed originals and thirty seven (37) copies of this letter and its attachments are provided for your use.

Very truly yours,



B. Rybak  
Nuclear Licensing Administrator

bg/lm

Attachments

cc: R. Gilbert - Nuclear Regulatory Commission  
Region III Inspector - Dresden  
G. N. Wright (Illinois)

Subscribed and Sworn to  
before me this 13<sup>th</sup> day  
of June, 1983

Nancy M. Dascenzo  
Notary Public