

ATTACHMENT 1

Dresden Station Unit 3

Proposed Changes to Appendix A

Technical Specifications to Operating License DPR-25

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1.2 SAFETY LIMIT

1.2 REACTOR COOLANT SYSTEM

Applicability:

Applies to limits on reactor coolant system pressure.

Objective:

To establish a limit below which the integrity of the reactor coolant system is not threatened due to an overpressure condition.

Specification:

The reactor coolant system pressure shall not exceed 1345 psig at any time when irradiated fuel is present in the reactor vessel.

2.2 LIMITING SAFETY SYSTEM SETTING

2.2 REACTOR COOLANT SYSTEM

Applicability:

Applies to trip settings of the instruments and devices which are provided to prevent the reactor system safety limits from being exceeded.

Objective:

To define the level of the process variables at which automatic protective action is initiated to prevent the safety limits from being exceeded.

Specification:

- A. Reactor Coolant High Pressure Scram shall be  $\leq 1060$  psig.
- B. Primary System Safety Valve Nominal Settings shall be as follows:
  - 1 valve at 1135 psig\*
  - 2 valves at 1240 psig
  - 2 valves at 1250 psig
  - 2 valves at 1260 psig
  - 2 valves at 1260 psig

The allowable setpoint error for each valve shall be  $\pm 1\%$ .

\*Target Rock combination safety/relief valve.

### 3.6 LIMITING CONDITION FOR OPERATION

an orderly shutdown shall be initiated and the reactor shall be in a cold shutdown condition with 24 hours.

2. The primary containment sump sampling system and air sampling system shall be operable during power operation. If either a sump water sample or a containment air sample cannot be obtained for any reason, reactor operation is permissible only during the succeeding seven days unless the system is made operable during this period.

#### E. Safety and Relief Valves

1. During reactor power operating conditions and whenever the reactor coolant pressure is greater than 90 psig and temperature greater than 320°F, all nine of the safety valves shall be operable. The solenoid activated pressure valves shall be operable as required by Specification 3.5.D.
2. If specification 3.6.E.1 is not met, an orderly shutdown shall be initiated and the reactor coolant pressure and temperature shall be  $\leq 90$  psig and  $\leq 320^\circ\text{F}$  within 24 hours.

### 4.6 SURVEILLANCE REQUIREMENT

2. The primary containment sump sampling and air sampling system operability will be observed as part of 4.6.0.2.

#### E. Safety and Relief Valves

A minimum of 1/2 of all safety valves shall be bench checked or replaced with a bench checked valve each refueling outage. The popping point of the safety valves shall be set as follows:

<u>Number of Valves</u>	<u>Set Point (psig)</u>
1	1135
2	1240
2	1250
2	1260
2	1260

The allowable setpoint error for each valve is  $\pm 1\%$ .

All relief valves shall be checked for set pressure each refueling outage. The set pressures shall be:

<u>Valve No.</u>	<u>Set Point (psig)</u>
203-3A	1124*
203-3B	1101
203-3C	1101
203-3D	1124
203-3E	1124

\* Target Rock combination safety/relief valve

The allowable setpoint error for each valve is  $\pm 1\%$ .

ATTACHMENT 2

EVALUATION OF SIGNIFICANT HAZARDS CONSIDERATION

Our review of the proposed amendment finds it, when measured against the standards of 10 CFR 50.92, involve no significant hazards consideration. Under 50.92 this means that the proposed amendment does not: (1) Involve a significant increase in the probability or consequences of an accident previously evaluated; or (2) create the possibility of a new or different kind of accident from any accident previously evaluated; or (3) involve a significant reduction in the margin of safety.

The Commission itself has provided further guidance concerning the application of these standards by providing certain examples (48 FR 14871) from which no significant hazards consideration can be made. One such example, although related to reload amendments, is clearly applicable here. That example allows for a determination of no significant hazards consideration where no significant changes are made to the criteria of the technical specifications, the analytical methods used to demonstrate conformance with the technical specifications and regulations are not significantly changed and that the NRC has previously found such methods acceptable. The required licensing analyses for the upcoming Cycle 9, using analytical methods previously approved by the Commission, were performed with the proposed relief valve setpoints. The results of these analyses were found to comply fully with and to be conservatively bounded by the current provisions of its licenses and appendices with no significant effect on any safety margin.

Furthermore, based on a finding by the NRC of no significant hazards consideration for a similar amendment made on a sister unit at the same facility (Dresden Station Unit 2 - Amendment 75 to DPR-19, dated April 7, 1983) we believe that a precedence exists for a identical conclusion in this case.

Therefore, when reviewed against the criteria of 10 CFR 50.92, reviewed against a specific example provided by the Commission and when reviewed against a similar request for an identical unit at the same facility we propose a determination of no significant hazards consideration be made.