



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

February 10, 1984

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

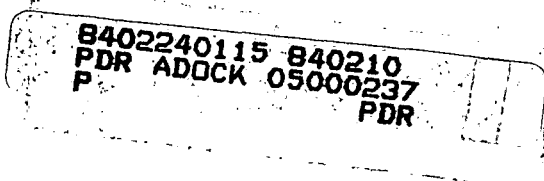
Subject: Dresden Station Units 2 and 3
Proposed Amendment to Technical
Specification for Facility Operating
License Nos. DPR-19 and DPR-25
125/250 Volt Batteries and Reactor
Coolant Iodine Limits
NRC Docket Nos. 50-237 and 50-249

Dear Mr. Denton:

Pursuant to 10 CFR 50.59, Commonwealth Edison proposes to amend Appendix A, Technical Specification, to Facility Operating License Nos. DPR-19 and DPR-25. These changes are made on the basis of a series of discussions with your staff and are required for resolution of Systematic Evaluation Program (SEP) Topics VI-7.C.1 and XV-16. These changes encompass revisions to several Limiting Conditions of Operations (LCO's) and surveillance requirements regarding the 125/250 volt batteries and iodine limits in the reactor coolant. Also, some administrative changes are included. A description of each change is enclosed in Attachment 1.

The proposed changes are enclosed in Attachment 2. The attached change has been received both Onsite and Offsite review and approval. We have reviewed this amendment request and find that no significant hazards consideration exists. Our review is documented in Attachment 3. Commonwealth Edison is notifying the State of Illinois of our request of this amendment by transmittal of a copy of this letter and its attachments to the designated State Official.

We have determined that this request is a 10 CFR 170, Class I and Class III amendment request. As such a fee remittance of \$4,400 is enclosed.



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3/40 w/check \$4,400
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H. R. Denton


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

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

Very truly yours,



B. Rybak
Nuclear Licensing Administrator

lm

cc: Region III Inspector - Dresden
R. Gilbert - NRR
G. Wright

Attachments (1): Description of Proposed Amendment Change
(2): Technical Specification Changes to DPR-19 and 25
(3): Evaluation of Significant Hazards Consideration

SUBSCRIBED AND SWORN to
before me this 14th day
of February, 1984


Notary Public

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ATTACHMENT 1

Detail Description of the Proposed Changes

The proposed changes to DPR-19 and 25 for the 125 volt and 250 volt batteries are as follows:

- 1) The limiting condition of operation (3.9.B.3) for a inoperable 125/250 volt battery has been changed to require that a Unit shutdown be commenced within 2 hours and placed within cold shutdown within 24 hours.
- 2) Additional LCO (3.9.B.4) has been added to stipulate the length of time a battery may be removed from service for maintenance and testing.
- 3) The Bases for Section 3.9.B has been updated to define an inoperable battery. The number of battery chargers available for service has been updated to reflect recent modifications.
- 4) The Surveillance Requirements for the batteries (4.9.A.1) is also changed to require only taking the temperature of the pilot cell and not the adjacent cells. This change is considered a purely administrative change in the sense that it clarifies the requirement of taking the temperature for the pilot cells securely within the regulatory requirements e.g., within the requirements of the Standard Technical Specifications and IEEE standards.
- 5) Surveillance Requirements 4.9.A.3 was revised to require testing the Units batteries.

Change in the LCO to 24 hours when a battery is found or made inoperable is based on the GE BWR standard technical specifications and is a resolution of SEP topic (VI.7.C.1). Additional discussions with the NRC allows us to provide for a period of time for maintenance, testing, and, if necessary, replacement of the batteries. The changes to Bases (3.9.B) was revised to reflect the addition of a battery charger for the 125 volt DC system and to state when the battery becomes inoperable. As for Section 4.9.A.3 wording has been standardized between Unit 2 and 3 technical specifications with the intent to test the respective units battery during its refueling outage. All these changes constitute an additional limitation, restriction or control not presently included in this specification or are changes which would consider administrative.

Pursuant to resolution of set topic XV-16, Dresden Station requests a change to operating Licenses DPR-19 and DPR-25. The changes are as follows:

- 1) LCO 3.6.C.1, is revised to change the reactor coolant activity to a I-131 dose equivalent value, consistent with the Standard Technical Specification, versus a existing limit of 20 microcurries per ml of water total iodine. The NRC concern is that the composition of iodine may vary with each individual isotopic and a limit based on I-131 dose equivalent values is a more pertinent limit. The LCO action limit requires that a shutdown be initiated within 12 hours.
- 2) Surveillance requirement 4.6.C.1.c was revised to require additional isotopic analysis whenever reactor coolant activity exceeded 0.4 microcuries of iodine (I-131 dose equivalent) per ml of water.

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ATTACHMENT 2

Proposed Change to Appendix A
Technical Specifications to
Operating License DPR-19 and 25

DPR-19

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DPR-25

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