

ATTACHMENT 4

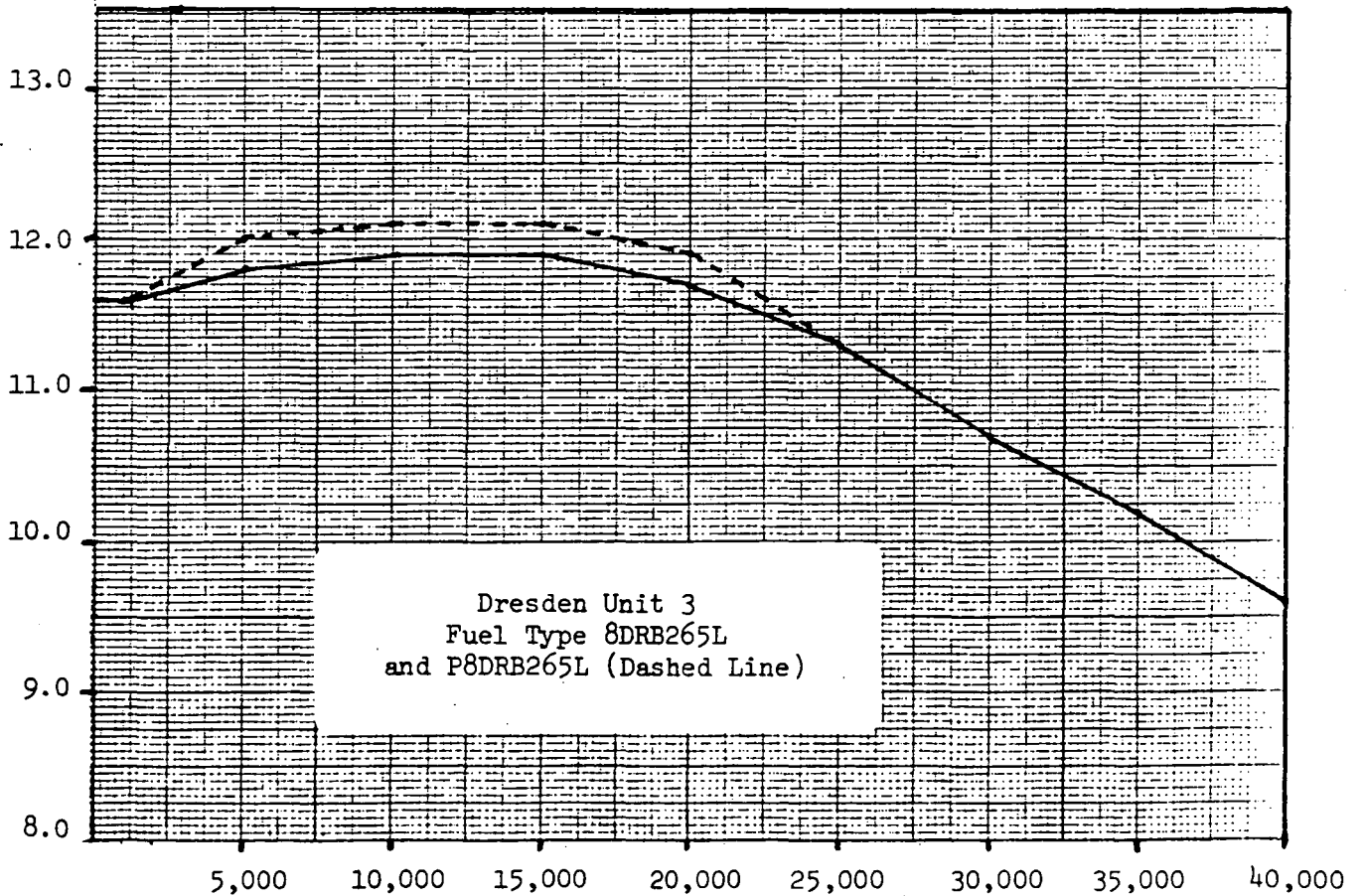
Proposed Change to Appendix A
Technical Specifications to
Operating License DPR- 25

Revised page: Sheet 2 of 5 of Figure 3.5-1

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MAXIMUM AVERAGE PLANAR LINEAR HEAT
GENERATION RATE (KW/FT)



Dresden Unit 3
Fuel Type 8DRB265L
and P8DRB265L (Dashed Line)

PLANAR AVERAGE EXPOSURE (MWd/ST)
MAXIMUM AVERAGE PLANAR LINEAR HEAT GENERATION RATE (MAPLHGR)

VERSUS PLANAR AVERAGE EXPOSURE
Sheet 2 of 5 of Figure 3.5-1

ATTACHMENT 5

Evaluation of Significant Hazards Consideration

Description of Amendment Request

Due to an oversight on CECO's part, we overlooked the need to extend MAPLHGR curves from 30,000 to 40,000 MWD/ST for certain fuel types during Dresden Unit 3 Cycle 9. This amendment request reflects these changes.

Basis for Proposed No Significant Hazards Consideration Determination

Commonwealth Edison has evaluated the proposed Technical Specification amendment and determined that it does not represent a significant hazards consideration. Based on the criteria for defining a significant hazards consideration established in 10 CFR 50.92(c), operation of Dresden Unit 3 in accordance with the proposed amendments will not:

- 1) involve a significant increase in the probability or consequences of an accident previously evaluated because:
 - a) the amendments involve restrictions on the reactor power distribution during normal operation which of itself cannot initiate an accident and therefore does not increase the probability of an accident and
 - b) these restrictions on power distribution are based on a reanalysis or re-evaluation of accidents in accordance with NRC approved methods and are specifically provided to ensure that the consequences of accidents (LOCA) remain within the existing accident criteria established for Quad Cities.
- 2) create the possibility of a new or different kind of accident from any accident previously evaluated for the same reason as (1)a. above and
- 3) involve a significant reduction in the margin of safety since the amendments are specifically intended to ensure that the 10 CFR 50.46 ECCS criteria continue to be protected during future operation.

In consideration of the above, Commonwealth Edison expects that NRC approval of these amendments should not be predicated on satisfactory resolution of public comments or intervention as provided for by 10 CFR 50.91(a)(4).