



Commonwealth Edison
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September 21, 1984

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

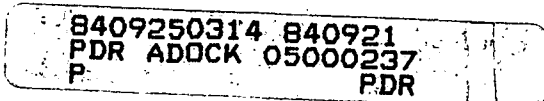
Subject: Dresden Station Units 2 and 3
Amended Request for Technical
Specification Changes to Section
3.6.I Shock Suppressors (Snubbers)
NRC Docket Nos. 50-237 and 50-249

- References (a): B. Rybak letter to H. R. Denton
dated March 15, 1984.
- (b): D. G. Eisenhut letter to All Power
Reactor Licensees dated May 3, 1984.
(Generic Letter 84-13)
- (c): W. A. Paulson letter to D. L. Farrar
dated August 6, 1984.

Dear Mr. Denton:

Pursuant to 10 CFR 50.59, Commonwealth Edison (CECo) requests an amendment to the Technical Specifications, Appendix A, for Dresden Station Units 2 and 3. These proposed changes revise portions of Sections 3.6.I, 4.6.I and the Bases for 3.6.I (Shock Suppressors). Reference (a) has already submitted proposed changes in this area, however, two events since that submittal compels us to revise and resubmit that original amendment application. First, Reference (b) Generic Letter 84-13 provided guidance to all licensees on future revisions to Section 3.6.I and specifically allowed for the deletion of the snubber tables. Second, Amendment numbers 82 and 75 for Units 2 and 3 respectively, reformatted the entire Technical Specifications. Accordingly, this proposed amendment submittal revises our previous request to account for those two events. The major changes to the existing technical specifications are summarized as follows:

1. Deleted Tables 3.6.I.a and 3.6.I.b and all references to them.
2. Revised Sections 3.6.I.2 and 3.6.I.4 and their Bases to remove any reference to the Torus Ring Header Snubber work which already has been completed on both units.
3. Revised Section 4.6.2 and the Bases for Section 3.6.I to remove limits on the type of functional testing performed on the snubbers. Suitable testing fixtures are now available to conduct additional operability tests for the snubbers.



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- 4. Revised Sections 4.6.I.2, 4.6.I.4, and the Bases for 3.6.I to allow for velocity range tests as required by certain types of snubbers. Those types of snubbers were not used at the site until recently.

The proposed changes are enclosed in Attachments A and B. These changes have been received both On-Site and Off-Site review and approval. With this complete revision of our amendment request, we have prepared a new significant hazards review and find that none exists. Our review is documented in Attachment C. Commonwealth Edison is notifying the State of Illinois of this amended request by transmittal of a copy of this letter and its attachments to the designated State Official.

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

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

Very truly yours,



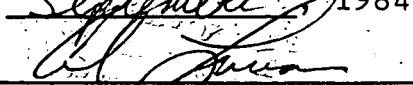
B. Rybak
Nuclear Licensing Administrator

lm

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

Attachments A: Technical Specification Changes to DPR-19
B: Technical Specification Changes to DPR-25
C: Evaluation of Significant Hazards Consideration

SUBSCRIBED AND SWORN to
before me this 21st day
of September 1984


Notary Public