



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

September 28, 1984

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

Subject: Dresden Station Unit 2
 Proposed Amendment to Technical
 Specification for Provisional
 Operating License DPR-19
 Calibration/Functional Test
 Frequency for Analog Trip Units
NRC Docket No. 50-237

- Reference (a): G.E. Licensing Topical Report
 NEDO-21617-A dated December, 1978.
- (b): R. B. Bevan letter to D. L. Farrar
 dated August 2, 1984.

Dear Mr. Denton:

Pursuant to 10 CFR 50.59, Commonwealth Edison proposes to amend Appendix A, Technical Specification, to Provisional Operating License DPR-19. This amendment requests a change in calibration/functional test frequency for specific instrumentation.

During the upcoming Dresden Unit 2 outage certain equipment will be replaced to fully comply with 10 CFR Part 50.49 (Environmental Qualification of Electrical Equipment). The following instrumentation will be modified into analog trip systems:

Reactor Low Water Level Instrument	2-263-57A and B
Reactor Low Water Level Instrument	2-263-58A and B
Reactor Water Level Instrument	2-263-73A and B
HPCI High Steam Flow Instrument	2-2389A through D
HPCI Steam Line Low Pressure Instrument	2-2352 and 2-2353.

The analog trip system consists of an analog sensor (transmitter) and a master/slave trip unit setup which ultimately drives a trip relay. The frequency of calibration and functional testing for instrument loops of the new analog trip system is based on the recommendations in Licensing Topical Report NEDO-21617-A (December, 1978). As established in NEDO-12617-A, each unit is subjected to a calibration/functional test of one month and the proper calibration/surveillance test interval for the transmitter is once per operating cycle. The only material change that exists with this amendment is that the channel calibration will be performed at the transmitter once per operating cycle. This calibration frequency has been found acceptable by the NRC and approved for use at a sister unit, Quad Cities Unit 1. per Reference (b).

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A summary of the proposed change is enclosed in Attachment 1. The change itself can be found in Attachment 2 and has 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.

In accordance with 10 CFR 170, a fee remittance of \$150.00 is enclosed. This change will be required at the time of Unit 2's startup from the upcoming current refueling outage. The expected startup is currently scheduled for late December. Therefore, your prompt review and approval is requested.

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

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

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

SUBSCRIBED and SWORN to
before me this 28th day
of September, 1984


Notary Public

ATTACHMENT 1

Summary of Proposed Changes

Technical Specification pages involved are:

Table 4.1.1, page 3/4.1-8	The Reactor Low Water Level instrumentation is being changed from Group A to Group B and its functional test is per the newly added Note No. 8 on page 3/4.1-9.
page 3/4.1-9	Added Note 8.
Table 4.1.2, page 3/4.1-19	The Reactor Low Water Level instrumentation is being changed from Group A to Group B and its minimal testing frequency is changed from every 3 months to the newly added Note No. 5.
Bases, page 3/4.1-19	A discussion of the analog trip system is added.
page 3/4.1-20	Changed to accept words from 3/4.1-19, resulting from analog description insertion.
Table 4.2.1, page 3/4.2-17	Changed the instrument functional test and calibration frequency from once/3 months by referencing the newly added Note No. 12.
	Changed the HPCI Steam Line High Flow and Low Reactor pressure functional and calibration frequencies by addition of Note No. 12.
Bases, page 3/4.2-19	Added Note No. 12.
page B 3/4.2-32	Added discussion of analog trip system.
page B 3/4.2-33	Added overflow from page B 3/4.2-22 due to analog description.