



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

September 27, 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 Scram  
Discharge Volume System Modifications  
NRC Docket No. 50-237

Reference (a): V. Stello, Jr. letter to Cordell Reed  
dated October 2, 1980.

(b): D. M. Crutchfield letter to D. L. Farrar  
dated June 24, 1983 (Confirmatory Order -  
BWR Scram Discharge System).

Dear Mr. Denton:

Pursuant to 10 CFR 50.59, Commonwealth Edison proposes to amend Appendix A, Technical Specification (TS), to Provisional Operating License DPR-19 for Dresden Unit 2. This proposed change is necessitated by significant modifications to the Scram Discharge Volume (SDV) to be performed on Unit 2 during the upcoming Fall, 1984 outage.

A Generic Safety Evaluation for this proposed modification of the scram discharge system, issued December 10, 1980, endorsed the criteria set forth by the BWR Owners Subgroup to meet the concerns arising from the Browns Ferry incomplete scram event of July, 1980. By Reference (b) a Confirmatory Order acknowledging Commonwealth Edison's commitment to modify its scram discharge system in response to these concerns was issued. Also, model Technical Specifications were forwarded to us as guidance for revising the TS for operation with the proposed modification of the SDV system. We feel that the TS changes proposed in this submittal are fully responsive to the concerns addressed in the Generic Safety Evaluation on SDV Systems and are keeping with the general guidance provided in the model Technical specifications. Please note that only small differences exist between these proposed changes and those already approved for Unit 3 and that these differences result from small design changes in Unit 2's SDV from that installed on Unit 3.

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A summary of the proposal changes appears in Attachment 1. The proposed change itself is enclosed in Attachment 2. The 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 for this amendment by transmittal of a copy of this letter and its attachments to the designated State Official.

This amendment request is needed prior to Unit 2's return to service from its upcoming refueling outage. The expected startup is currently scheduled for late December, 1984. Therefore, your prompt review and approval is requested. In accordance with 10 CFR 170, a fee remittance of \$150.00 is enclosed.

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,



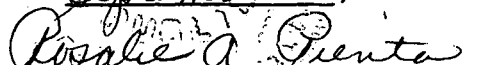
B. Rybak  
Nuclear Licensing Administrator

lm

- Attachments (1): Summary of Proposed Changes due to SDV Modification  
(2): Proposed 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 27th day  
of September, 1984

  
Notary Public

## ATTACHMENT 1

### Summary of Proposed Changes Due to the SDV Modification

The attached changes to Dresden Unit 2 Technical Specifications (DPR-19) are necessitated by significant modifications to the Scram Discharge Volume (SDV) System being accomplished during the upcoming Fall 1984 outage. The changes described in detail below involve surveillance requirements for SDV Rod Block and Scram level switches. Small differences exist between these Technical Specifications and those approved previously for Dresden Unit 3. These differences result from changes in the Unit 2 SDV design from that installed on Unit 3 (e.g. use of a thermal switch on Unit 2 in place of a float switch utilized on Unit 3 and the resulting change in SDV trip level setting to account for the different instrumentation type and volumes - e.g., 40 inches on Unit 2 versus 37.25 inches on Unit 3.

1. Page 3/4.1-5, Table 3.1.1, notes the use of thermal and dp switches and changes the trip level in volume from gallons to inches.
2. Page 3/4.1-8, Table 4.1.1 notes the use of thermal and dp switches.
3. Page 3/4.1-9, discusses how the new thermal switches and dp switches will be calibrated.
4. Page 3/4.1-10, Table 4.1.2, adds water level in SDV to instrument calibration (frequency of once per refueling outage).
5. Page B 3/4.1-12, describes the new system and how it will operate.
6. Page B 3/4.1-20, removes float switches and adds thermal and dp switches.
7. Page 3/4.1-12, Table 3.2.3, adds operable channels per bank and level in volume.
8. Page 3/4.2-13, removes one channel for trip system and adds one instrument for Rod Block per bank.
9. Page 3/4.2-21, (notes for Table 4.2.1), discusses the calibration of the thermal switches.