



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

October 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 Technical Specification
 Change to Incorporate New Equipment
 Installed in Response to Generic
 Letter 83-36
NRC Docket Nos. 50-237 and 50-249

- References (a): D. G. Eisenhut letter to All Boiling
 Water Reactor Licenses dated November 1,
 1983
- (b): P. L. Barnes letter to H. R. Denton
 dated February 9, 1984

Dear Mr. Denton:

Pursuant to 10 CFR 50.59 Commonwealth Edison proposes to
 amend Appendix A, Technical Specification, for Dresden Units 2 and 3
 to address the concerns contained in Generic Letter 83-36 and NUREG
 0737. The enclosed Technical Specification pages comprise our final
 response to the following items:

<u>NUREG-0737 Item</u>	<u>Item Description</u>
II.B.1.	Reactor Coolant System Vents
II.B.3.	Post-Accident Sampling
II.F.1.1.	Noble Gas Effluent Monitors
II.F.1.2.	Iodine & Particulate Monitors
II.F.1.3.	Containment Rad. Monitors
II.F.1.4.	Containment Pressure Monitors
II.F.1.5.	Containment Water Level Mon.
II.F.1.6.	Containment Hydrogen Monitors
III.D.3.4.	Control Room Habitability

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For some TMI items, Commonwealth Edison believes no Technical Specifications are needed. For others, appropriate changes were already submitted as part of our Radiological Effluent Technical Specification submittal. For the remaining TMI items Limiting Conditions for Operation and Surveillance Requirements are proposed based on the general guidance provided in Enclosure 3 of the Generic Letter and the specifications already existing for similar equipment in our Technical Specifications. A general breakdown of these changes are listed in Attachment 1.

The proposed changes (Attachments 2 and 3) have received On-site and Off-site review and approval. We have reviewed these amendment requests and find that no significant hazard consideration exists. Our review is documented in Attachment 4.

Pursuant to 10 CFR 170, a fee remittance of \$150.00 has been enclosed.

Commonwealth Edison is notifying the State of Illinois of our request for these amendments by transmittal of a copy of this letter and its attachments to the designated State Official.

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

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

Very truly yours,



B. Rybak
Nuclear Licensing Administrator

lm.

Attachments

cc: R. Gilbert - NRR
RIII Inspectors - Dresden
G. N. Wright (Illinois)

SUBSCRIBED and SWORN to
before me this 10th day
of October, 1984


Rosalie A. Penta
Notary Public

ATTACHMENT 1

Summary of Technical Specification Changes
Related to Generic Letter 83-36

1) Reactor Coolant System Vents (II.B.1)

This item is not applicable to Dresden Station since the units each have a turbine driven High Pressure Coolant Injection System along with the Isolation Condenser System. Therefore, no Technical Specification changes are required.

2) Post-Accident Sampling (II.B.3)
Noble Gas Effluent Monitors (II.F.1.1)
Sampling and Analysis of Plant Effluents (II.F.1.2)

Appropriate specifications were submitted in our Radiological Effluent Technical Specification application.

3) Containment High-Range Radiation Monitor (II.F.1.3)
Containment Pressure Monitor (II.F.1.4)

The monitors are included in the newly developed post-accident monitoring instrumentation Tables 3.2.4 and 4.2.2 proposed as a result of the Generic Letter. Operability and surveillance requirements are specified based on the general guidance provided in Enclosure 3 of the Generic Letter and specifications for similar instrumentation presently included in the Technical Specifications.

4) Containment Water Level Monitor (II.F.1.5)

The monitors are included in the post-accident monitoring instrumentation Tables 3.2.4 and 4.2.2 which are proposed as a result of the Generic Letter. Operability and surveillance requirements are specified based on the guidance provided in Enclosure 3 and specification for suppression pool level instrumentation presently included in the Technical Specification.

5) Containment Hydrogen Monitor (II.F.1.6)

A drywell Hydrogen Monitoring System has been installed per the requirements of NUREG-0737. Generic Letter 83-36 requires that this system be included in the Technical Specification Tables for post-accident monitoring.

The proposed revision to Table 3.2.6 acknowledges the High Radiation Sample System's gas chromatograph. The gas chromatograph will be used as a back-up, allowing reactor operation for thirty (30) days should both channels of the drywell Hydrogen Monitoring System be inoperable. If both channels of the drywell Hydrogen Monitoring System are inoperable, and the gas chromatograph is not operational, reactor operation is permissible for the succeeding seven (7) days. In the event one monitor cannot be restored to operable status within the seven (7) days, an orderly shutdown shall be initiated pursuant to Technical Specification 3.0.A. The intent of Generic Letter 83-36 is met with the addition of the High Radiation Sample System's gas chromatograph, that is, reactor operation is not permitted past seven (7) days when no method of determining drywell hydrogen concentration is available.

6) Control Room Habitability (II.D.3.4)

Technical Specifications 3.8.I/4.8.I has been added to the installation of the Emergency Filtration System. The testing of the charcoal and filter system utilizes as its bases the LCO and surveillance requirements for the Standby Gas Treatment System. This is comparable to Generic Letter 83-36 recommendations for Technical Specifications. The toxic gas analyzer (one monitor for each gas) LCO differs from the guidelines in Generic Letter 83-36 based on the following reason. Since there is only one monitor available for each gas, each time routine maintenance is performed, the Emergency Filtration System would need to be placed in service. We believe that this item is extremely restrictive and what has been proposed is within reason. A description of the operation of the overall system has been submitted to the NRC in the "Control Room Habitability Study." (E.D. Swartz letter to D.G. Eisenhut, dated December 17, 1981.) The set-points for the ammonia and methyl chloride concentrations are based on early detection in the outside air supply at the odor threshold, so that the toxic chemical will not achieve toxicity limit concentrations in the Control Room. The surveillance requirements for the toxic gas analyzers are based on those given in Generic Letter 83-36.