

ATTACHMENT 1

Summary of Proposed Changes

Radiation monitoring of Aerojet Energy Conversion Company's Mobile Volume Reduction System (MVRS) is addressed in three separate tables of Appendix A to Dresden Station Units 2 and 3 Technical Specifications, namely Table 3.2.5, Radioactive Gaseous Effluent Monitoring Instrumentation; Table 4.2.3, Radioactive Gaseous Effluent Monitoring Instrumentation Surveillance Requirements; and Table 4.8.1, Radioactive Gaseous Waste Sampling and Analysis Program. The changes (additions) to these tables are based on Commonwealth Edison Company's proposed Radiological Effluent Technical Specification (RETS) which has recently received NRC approval. Specific changes to the three tables are described below.

For Table 3.2.5, the action level chosen for failure of a MVRS process exhaust or HVAC exhaust sampler is the most restrictive of six action levels listed. Failure of a sampler requires immediate suspension of radioactive effluents via the HVAC or process exhaust pathway.

The MVRS process and HVAC iodine and particulate sampler instrumentation surveillance for Table 4.2.3 consists of a daily instrument check when the sampler is required to be operable, similar to the existing Reactor Building ventilation and main chimney exhaust iodine and particulate samplers. The instrument check encompasses verification of sampler operability, i.e., if it is in place and functioning properly. Additionally, this surveillance is required prior to use of the MVRS. The sampling frequency is continuous. In the event of a power loss or plugging of the sampler, an alarm will sound in the MVRS Control Room. Calibration and functional testing and source checking are not applicable to the sampler.

For Table 4.8.1 the sampling and analysis frequency program for the MVRS process and HVAC exhaust is patterned after the existing Reactor Building ventilation and main chimney iodine and particulate samplers as was done in Table 3.2.5. Sampler filter media is removed once per week for analysis within 48 hours. The charcoal filter will be analyzed for I-131 and I-133; the particulate filter will be analyzed for principal gamma emitters including I-131. An additional requirement of the MVRS process and HVAC exhaust samplers includes removing the sample filters whenever the MVRS is shutdown a minimum of four hours. Sample analysis is again completed within 48 hours. Lower detection limits for analyzing such samples have also been similarly retained.

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Finally, corrections to the List of Tables was made. The findings contained herein have been determined to be consistent with similar existing gaseous effluent samplers at Dresden Station and therefore pose no unacceptable safety concern. It is therefore requested that the attached Technical Specification change be approved.

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ATTACHMENT 2

Proposed Changes to DPR-19

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TABLE 3.2.5

## RADIOACTIVE GASEOUS EFFLUENT MONITORING INSTRUMENTATION

<u>Minimum No. of Operable Channels (1)</u>	<u>Total No. of Channels</u>	<u>Parameter</u>	<u>Action (2)</u>
1	2	SJAE Radiation Activity Monitor	D
1	3	Main Chimney Noble Gas SPING/GE Low Range Activity Monitor	A
1	1	Main Chimney SPING Noble Gas Monitors Mid, Hi Range	A
1	1	Main Chimney Iodine Sampler	C
1	1	Main Chimney Particulate Sampler	C
1	1	Main Chimney Flow Rate Monitor	B
1	1	Main Chimney Sampler Flow Rate Monitor	B
1	2	Reactor Building Vent Exhaust Duct Radiation Monitor	E
1	1	Reactor Building Vent SPING Noble Gas Monitor Low, Mid, High Range	F
1	1	Reactor Building Vent Flow Rate Monitor	B
1	1	Reactor Building Vent Sampler Flow Rate Monitor	B
1	1	Reactor Building Vent Iodine Sampler	C
1	1	Reactor Building Vent Particulate Sampler	C
1	1	MVRS Process Exhaust Iodine Sampler	E
1	1	MVRS Process Exhaust Particulate Sampler	E
1	1	MVRS HVAC Exhaust Iodine Sampler	E
1	1	MVRS HVAC Exhaust Particulate Sampler	E

Notes:  
(See Next Page)

3/4.2-15

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TABLE 4.2.3  
RADIOACTIVE GASEOUS EFFLUENT MONITORING  
INSTRUMENTATION SURVEILLANCE REQUIREMENTS

<u>Instrument</u>	<u>Instrument Check (1)(6)</u>	<u>Calibration (1)(6)(3)</u>	<u>Function Test (1)(4)(2)(6)</u>	<u>Source Check (1)</u>
SJAE Radiation Activity Monitor	D	R	Q	R
Reactor Bldg Vent Particulate and Iodine Sampler	D (4)	N/A	N/A	N/A
Reactor Bldg Vent Exhaust Duct Radiation Monitor	D	R	Q	Q
Reactor Bldg Vent SPING Noble Gas Monitor Lo, Mid, High Range	D	R	Q	M
Main Chimney Noble Gas Activity Monitor	D	R	Q	M
Main Chimney SPING Noble Gas Monitor Lo, Mid, High Range	D	R	Q	M
Main Chimney Particulate and Iodine Sampler	D (4)	N/A	N/A	N/A
Main Chimney Flow Rate Monitor	D	R	Q	N/A
Main Chimney Sampler Flow Rate Monitor	D	R	Q (5)	N/A
Reactor Bldg Vent Flow Rate Monitor	D	R	Q	N/A
Reactor Bldg Sampler Flow Rate Monitor	D	R	Q (5)	N/A
MVRS Process Exhaust Iodine and Particulate Sampler	D (7)	N/A	N/A	N/A
MVRS HVAC Exhaust Iodine and Particulate Sampler	D (7)	N/A	N/A	N/A

Notes:  
(See Next Page)

TABLE 4.2.3 (Notes)

1. D = Once per 24 hours  
M = Once per 31 days  
Q = Once per 92 days  
R = Once per refueling outage
2. The Instrument Functional Test shall also demonstrate that control room alarm annunciation occurs, if any of the following conditions exist, where applicable.
  - a. Instrument indicates levels above the alarm setpoint.
  - b. Circuit Failure.
  - c. Instrument indicates a downscale failure.
  - d. Instrument controls not set in OPERATE mode.
3. Calibration shall include performance of a functional test.
4. Instrument check to verify operability of sampler; that the sampler is in place and functioning properly.
5. Function Test shall be performed on local switches providing low flow alarm.
6. Function test calibrations and instrument checks are not required when these instruments are not required to be operable or are tripped. Calibration shall be performed once per refueling outage and not more than once every 18 months. Instrument checks shall be performed at least once per day during those periods when the instruments are required to be operable.
7. Instrument check to verify operability of sampler; that the sampler is in place and functioning properly prior to use of the Mobile Volume Reduction System (MVRS).

Table 4.8.1  
RADIOACTIVE GASEOUS WASTE SAMPLING  
AND ANALYSIS PROGRAM

GASEOUS RELEASE TYPE	SAMPLING FREQUENCY (7)	MINIMUM ANALYSIS FREQUENCY (7)	TYPE OF ACTIVITY ANALYSIS	LOWER LIMIT OF DETECTION (LLD) (uCi/ml) (1)
A. Main Chimney Reactor Bldg. Vent Stack	M Grab Sample	M(2)	Principal Gamma Emitters(5)	1 X 10 <sup>-4</sup>
		M	Tritium	1 X 10 <sup>-6</sup>
B. All Release Types as Listed in A above	Continuous(4)	W(3)	I-131	1 X 10 <sup>-12</sup>
		Charcoal Sample	I-133	1 X 10 <sup>-10</sup>
	Continuous(4)	W(3)	Principal Gamma Emitters(5)	1 X 10 <sup>-11</sup>
		Particulate Sample	(I-131, others)	
		Q	Sr-89	1 X 10 <sup>-11</sup>
Continuous(4)	Composite Particulate Sample	Sr-90	1 X 10 <sup>-11</sup>	
	Q	Gross Alpha	1 X 10 <sup>-11</sup>	
C. Main Chimney	Continuous(4)	Noble Gas Monitor	Noble Gases	1 X 10 <sup>-6</sup>
		Noble Gas Monitor	Noble Gases	1 X 10 <sup>-4</sup>
D. Reactor Bldg. Vent Stack	Continuous(4)	Noble Gas Monitor	Noble Gases	1 X 10 <sup>-4</sup>
		Noble Gas Monitor	Noble Gases	1 X 10 <sup>-4</sup>
E. MVES Process Exhaust Sampler	Continuous(4)	W(6)	I-131	1 X 10 <sup>-12</sup>
		Charcoal Sample	I-133	1 X 10 <sup>-10</sup>
F. MVES HVAC Exhaust Sampler	Continuous(4)	W(6)	I-131	1 X 10 <sup>-12</sup>
		Charcoal Sample	I-133	1 X 10 <sup>-10</sup>
F. MVES HVAC Exhaust Sampler	Continuous(4)	W(6)	Principal Gamma Emitters(5)	1 X 10 <sup>-11</sup>
		Particulate Sample	(I-131, others)	



TABLE 4.8.1 (Continued)  
TABLE NOTATION

1. The lower limit of detection (LLD) is defined in notation A of Table 4.8.6.
2. Sampling and analyses shall also be performed following shutdown, startup, or a thermal power change exceeding 20 percent of rated thermal power in 1 hour unless (1) analysis shows that the DOSE EQUIVALENT I-131 concentration in the primary coolant has not increased more than a factor of 5, and (2) the noble gas activity monitor shows that effluent activity has not increased by more than a factor of 3.
3. Samples shall be changed at least once per 7 days and the analyses completed within 48 hours after removal from the sampler. Sampling shall also be performed within 24 hours following each shutdown, startup, or thermal power level change exceeding 20% of rated thermal power in one hour. This requirement does not apply if 1) analysis shows that the DOSE EQUIVALENT I-131 concentration in the primary coolant has not increased more than a factor of 5, and 2) the noble gas activity monitor shows that effluent activity has not increased by more than a factor of 3. When samples collected for 24 hours are analyzed, the corresponding LLD's may be increased by a factor of 10.
4. The ratio of sample flow rate to the sampled stream flow rate shall be known.
5. The principal gamma emitters for which the LLD specification applies exclusively are the following radionuclides: Kr-87, Kr-88, Xe-133, Xe-133m, Xe-135, and Xe-138 for gaseous emissions, and Mn-54, Fe-59, Co-60, Zn-65, Co-58, Mo-99, Cs-134, Cs-137, Ce-141, and Ce-144 for particulate emissions. Other peaks which are measurable and identifiable by gamma ray spectrometry, together with the above nuclides, shall be also identified and reported when an actual analysis is performed on a sample. Nuclides which are below the LLD for the analyses shall not be reported as being present at the LLD level for that nuclide.
6. Samples shall be changed at least once per 7 days or whenever the Mobile Volume Reduction System (MVRS) is shutdown for at least 4 hours and the analyses completed within 48 hours after removal from the sampler.
7. W = once per week  
M = once per 31 days  
Q = once per 92 days

ATTACHMENT 3

Proposed Changes to DPR-25

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Table 3.6.1b	Safety Related Mechanical Snubbers	3/4.6 -20 & 21
Table 4.6.2	Neutron Flux and Sample Withdrawal	B 3/4.6- 30
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Table 3.12-2	Sprinkler Systems	B 3/4.12-18
Table 3.12-3	CO <sub>2</sub> Systems	B 3/4.12-19
Table 3.12-4	Fire Hose Stations	B 3/4.12-20 & 21
Table 6.1.1	Minimum Shift Manning Chart	6 - 5
Table 6.6.1	Special Reports	6 -26

TABLE 3.2.5  
RADIOACTIVE GASEOUS EFFLUENT MONITORING INSTRUMENTATION

<u>Minimum No. of Operable Channels (1)</u>	<u>Total No. of Channels</u>	<u>Parameter</u>	<u>Action (2)</u>
1	2	SJAE Radiation Activity Monitor	D
1	3	Main Chimney Noble Gas SPING/GE Low Range Activity Monitor	A
1	1	Main Chimney SPING Noble Gas Monitors Mid, Hi Range	A
1	1	Main Chimney Iodine Sampler	C
1	1	Main Chimney Particulate Sampler	C
1	1	Main Chimney Flow Rate Monitor	B
1	1	Main Chimney Sampler Flow Rate Monitor	B
1	2	Reactor Building Vent Exhaust Duct Radiation Monitor	E
1	1	Reactor Building Vent SPING Noble Gas Monitor Low, Mid, High Range	F
1	1	Reactor Building Vent Flow Rate Monitor	B
1	1	Reactor Building Vent Sampler Flow Rate Monitor	B
1	1	Reactor Building Vent Iodine Sampler	C
1	1	Reactor Building Vent Particulate Sampler	C
1	1	MVRS Process Exhaust Iodine Sampler	E
1	1	MVRS Process Exhaust Particulate Sampler	E
1	1	MVRS HVAC Exhaust Iodine Sampler	E
1	1	MVRS HVAC Exhaust Particulate Sampler	E

Notes:  
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TABLE 4.2.3

RADIOACTIVE GASEOUS EFFLUENT MONITORING  
INSTRUMENTATION SURVEILLANCE REQUIREMENTS

<u>Instrument</u>	<u>Instrument Check (1)(6)</u>	<u>Calibration (1)(6)(3)</u>	<u>Function Test (1)(4)(2)(6)</u>	<u>Source Check (1)</u>
SJAE Radiation Activity Monitor	D	R	Q	R
Reactor Bldg Vent Particulate and Iodine Sampler	D (4)	N/A	N/A	N/A
Reactor Bldg Vent Exhaust Duct Radiation Monitor	D	R	Q	Q
Reactor Bldg Vent SPING Noble Gas Monitor Lo, Mid, High Range	D	R	Q	M
Main Chimney Noble Gas Activity Monitor	D	R	Q	M
Main Chimney SPING Noble Gas Monitor Lo, Mid, High Range	D	R	Q	M
Main Chimney Particulate and Iodine Sampler	D (4)	N/A	N/A	N/A
Main Chimney Flow Rate Monitor	D	R	Q	N/A
Main Chimney Sampler Flow Rate Monitor	D	R	Q (5)	N/A
Reactor Bldg Vent Flow Rate Monitor	D	R	Q	N/A
Reactor Bldg Sampler Flow Rate Monitor	D	R	Q (5)	N/A
MVRS Process Exhaust Iodine and Particulate Sampler	D(7)	N/A	N/A	N/A
MVRS HVAC Exhaust Iodine and Particulate Sampler	D(7)	N/A	N/A	N/A

Notes:

(See Next Page)

TABLE 4.2.3 (Notes)

1. D = Once per 24 hours  
M = Once per 31 days  
Q = Once per 92 days  
R = Once per refueling outage
2. The Instrument Functional Test shall also demonstrate that control room alarm annunciation occurs, if any of the following conditions exist, where applicable.
  - a. Instrument indicates levels above the alarm setpoint.
  - b. Circuit Failure.
  - c. Instrument indicates a downscale failure.
  - d. Instrument controls not set in OPERATE mode.
3. Calibration shall include performance of a functional test.
4. Instrument check to verify operability of sampler; that the sampler is in place and functioning properly.
5. Function Test shall be performed on local switches providing low flow alarm.
6. Function test calibrations and instrument checks are not required when these instruments are not required to be operable or are tripped. Calibration shall be performed once per refueling outage and not more than once every 18 months. Instrument checks shall be performed at least once per day during those periods when the instruments are required to be operable.
7. Instrument check to verify operability of sampler; that the sampler is in place and functioning properly prior to use of the Mobile Volume Reduction System (MVRS).

Table 4.8.1  
RADIOACTIVE GASEOUS WASTE SAMPLING  
AND ANALYSIS PROGRAM

GASEOUS RELEASE TYPE	SAMPLING FREQUENCY (7)	MINIMUM ANALYSIS FREQUENCY (7)	TYPE OF ACTIVITY ANALYSIS	LOWER LIMIT OF DETECTION (LLD) (uCi/ml) (1)
A. Main Chimney Reactor Bldg. Vent Stack	M Grab Sample	M(2)	Principal Gamma Emitters(5)	1 X 10 <sup>-4</sup>
		M	Tritium	1 X 10 <sup>-6</sup>
B. All Release Types as Listed in A above	Continuous(4)	W(3)	I-131	1 X 10 <sup>-12</sup>
		Charcoal Sample	I-133	1 X 10 <sup>-10</sup>
	Continuous(4)	W(3)	Principal Gamma Emitters(5)	1 X 10 <sup>-11</sup>
		Particulate Sample	(I-131, others)	
		Q	Sr-89	
Continuous(4)	Q	Sr-90	1 X 10 <sup>-11</sup>	
	Composite Particulate Sample	Gross Alpha	1 X 10 <sup>-11</sup>	
C. Main Chimney	Continuous(4)	Noble Gas Monitor	Noble Gases	1 X 10 <sup>-6</sup>
D. Reactor Bldg. Vent Stack	Continuous(4)	Noble Gas Monitor	Noble Gases	1 X 10 <sup>-4</sup>
E. MVRS Process Exhaust Sampler	Continuous(4)	W(6)	I-131	1 X 10 <sup>-12</sup>
		Charcoal Sample	I-133	1 X 10 <sup>-10</sup>
F. MVRS HVAC Exhaust Sampler	Continuous(4)	W(6)	I-131	1 X 10 <sup>-12</sup>
		Charcoal Sample	I-133	1 X 10 <sup>-10</sup>
F. MVRS HVAC Exhaust Sampler	Continuous(4)	W(6)	Principal Gamma Emitters(5)	1 X 10 <sup>-11</sup>
		Particulate Sample	(I-131, others)	

TABLE 4.8.1 (Continued)  
TABLE NOTATION

1. The lower limit of detection (LLD) is defined in notation A of Table 4.8.6.
2. Sampling and analyses shall also be performed following shutdown, startup, or a thermal power change exceeding 20 percent of rated thermal power in 1 hour unless (1) analysis shows that the DOSE EQUIVALENT I-131 concentration in the primary coolant has not increased more than a factor of 5, and (2) the noble gas activity monitor shows that effluent activity has not increased by more than a factor of 3.
3. Samples shall be changed at least once per 7 days and the analyses completed within 48 hours after removal from the sampler. Sampling shall also be performed within 24 hours following each shutdown, startup, or thermal power level change exceeding 20% of rated thermal power in one hour. This requirement does not apply if 1) analysis shows that the DOSE EQUIVALENT I-131 concentration in the primary coolant has not increased more than a factor of 5, and 2) the noble gas activity monitor shows that effluent activity has not increased by more than a factor of 3. When samples collected for 24 hours are analyzed, the corresponding LLD's may be increased by a factor of 10.
4. The ratio of sample flow rate to the sampled stream flow rate shall be known.
5. The principal gamma emitters for which the LLD specification applies exclusively are the following radionuclides: Kr-87, Kr-88, Xe-133, Xe-133m, Xe-135, and Xe-138 for gaseous emissions, and Mn-54, Fe-59, Co-60, Zn-65, Co-58, Mo-99, Cs-134, Cs-137, Ce-141, and Ce-144 for particulate emissions. Other peaks which are measurable and identifiable by gamma ray spectrometry, together with the above nuclides, shall be also identified and reported when an actual analysis is performed on a sample. Nuclides which are below the LLD for the analyses shall not be reported as being present at the LLD level for that nuclide.
6. Samples shall be changed at least once per 7 days or whenever the Mobile Volume Reduction System (MVRS) is shutdown for at least 4 hours and the analyses completed within 48 hours after removal from the sampler.
7. W = once per week  
M = once per 31 days  
Q = once per 92 days



## ATTACHMENT 4

### Evaluation of Significant Hazards Consideration

#### Description of Amendment Request

Use of the MVRS on a generic basis was approved by the NRC by the acceptance of the Licensing Topical Report AECC-4 P/NP, Revision 1. An amendment to the Technical Specifications is requested adding the MVRS radiological effluent monitoring equipment to Tables 3.2.5, 4.2.3 and 4.8.1 to allow use of the equipment at Dresden Station. These Tables identify the surveillance, monitoring and analysis requirements for monitored effluent streams.

#### Basis for Proposed No Significant Hazards Consideration Determination

The Commission has provided guidance concerning the application of the standards for determining whether a significant hazards consideration exists by providing certain examples (48 FR 14870). The examples of actions involving no significant hazards consideration include: "(ii) A change that constitutes an additional limitation, restriction, or control not presently included in the technical specifications; for example, a more stringent surveillance requirement." The changes proposed in the application for amendment are encompassed by this example in that the proposed change would add effluent monitoring equipment to Tables 3.2.5, 4.2.3 and 4.8.1, thereby, defining applicable surveillance, sampling and analysis requirements where no current requirements exist.

Therefore, since the application for amendment involves a proposed change that is similar to an example for which no significant hazards consideration exists, Commonwealth Edison has made a proposed determination that the application involves no significant hazards consideration.