



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

July 31, 1985

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

Subject: Dresden Station Unit 3
Proposed Emergency Technical
Specification Amendment to
Containment Cooling Operability
Requirements
NRC Docket No. 50-249

Dear Mr. Denton:

Pursuant to 10 CFR 50.90, Commonwealth Edison (CECo) proposes an emergency amendment to Appendix A, the Technical Specification, for Operating License DPR-25. The proposed change extends the allowed period of operation with an inoperable containment cooling subsystem from 7 to 14 days.

On July 28, 1985, the containment cooling mode of the "A" Low Pressure Coolant Injection (LPCI) system was being used to transfer water from the torus (suppression pool) to the condenser to control torus level. An increase in condenser conductivity was noted prompting station personnel to take a torus water sample. The torus sample indicated high conductivity, indicative of a tube leak in the LPCI heat exchanger. Subsequent testing confirmed the tube leak and the "3A" LPCI heat exchanger was taken out-of-service, rendering the containment cooling mode of LPCI subsystem "A" inoperable at 1900 hours. As required by Technical Specification 4.5.B.3, surveillances to demonstrate the operability of the "B" LPCI subsystem (containment cooling mode) and the Diesel Generators were initiated and successfully completed.

Efforts were begun immediately to clean the heat exchanger internals to allow identification and plugging of the leaking tube(s). As a result of an excessive accumulation of clams in the tube side of the heat exchanger, local contamination levels requiring rubber protective clothing, and high ambient temperature requiring the use of ice vests, efforts to clean the heat exchanger are proceeding slowly. In addition, a "roto-rooter" tool used to clean the heat exchanger burned out. Inspection of the heat exchanger also indicated that the baffle plate was bent and will require repair prior to returning the heat exchanger to service.

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Pool
w/ check
\$150.00
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Although efforts to clean and repair the heat exchanger are continuing around the clock, the poor ambient working conditions, excessive clam accumulation and the tooling failure are likely to extend the repair period beyond the seven days allowed by the Technical Specification 3.5.B.3. We therefore request a one-time only, emergency amendment extending the allowed repair period to fourteen days to avert a forced reactor shutdown under the current specification. Since this event could not have been anticipated and we are making all possible efforts to repair the heat exchanger as quickly as possible, we request your prompt review and approval of our proposed Technical Specification amendment under the provisions of 10 CFR 50.91.a.(5). Verbal notification of our intent to request this amendment was provided to the Dresden Project Manager on July 29.

The proposed amendment can be found in Attachment 1 and has been both On-Site and Off-Site reviewed. We have reviewed this amendment request and find that no significant hazards consideration exists based on the criteria in 10 CFR 50.92. Our safety evaluation for the proposed amendment and the basis for our determination of no significant hazards consideration is provided in Attachment 2. In addition to the continued performance of the daily operability surveillance on the redundant containment cooling subsystem, Attachment 3 documents other compensatory measures to be implemented during any period of extended repair to assure the availability of containment cooling capability should it be required.

Commonwealth Edison has notified the State of Illinois of our request for this amendment and our appraisal on the question of no significant hazards by telephone call and transmittal of a copy of this letter and its attachments to the designated State Official.

Finally, CECO believes that the amendment involves no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. This determination is based on the information provided in Attachment 2 which concludes that the impact of the proposed amendment on the consequences of normal operation, transients or accidents is minimal. Given our belief that the amendment involves no significant hazards consideration and has no environmental impact, we believe the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9).

This approval is required prior to 1900 hours on August 4, 1985. In accordance with 10 CFR 170, a fee remittance in the amount of \$150.00 is enclosed.

H. R. Denton

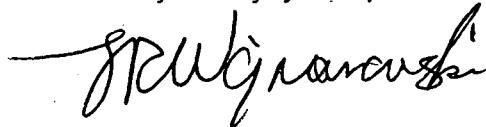
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July 31, 1985

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,



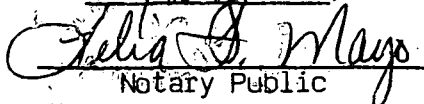
J. R. Wojnarowski
Nuclear Licensing Administrator

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- Attachments (1): Technical Specification Change to DPR-25
(2): Safety Evaluation and Evaluation of Significant Hazards Consideration
(3): Interim Compensatory Measures

cc: Region III Inspector - Dresden
R. Gilbert - NRR
M. C. Parker - IL

SUBSCRIBED AND SWORN to
before me this 31st day
of July, 1985



Notary Public

0419K