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April 4, 1975

Mr. Bernard C. Rusche, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Subject: Dresden Station Unit 2 Proposed Amendment to Facility Operating License No. DPR-19
NRC Docket No. 50-237

Dear Mr. Rusche:

In accordance with 10 CFR 50.59, Commonwealth Edison Company requests an amendment to Facility Operating License No. DPR-19, Appendix A, Technical Specification. The purpose of the proposed amendment is to modify the limiting condition for operation (LCO) to allow all low pressure core and containment cooling systems to be inoperable in the refuel mode provided the reactor has first been brought to cold shutdown and no work is being done which has the potential for draining the reactor vessel. The proposed amendment is indicated on the attached revised Technical Specification page 75.

The safety evaluation for the proposed amendment is attached, and both the proposed amendment and safety evaluation have received Onsite and Offsite review and approval.

The change to the low pressure core cooling system LCO is required to minimize the critical path outage time associated with replacement of the core spray system reactor vessel safe-ends and piping. With this change, control rod coupling and friction testing can be conducted in parallel with the core spray system repairs. Approval of this change is needed by April 14, 1975.

Three (3) signed originals and 37 copies of this proposed amendment are submitted for your review and approval.

Very truly yours,

R. L. Bolger
Assistant Vice-President

SUBSCRIBED and SWORN to before me this 4th day of April, 1975.

Notary Public

4/7/75

To: R. J. SILVER - 3 PAGES
From: J. S. ABEL - Commonwealth Edison

SAFETY EVALUATION

1. The probability of an occurrence or the consequence of an accident, or malfunction of equipment important to safety as previously evaluated in the Final Safety Analysis Report is not increased. Should the Core Spray or LPCI Subsystems ever become inoperable, the initial action remains the same. The reactor will be placed in Cold Shutdown within 24 hours.

2. The possibility for an accident or malfunction of a different type than any previously evaluated in the Final Safety Analysis Report is not created. With the reactor in the "Cold Shutdown" condition, all low pressure core and containment cooling subsystems may be inoperable provided no work is being done which has the potential for draining the reactor vessel (3.5.F.3). From the "Cold Shutdown" condition to place the reactor in refuel does not create the need for low pressure core cooling provided no work is begun which could drain the vessel.

3. The margin of safety, as defined in the basis for the Technical Specification, is not reduced because under the proposed condition, it is not possible to move more than one control rod at a time. Plant design allows for numerous systems to remove reactor decay heat. Therefore, the reactor can not be made critical or reactor temperature increased to create the need for low pressure core cooling.

3.5 LIMITING CONDITION FOR OPERATION	4.5 SURVEILLANCE REQUIREMENTS
4. From and after the date that one of the LPCI pumps is made or found to be inoperable for any reason, reactor operation is permissible only during the succeeding 30 days unless such pump is sooner made operable, provided that during such 30 days the remaining active components of the LPCI and containment cooling subsystem and all active components of both core spray subsystems and the diesel generators required for operation of such components if no external source of power were available shall be operable.	4. When it is determined that one of the LPCI pumps is inoperable, the remaining active components of the LPCI and containment cooling subsystem, both core spray subsystems and the diesel generators required for operation of such components if no external source of power were available shall be demonstrated to be operable immediately and the operable LPCI pumps daily thereafter.
5. From and after the date that the LPCI subsystem is made or found to be inoperable for any reason, reactor operation is permissible only during the succeeding 7 days unless it is sooner made operable, provided that during such 7 days all active components of both core spray subsystems, the containment cooling subsystem (including 2 LPCI pumps) and the diesel generators required for operation of such components if no external source of power were available shall be operable.	5. When it is determined that the LPCI subsystem is inoperable, both core spray subsystems, the containment cooling subsystem, and the diesel generators required for operation of such components if no external source of power were available shall be demonstrated to be operable immediately and daily thereafter.
6. Containment cooling spray loops are required to be operable when the reactor water temperature is greater than 212°F except that a maximum of one drywell spray loop may be inoperable for 30 days when the reactor water temperature is greater than 212°F.	6. During each five-year period, an air test shall be performed on the drywell spray headers and nozzles.
7. If the requirements of 3.5.A can not be met, an orderly shutdown of the reactor shall be initiated and the reactor shall be in Cold Shutdown within 24 hours. Subsequently, the reactor may be placed in Refuel, provided no work is being performed which has the potential to drain the reactor vessel.	