ATTACHMENT 1

DRESDEN UNIT 2 - DPR-19

PROPOSED TECHNICAL SPECIFICATION CHANGE

AFFECTED PAGE: 3/4.9-4
(page 3/4.9-3 attached for completeness)

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3.9 LIMITING CONDITION FOR OPERATION (Cont'd.)

4.9 SURVEILLANCE REQUIREMENT (Cont'd.)

permissible only during the succeeding seven days unless an additional line is sooner placed in service providing both the Unit 2 and Unit 2/3 emergency diesel generators are operable. From and after the date that incoming power is not available from any line, reactor operation is permissible providing both the Unit 2 and Unit 2/3 emergency diesel generators are operating and all core and containment cooling systems are operable and the NRC is notified within 24 hours of the situation, the precautions to be taken during this situation, and the plans for prompt restoration of incoming power.

2. From and after the date that one of the diesel generators and/or its associated bus is made or found to be inoperable for any reason, reactor operation is permissible according to Specification 3.5/4.5F and 3.9D only during the succeeding seven days unless such diesel generator and/or bus is sooner made

3.9 LIMITING CONDITION FOR OPERATION (Cont'd.)

4.9 SURVEILLANCE REQUIREMENT (Cont'd.)

operable, provided that during such seven days the operable diesel generator shall be demonstrated to be operable at least once each day and two off-site lines as specified in 3.9.A. are available.

The specified 7 day outage period will apply except for spring of 1986, at which time an additional 7 days (14 total) will be allowed, on a one time only basis, to complete 10CFR 50 Appendix R modifications to the 2/3 Diesel Generator.

3. From and after the date that one of the two 125 or 250V battery systems is made or found to be inoperable, except as specified in 3.9.B.4a or b, Unit shutdown shall be initiated within 2 hours and the unit shall be in cold shutdown in 24 hours unless the failed battery can be sooner made operable.

4. a. Each 125 or 250 volt battery may be inoperable for a maximum of 7 days per operating cycle for maintenance and testing.

b. If it is determined that a battery need be replaced as a result of maintenance or testing, a specific battery may be inoperable for an additional 7 days per operating cycle.

ATTACHMENT 2

NO SIGNIFICANT HAZARDS CONSIDERATION

Description of Amendment Request

An amendment to Dresden Unit 2 Technical Specification Section 3.9.B.2 is requested to extend the allowable repair period for the 2/3 emergency diesel generator from seven to fourteen days on a one time only basis. The extension is needed to complete those modifications to the diesel generator and its associated buses, required by 10 CFR 50, Appendix R, to be implemented prior to completion of the current Dresden Unit 3 refuel outage (presently projected for July, 1986). The required work cannot be completed within the existing seven-day provision nor can the modification be broken into smaller increments.

Basis for No Significant Hazards Consideration

Commonwealth Edison has reviewed the proposed amendment against the criteria in 10 CFR 50.92(c) and determined that no significant hazards consideration exists. This determination is based on the following evaluation of alternate sources of AC power which will be available during the extended outage period. Compensatory measures to be taken during the extended outage are described and are also summarized in Attachment 3.

The 2/3 diesel generator is used primarily to provide AC power, concurrently with the respective unit's dedicated diesel generator, to those unit auxiliaries required for safe unit shutdown in the event of loss of off-site power and a loss of coolant accident. Presently, Dresden Technical Specifications require the 2/3 diesel generator to be operable during the operation of either unit with the above mentioned seven day repair period being the only exception. Lack of the 2/3 diesel generator's availability for the extended period will have no effect on Dresden's Unit 3 as it is currently defueled and therefore, by Unit 3 Technical Specification Section 3.9.D, required to have only one diesel generator at its disposal. The Unit 3 dedicated diesel generator will serve that purpose during the requested repair period extension.

Normally, the Unit 2 auxiliary loads are fed by both the unit auxiliary transformer and the reserve auxiliary transformer. The unit transformer is fed by the main unit generator and the reserve transformer is fed by the 138kV switchyard. In the past, the 138kV switchyard has been a highly reliable power source. If either the unit or reserve auxiliary transformer is lost, loads are automatically transferred to the remaining transformer. If power feed from both transformers is lost, the necessary loads may be carried by any one of three alternatives. The first source that would be normally utilized with this occurrence would be the Unit 2

dedicated diesel generator. Although meant to run in conjunction with the 2/3 diesel generator, it is amply sized to alone carry all necessary Unit 2 loads required to mitigate an accident (i.e., one of the two divisions of ECCS equipment). Historically, Dresden's diesel generators have proven quite reliable, maintaining a failure rate of less than 4%. Based on this fact alone, there is minimal increased risk due to operating Unit 2 during the requested outage period. Additionally, per Unit 2 Technical Specifications, the operability of the diesel generator will be verified daily throughout the outage.

The likelihood of the Unit 2 diesel generator failing after having lost Unit 2 off-site power is very small. Should this occur, Unit 2's required loads can be fed by the Unit 3 reserve auxiliary transformer which is fed by the 345kV switchyard. This is accomplished via a 4kV bus-tie linking the bus of the Unit 2 diesel generator (24-1) with the Unit 3 Reserve Auxiliary Transformer. Actuation of this tie may be completed in a matter of minutes by closing breakers from the main control room. The Unit 3 reserve auxiliary transformer is sufficiently sized to carry these additional loads. To provide assurance that the bus-tie capability is available throughout the proposed extended outage, those breakers which allow the linking will be demonstrated operable by cycling the breakers at the onset of the outage.

The third available supply of AC power is the dedicated Unit 3 diesel generator. The same 4kV bus tie which enables the Unit 2 emergency bus to be fed from the 345kV system may be used to supply that bus from the Unit 3 dedicated diesel generator. Utilization of the Unit 3 diesel generator in this way is allowable, by Unit 3 Technical Specifications, since no fuel will be in the Unit 3 reactor vessel. In an effort to ensure operability of the Unit 3 diesel generator, an operability check will be made at the onset of the second seven day period of the outage.

Prior to the start of the outage, the unit operators will be alerted as to the available alternative sources of AC power and their proper implementation.

As a result of the variety of alternate sources of AC power which will be available during the extended outage period, Commonwealth Edison has determined that the proposed amendment does not represent a significant hazards consideration. Specifically, the proposed amendment will not:

1. Involve a significant increase in the probability or consequences of an accident previously evaluated because the inoperability of the diesel generator is a passive state which cannot of itself initiate an accident nor the probability of an accident. The consequences of an accident will not be increased because alternate sources of AC power will be available to assure power feed to at least one of two redundant ECCS

divisions. In addition to backup sources of AC power normally available and reflected in the Technical Specifications, an additional source via the Unit 3 dedicated diesel generator will be available as a backup to the Unit 2 diesel during the extended outage. Therefore, the probability of loss of all AC power is not significantly affected by the proposed amendment.

2. Create the possibility of a new or different kind of accident from any previously evaluated because the proposed amendment only affects the reliability of backup AC power. Unavailability of the 2/3 diesel generator for an additional seven days is a passive state which cannot initiate an accident of any type. The availability of other sources of AC power will assure that the progression of an accident and functioning of required mitigating systems will not be appreciably different than previously evaluated.

3. Involve a reduction in the margin of safety because compensatory measures are being taken to assure the availability of backup AC power in the unlikely event it is required during the additional seven day period. Specifically, the operability of the 4kV bus-tie and the Unit 3 diesel will be verified to assure redundancy in available AC power feeds to required accident mitigating systems. This increase is reliability of power feed to at least one ECCS division (thru bus 24-1) off-sets the incremental risk associated with the extended period the 2/3 diesel will be unavailable.

Based on the above evaluation, we conclude that the proposed amendment does not represent a significant hazards consideration.

ATTACHMENT 3

COMPENSATORY MEASURES

The following actions will be taken to provide additional assurance of backup AC power availability:

1. At the onset of the repair period, the 4kV bus cross-tie breakers will be separately checked for operability.

2. The Unit 2 dedicated diesel generator will be operationally checked daily (currently required by Technical Specifications - will be continued during extended outage period).

3. Unit 3 fuel load will be delayed until the completion of the requested outage.

4. At the onset of the second seven day period of the outage operability of the Unit 3 diesel generator will be verified.

5. Prior to the outage, the unit operators will be alerted as to the available alternate sources of AC power and their proper implementation.