ATTACHMENT 1

PROPOSED CHANGES TO DRESDEN UNIT 2

TECHNICAL SPECIFICATIONS

Affected Pages: Table 3.2.2
Table 3.7.1

1906K

TABLE 3.2.2
INSTRUMENTATION THAT INITIATES OR CONTROLS THE CORE AND CONTAINMENT COOLING SYSTEMS

Min. No. of Operable Inst. Channels per Trip System (1)	Trip Function	Trip Level Setting	Remarks
2	Reactor Low Low Water Level	84" (plus 4, minus 0 inches) above top of active fuel (5)	1. In conjunction with low reactor pressure initiates core spray and LPCI. 2. In conjunction with high dry-well pressure, 120 sec. time delay, and low pressure core cooling interlock initiates auto blowdown. 3. Initiates HPCI and SBGTS. 4. Initiates starting of diesel generators.
2	High Drywell Pressure (2), (3)	Less than or equal to 2 PSIG	1. Initiates core spray LPCI, HPCI, and SBGTS. 2. In conjunction with low low water level 120 sec. time delay and low pressure core cooling interlock initiates auto blowdown. 3. Initiates starting of diesel generators.
1	Reactor Low Pressure	Greater than or equal to 300 PSIG & less than or equal to 350 PSIG	1. Permissive for opening core spray and LPCI admission valves. 2. In conjunction with low low reactor water level initiates core spray and LPCI.
1 (4)	Containment Spray Inter-lock 2/3 Core Height	Greater than or equal to 2/3 core height	Prevents inadvertent operation of containment spray during accident conditions.
2 (4)	Containment High Pressure	Greater than or equal to 0.5 PSIG & less than or equal to 1.5 PSIG	Prevents inadvertent operation of containment spray during accident conditions.
1	Timer Auto Blowdown	Less than or equal to 120 seconds	In conjunction with low low reactor water level, high dry-well pressure and low pressure core cooling interlock initiates auto blowdown.
2	Low Pressure Core Cooling Pump Discharge Pressure	Greater than or equal to 50 PSIG & less than or equal to 100 PSIG	* Defers APR actuation pending confirmation of low pressure core cooling system operation.
2/Bus	Under Voltage on 4 KV Emergency Buses	Greater than or equal to 3092 volts (Equals 3255 less) 5% tolerance)	1. Initiates starting of diesel generators. ~~2.~~ Permissive for starting ECCS pumps. 3. Removes nonessential loads from buses.
2	Sustained High Reactor Pressure	Less than or equal to 1070 PSIG for 15 seconds	Initiates isolation condenser.
2/Bus	Degraded Voltage on 4 KV Emergency Buses	Greater than or equal to 3708 volts (equals 3748 volts less 2% tolerance) after less than or equal to 5 minutes (plus 5% tolerance) with a 7 second (plus or minus 20%) inherent time delay	Initiates alarm and picks up time delay relay. Diesel generator picks up load if degraded voltage not corrected after time delay.

Notes: (See next page)

3960a
3843a

TABLE 3.7.1
PRIMARY CONTAINMENT ISOLATION

Isolation Group	Valve Identification	Listing of Power Operated Valves by Valve Number Outboard	Inboard	Maximum Operating Time (sec)	Normal Position	Action on Initiating Signal
1	Main Steam Line Isolation	(4)203-2A,B,C,D	(4)203-1A,B,C,D	3*T*5	O	GC
1	Main Steam Line Drain	220-2	220-1	* 35	C	SC
1	Recirculation Loop Sample (See Note 1)	220-45	220-44	* 5	C	SC
1	Isolation Condenser Vent	1301-20	1301-17	* 5	O	GC
2	Reactor Head Cooling		205-2-4	* 15	C	SC
2	Drywell Floor Drain	2001-106	2001-105	* 20	C	SC
2	Drywell Equipment Drain	2001-6	2001-5	* 20	C	SC
2	Drywell Vents	1601-23	1601-24	* 10	C	SC
2	Drywell Vent Relief		1601-62	* 15	C	SC
2	Drywell Inert & Purge		1601-21	* 10	C	SC
2	Drywell N_2 Makeup		1601-59	* 15	O	GC
2	Drywell/Torus N_2 Makeup	1601-57		* 15	O	GC
2	Drywell/Torus Inert	1601-55		* 15	O	GC
2	Torus N_2 Makeup		1601-58	* 15	C	SC
2	Torus Inert & Purge		1601-56	* 10	O	GC
2	Drywell & Torus Vent from Reactor Building	1601-22		* 10	C	SC
2	Drywell Vent to Standby Gas Treatment	1601-63		* 10	C	SC
2	Torus Vent		1601-60	* 10	C	SC
2	Torus Vent Relief		1601-61	* 15	C	SC
2	Drywell Air Sampling System (See Note 1)	(7)9205A, 9206A, 9207B, 9208B, 8501-1B, 8501-3B, 8501-5B	(7)9205B, 9206B, 9207A, 9208A, 8501-1A, 8501-3A, 8501-5A	* 5	O	GC
2	Torus to Condenser Drain	1599-62	1599-61	* 10	C	SC
2	Drywell Pneumatic Supply	4721	4720	* 10	O	GC
3	Cleanup Demineralizer system	1201-2	1201-1	* 30	O	GC
3	Cleanup Demineralizer System	1201-3	1201-1A	* 30	C	SC
3	Shutdown Cooling	(3)1001-2A,B,C	(4)1001-1A, 1B 1001-5A,B	* 40	C	SC
4	HPCI Turbine Steam Supply	2301-4	2301-5	* 25	O	GC
4	HPCI Torus Suction	2301-35	2301-36	* 80	C	SC
5	Isolation Condenser Steam Supply	1301-2	1301-1	* 30	O	GC
5	Isolation Condenser Condensate Return		1301-4	* 30	O	GC
5	Isolation Condenser Condensate Return	1301-3		* 30	C	SC
N/A	Feedwater Check Valves	220-62A,62B	220-58A,58B	N/A	O	Process
N/A	Control Rod Hydraulic Return Check Valves	301-95	301-98	N/A	C	Process
N/A	Reactor Head Cooling Check Valves		205-2-7	N/A	C	Process
N/A	Standby Liquid Control Check Valves	1101-16	1101-15	N/A	C	Process
N/A	Core Spray Injection	(2)1401-24A,24B		N/A	O	N/A
			(2)1402-25A,25B	N/A	C	N/A
N/A	Core Spray Test Return		(2)1402-4A,4B	N/A	C	N/A
N/A	Core Spray Suction		(2)1402-3A,3B	N/A	O	N/A
N/A	LPCI Torus Spray	(2)1501-18A,18B	(2)1501-19A,19B	N/A	C	N/A
N/A	LPCI Test Return	(2)1501-20A,20B	(2)1501-38A,38B	N/A	C	N/A
N/A	LPCI Injection	(2)1501-22A,22B	(2)1501-25A,25B	N/A	C	N/A
N/A	LPCI Drywell Spray	(2)1501-27A,27B	(2)1501-28A,28B	N/A	C	N/A
N/A	LPCI Suction		(4)1501-5A,5B,5C,5D	N/A	O	N/A

Notes: (See Next Page)

ATTACHMENT 2

PROPOSED CHANGES TO DRESDEN UNIT 3

TECHNICAL SPECIFICATIONS

Affected Pages: Table 3.2.2
Table 3.7.1

1906K

TABLE 3.2.2
INSTRUMENTATION THAT INITIATES OR CONTROLS THE CORE AND CONTAINMENT COOLING SYSTEMS

Min. No. of Operable Inst. Channels per Trip System (1)	Trip Function	Trip Level Setting	Remarks
2	Reactor Low Low Water Level	84" (plus 4, minus 0 inches) above top of active fuel (5)	1. In conjunction with low reactor pressure initiates core spray and LPCI. 2. In conjunction with high dry-well pressure, 120 sec. time delay, and low pressure core cooling interlock initiates auto blowdown. 3. Initiates HPCI and SBGTS. 4. Initiates starting of diesel generators.
2	High Drywell Pressure (2), (3)	Less than or equal to 2 PSIG	1. Initiates core spray, LPCI, HPCI, and SBGTS. 2. In conjunction with low low water level 120 sec. time delay, and low pressure core cooling interlock initiates auto blowdown. 3. Initiates starting of diesel generators.
1	Reactor Low Pressure	Greater than or equal to 300 PSIG & less than or equal to 350 PSIG	1. Permissive for opening core spray and LPCI admission valves. 2. In conjunction with low low reactor water level initiates core spray and LPCI.
1 (4)	Containment Spray Interlock 2/3 Core Height	Greater than or equal to 2/3 core height	Prevents inadvertent operation of containment spray during accident conditions.
2 (4)	Containment High Pressure	Greater than or equal to 0.5 PSIG & less than or equal to 1.5 PSIG	Prevents inadvertent operation of containment spray during accident conditions.
1	Timer Auto Blowdown	Less than or equal to 120 seconds	In conjunction with low low reactor water level, high dry-well pressure, and low pressure core cooling interlock initiates auto blowdown.
2	Low Pressure Core Cooling Pump Discharge Pressure	Greater than or equal to 50 PSIG & less than or equal to 100 PSIG.	* Defers APR actuation pending confirmation of low pressure core cooling system operation.
2/Bus	Under Voltage on 4 KV Emergency Buses	Greater than or equal to 3092 volts (Equals 3255 less 5% tolerance)	1. Initiates starting of diesel generators. 2. Permissive for starting ECCS pumps. 3. Removes nonessential loads from buses.
2	Sustained High Reactor Pressure	Less than or equal to 1070 PSIG for 15 seconds	Initiates isolation condenser.
2/Bus	Degraded Voltage on 4 KV Emergency Buses	Greater than or equal to 3708 volts (equals 3748 volts less 2% tolerance) after less than or equal to 5 minutes (plus 5% tolerance) with a 7 second (plus or minus 20%) inherent time delay	Initiates alarm and picks up time delay relay. Diesel generator picks up load if degraded voltage not corrected after time delay.

Notes: (See next page)

TABLE 3.7.1
PRIMARY CONTAINMENT ISOLATION

Isolation Group	Valve Identification	Listing of Power Operated Valves by Valve Number: Outboard	Inboard	Maximum Operating Time (sec)	Normal Position	Action on Initiating Signal
1	Main Steam Line Isolation	(4)203-2A,B,C,D	(4)203-1A,B,C,D	3*T*5	0	GC
1	Main Steam Line Drain	220-2	220-1	* 35	C	SC
1	Recirculation Loop Sample (See Note 1)	220-45	220-44	* 5	C	SC
1	Isolation Condenser Vent	1301-20	1301-17	* 5	0	GC
2	Reactor Head Cooling		205-2-4	* 15	C	SC
2	Drywell Floor Drain	2001-106	2001-105	* 20	C	SC
2	Drywell Equipment Drain	2001-6	2001-5	* 20	C	SC
2	Drywell Vents	1601-23	1601-24	* 10	C	SC
2	Drywell Vent Relief		1601-62	* 15	C	SC
2	Drywell Inert & Purge		1601-21	* 10	C	SC
2	Drywell N_2 Makeup		1601-59	* 15	0	GC
2	Drywell/Torus N_2 Makeup	1601-57		* 15	0	GC
2	Drywell/Torus Inert	1601-55		* 15	0	GC
2	Torus N_2 Makeup		1601-58	* 15	C	SC
2	Torus Inert & Purge		1601-56	* 10	0	GC
2	Drywell & Torus Vent from Reactor Building	1601-22		* 10	C	SC
2	Drywell Vent to Standby Gas Treatment	1601-63		* 10	C	SC
2	Torus Vent		1601-60	* 10	C	SC
2	Torus Vent Relief		1601-61	* 15	C	SC
2	Drywell Air Sampling System (See Note 1)	(7)9205A, 9206A, 9207B, 9208B, 8501-1B, 8501-3B, 8501-5B	(7)9205B, 9206B, 9207A, 9208A, 8501-1A, 8501-3A, 8501-5A	* 5	0	GC
2	Torus to Condenser Drain	1599-62	1599-61	* 10	C	SC
2	Drywell Pneumatic Supply	4721	4720	* 10	0	GC
3	Cleanup Demineralizer system	1201-2	1201-1	* 30	0	GC
3	Cleanup Demineralizer System	1201-3	1201-1A	* 30	C	SC
3	Shutdown Cooling	(3)1001-2A,B,C	(4)1001-1A, 1B 1001-5A,B	* 40	C	SC
4	HPCI Turbine Steam Supply	2301-4	2301-5	* 25	0	GC
4	HPCI Torus Suction	2301-35	2301-36	* 80	C	SC
5	Isolation Condenser Steam Supply	1301-2	1301-1	* 30	0	GC
5	Isolation Condenser Condensate Return		1301-4	* 30	0	GC
5	Isolation Condenser Condensate Return	1301-3		* 30	C	SC
N/A	Feedwater Check Valves	220-62A,62B	220-58A,58B	N/A	0	Process
N/A	Reactor Head Cooling Check Valves		205-2-7	N/A	C	Process
N/A	Standby Liquid Control Check Valves	1101-16	1101-15	N/A	C	Process
N/A	Core Spray Injection	(2)1401-24A,24B		N/A	0	N/A
			(2)1402-25A,25B	N/A	C	N/A
N/A	Core Spray Test Return		(2)1402-4A,4B	N/A	C	N/A
N/A	Core Spray Suction		(2)1402-3A,3B	N/A	0	N/A
N/A	LPCI Torus Spray	(2)1501-18A,18B	(2)1501-19A,19B	N/A	C	N/A
N/A	LPCI Test Return	(2)1501-20A,20B	(2)1501-38A,38B	N/A	C	N/A
N/A	LPCI Injection	(2)1501-22A,22B	(2)1501-25A,25B	N/A	C	N/A
N/A	LPCI Drywell Spray	(2)1501-27A,27B	(2)1501-28A,28B	N/A	C	N/A
N/A	LPCI Suction		(4)1501-5A,5B,5C,5D	N/A	0	N/A

Notes: (See Next Page)

ATTACHMENT 3

DESCRIPTION OF PROPOSED CHANGES

The Dresden Station Units 2 and 3 Technical Specifications are being revised to reflect the following:

(1) Correction of typographical errors in Tables 3.2.2 and 3.7.1 (Units 2 and 3).

(2) Deletion of Unit 2 Control Rod Drive return line check valves from Table 3.7.1. Change the "Normal Position" of the Control Rod Drive return valves from "open" to "closed" for Unit 2.

Basis For Proposed Changes

Concerning Technical Specification Table 3.2.2, it was discovered that Technical Specification Amendment Nos. 83 and 77 on Dresden Units 2 and 3, respectively, inadvertently changed the trip level setting for the Degraded Voltage trip on 4kv Emergency Buses from the original less than or equal to 5 minutes to a setpoint of less than or equal to 4 minutes, and changed the inherent time delay tolerance from plus or minus 20% to plus 20%. Technical Specification Amendment Nos. 83 and 77 were made to include changes in snubber tables and radiological effluent technical specfications and do not include references concerning changes to the trip level settings in Technical Specification Table 3.2.2. However, in the process of incorporating Amendment Nos. 83 and 77 into the Technical Specifications, Table 3.2.2 was retyped and the incorrect trip setpoint time of less than or equal to 4 minutes and the incorrect inherent time delay tolerance of plus 20% for the Degraded Voltage on 4kv Emergency Buses were made. It is therefore requested that Unit 2 and 3 Technical Specifications Table 3.2.2 be revised to include the original 4kv Degraded Voltage trip setpoint of less than or equal to 5 minutes and the original inherent trip delay tolerance of plus or minus 20%.

It was also discovered that a typographical error was made to Technical Specifications Table 3.7.1 concerning the HPCI torus suction valves 2301-35 and 36. The standard closing time for these valves is 80 seconds as listed in the updated FSAR Table 5.2.2.5 (12"/minute; 16" valve). When these valves were added to Table 3.7.1, their closing time was inadvertently listed as 30 seconds. It is requested that Technical Specifications Table 3.7.1 be revised for Dresden Units 2 and 3 to include the correct closing time of 80 seconds for valves 2301-35 and 36 and to remove the incorrect 30 second closing time.

CRD valves 3-0301-95 and 3-0301-98 are being removed from Unit 3 Technical Specifications Table 3.7.1, "Primary Containment Isolation". During the Unit 3 1985-86 recirculation pipe replacement outage, the CRD return line (including inboard check valve 3-0301-98) to the reactor vessel was permanently removed from inside primary containment. The reactor vessel nozzle was capped at the safe-end and the containment penetration was capped on the inboard side. Outside primary containment, the pipe was cut and caps installed on the segment protruding from the containment penetration and on the line downstream of the outboard check valve 3-0301-95. This deleted CRD valve 3-0301-98, and isolated CRD valve 3-0301-95 from primary containment. The CRD return line has remained valved out during normal power operation and is being removed permanently to comply with NUREG-0619. As these valves no longer serve as primary containment isolation valves, Units 3 Technical Specifications Table 3.7.1 is being revised to delete them.

The normal position for the Unit 2 CRD return check valves 2-0301-95 and 2-0301-98 as presently listed in the Unit 2 Technical Specifications Table 3.7.1 is open (o). This is being changed to closed (c). Due to thermal stress cracking on the CRD return line and nozzle, the return line is no longer used during normal operation. The line has been valved out via the two CRD manual return valves, therefore normal position for the primary containment isolation check valves 2-0301-95 and 2-0301-98 is closed.

ATTACHMENT 4

EVALUATION OF SIGNIFICANT HAZARDS CONSIDERATION

Description of Amendment Request

The proposed amendments to the Dresden Units 2 and 3 Technical Specifications include:

(a) Various editorial, grammatical, typographical and reference changes.

(b) A change to allow post-maintenance testing of control rod drives with the reactor in the REFUEL mode with Low Pressure Cooling Systems inoperable.

(c) Deletion of the Unit 3 Control Rod Drive (CRD) return line check valves from the Containment Isolation Valve Table and changing the "Normal Position" of the CRD Return Valves for Unit 2 from "open" to "close".

Basis for Proposed No Significant Hazards Consideration Determination

Commonwealth Edison has evaluated the proposed Technical Specification amendment and determined that it does not represent a significant hazards consideration. Based on the criteria for defining a significant hazards consideration established in 10 CFR 50.92(c), operation of Dresden Units 2 and 3 in accordance with the proposed amendments will not:

(1) involve a significant increase in the probability or consequences of an accident previously evaluated because:

(a) The miscellaneous editorial, grammatical, typographical and reference changes are administrative in nature and do not allow any new operating practices or changes in equipment which could impact the probability or consequences of an accident.

(b) The provision to allow control rod drive testing with Low Pressure Cooling Systems inoperable includes restrictions that the reactor be in the REFUEL mode (following achievement of cold shutdown) and specifically prohibit any simultaneous work which has the potential to drain the reactor vessel. The latter provision ensures that the probability of a loss of coolant accident is not increased by this amendment. In addition, REFUEL mode interlocks prevent the withdrawal of more than one control rod thereby protecting against the possibility of making the reactor critical.

(c) The changes regarding the CRD return line valves reflect actions taken by Commonwealth Edison in response to NRC recommendations in NUREG-0619. As a result thermal stress cracking in these lines, these lines had previously been isolated and on Unit 3, the line was recently removed. The proposed changes modify the Technical Specifications to reflect the current plant configuration. The CRD return lines have either been permanently isolated (Unit 3) or have the isolation valves closed (Unit 2) to ensure primary containment integrity.

(2) Create the possibility of a new or different kind of accident from any accident previously evaluated because

(a) The administrative changes do not allow any new equipment or operating procedures which could initiate or impact the scenario of an accident or operational event.

(b) Post maintenance testing of control rod drives is not a new activity and therefore does not introduce any new concerns regarding the initiation or progression of a transient event. This provision does not involve any new equipment, changes to equipment, or significant changes to operating procedures and therefore cannot initiate any new events beyond those previously evaluated.

(c) The changes regarding the CRD line valves are conservative in that they reflect the removal or isolation of this line in response to NRC requirements.

(3) Involve a significant reduction in the margin of safety because the changes are either administrative and have no direct affect on operating limits or equipment availability or contain specific provisions to assure the margin of safety is not compromised as in the case of the control rod drive testing provision and the CRD return line valves (where removal/isolation of these lines provides additional protection against the thermal stress cracking concern).

In consideration of the above, Commonwealth Edison has determined that the proposed amendments do not represent a significant hazards consideration and requests their approval under the provisions of 10 CFR 50.91(a)(4).