



Commonwealth Edison
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 Chicago, Illinois 60690 - 0767

August 26, 1986

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

**Subject: Dresden Nuclear Power Station Units 2 and 3
 Proposed Technical Specification
 Amendment - Deletion of Diesel Generator
 Testing When ECCS Systems are Inoperable
 NRC Docket Nos. 50-237 and 50-249**

Dear Mr. Denton:

Pursuant to 10 CFR 50.90, Commonwealth Edison proposes to amend Appendix A, the Technical Specifications, to Provisional Operating License DPR-19 and Facility Operating License DPR-25 to modify diesel generator testing requirements. The proposed amendment deletes certain diesel generation testing requirements, as recommended by the NRC in Generic Letter 84-15, to eliminate unnecessary and excessive testing. In addition, we've incorporated a provision to allow a 1 1/2 hour period of preventative maintenance on a diesel generator without requiring low pressure core cooling system surveillances. These proposed changes are further described in Attachment 1.

The proposed amendments can be found in Attachments 2 and 3 and have been both On-Site and Off-Site reviewed. We have reviewed these amendment requests and find that no significant hazards consideration exists. Our review is documented in Attachment 4. Commonwealth Edison will notify the State of Illinois of our request for this amendment and our appraisal on the question of no significant hazards consideration by transmittal of a copy of this letter and its attachments to the designated State Official.

In accordance with 10 CFR 170, a fee remittance in the amount of \$150.00 is enclosed.

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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): Description of Proposed Changes
- (2): Technical Specification Change to DPR-19
- (3): Technical Specification Change to DPR-25
- (4): Evaluation of Significant Hazards Consideration

cc: Region III Inspector - Dresden
 R. Gilbert - NRR
 M. C. Parker - State of Ill.

SUBSCRIBED AND SWORN to
 before me this 26th day
 of August, 1986

Notary Public

ATTACHMENT 1

DESCRIPTION OF PROPOSED CHANGES

Change #1

In Generic Letter 84-15, the NRC recommended that the requirements for testing diesel generators while emergency core cooling equipment is inoperable, be deleted from the Technical Specifications of the earlier licensed operating plants. This recommendation was a result of the concern expressed by industry related groups that frequent testing results in incremental degradation of diesel engines.

Dresden Units 2 and 3, both being earlier licensed plants, perform diesel generator surveillances when low pressure emergency core cooling equipment is inoperable. Dresden Station also maintains the position that these surveillances are excessive and probably cause incremental engine degradation. The preventive maintenance program at Dresden has allowed its diesel engines to achieve a high degree of reliability. The Unit 2, 2/3 and 3 diesel generators achieved a reliability of 97, 98 and 92 percent, respectively as reported in Generic Letter 84-15 for the 100 starts previous to September 5, 1984. The Unit 2, 2/3 and 3 diesel generator achieved a reliability of 100, 100 and 88.2 percent, respectively in 1983 and 1984 as reported by Dresden in response to the NSAC emergency diesel generator reliability survey. Eliminating diesel generator surveillances when low pressure emergency core cooling equipment is inoperable will create an approximate 15 to 30 percent reduction in the number of diesel engine surveillances using 1983 and 1985 data. Data for the years 1982 through 1984 indicate that an average of 78 diesel engine surveillances are run per year. The mentioned reduction will reduce the number of surveillances to an approximate 54 to 66 per year.

Commonwealth Edison therefore proposes to eliminate the diesel generator surveillances which were required whenever the following limiting conditions for operation occurred.

<u>LCO</u>	<u>Technical Specification Surveillance Requirement</u>
One Core Spray Subsystem Inoperable	4.5.A.2
LPCI Pump Inoperable	4.5.A.4
LPCI Subsystem Inoperable	4.5.A.5
Containment Cooling Subsystem Inoperable	4.5.B.3

The mention of these surveillances must also be removed from page B 3/4.5-30 of the Technical Specification Limiting Condition for Operation Bases for consistency.

Change #2

Dresden Station desires to implement a Technical Specification addition which would allow a diesel engine to be taken out-of-service for a 1 1/2 hour period of preventive maintenance. This period shall not be allowed unless two off-site lines are available and the alternate diesel generator has been proven operable. The Quad Cities Technical Specifications have this feature.

The addition of this specification will reduce the number of core spray, low pressure coolant injection and containment cooling service water surveillances which must be performed when a diesel engine is taken out-of-service for minor maintenance.

Commonwealth Edison, therefore, recommends that step 3.9.B.2.b be incorporated into the Technical Specifications to reduce the number of low pressure core cooling surveillances presently required by Specification 3.5/4.5F. This 1 1/2 hour preventive maintenance period in the startup/hot standby and run modes will only be allowed after the alternate diesel generator is proven operable and when two off-site lines are available. We feel this change will increase the reliability of low pressure core cooling equipment by minimizing the number of times this equipment is operated. This 1 1/2 hour period of preventive maintenance is of relatively short duration and would create no significant hazard.