ATTACHMENT 1

PROPOSED CHANGES TO APPENDIX A

OF THE

DRESDEN UNITS 2 AND 3 OPERATING LICENSES

DPR-19, Page #	DPR-25, Page #
3/4.2-17 (Table 3.2.6)	3/4.2-17 (Table 3.2.6)
3/4.2-19 (Table 4.2.1)	3/4.2-19 (Table 4.2.1)
3/4.2-26 (Table 4.2.4)	3/4.2-26 (Table 4.2.4)
B 3/4.2-36	
B 3/4.2-37	
3/4.7-1	3/4.7-1
3/4.7-2	3/4.7-2
3/4.7-3	3/4.7-3

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Table 3.2.6
Post Accident Monitoring Instrumentation Requirements

Minimum Number of Operable Channels (1)	Parameter	Instrument Readout Location Unit 2	Number Provided	Instrument Range
1	Reactor Pressure	902-5	1	0-1500 psig
			2	0-1200 psig
		902-3	1	0-1500 psig
1	Reactor Water Level	902-3, 5	2	-340 to +60 inches
1	Torus Bulk Water Temperature	902-4, 37	2	0-300°F
2 (3)	Torus Water Level Indicator	902-3	1	-20 to +20 inches (narrow range)
		902-2	2	0-30 ft (wide range)
	Torus Water Local Sight Glass		1	40 inch range (narrow range)
1 (4)	Torus Pressure	902-5	1	-2.45 to +5 psig
2	Drywell Pressure	902-5	1	0-5 psig
		902-3	1	-5 to +70 psig
		902-3	2	-5 to +250 psig
2	Drywell Temperature	902-3	6	0-600°F
2	Neutron Monitoring	902-5	4	$0.1-10^6$ CPS
1 (4)	Torus to Drywell Differential Pressure	902-3	2	0-3 psid
1	Drywell Radiation Monitor	902-55,56	2	1 to 10^8 R/hr
2/valve (2)	Main Steam RV Position, Acoustic Monitor	902-21	1 per valve	N/A
	Main Steam RV Position, Temperature Monitor	902-21	1 per valve	0-600°F
2/valve (2)	Main Steam SV Position, Acoustic Monitor	902-21	1 per valve	N/A
	Main Steam SV Position, Temperature Monitor	902-21	1 per valve	0-600°F
1 (5)	Drywell Hydrogen Concentration	902-55 902-56	2	0-10%

Notes: (See Next Page)

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Instrument Channel	Instrument Functional Test	Calibration	Instrument Check
ECCS Instrumentation			
1. Reactor Low-Low Water Level	(1)	Once/3 Months	Once/Day
2. Drywell High Pressure	(1)	Once/3 Months	None
3. Reactor Low Pressure	(1)	Once/3 Months	None
4. Containment Spray Interlock			
a. 2/3 Core Height	(1) (13)	(13)	None
b. Containment High Pressure	(1)	Once/3 Months	None
5. Low Pressure Core Cooling Pump Discharge	(1)	Once/3 Months	None
6. Undervoltage Emergency Bus	Refueling Outage	Refuel Outage	Once/3 months
7. Sustained High Reactor Pressure	(1)	Once/3 Months	None
8. Degraded Voltage Emergency Bus	Refueling Outage (10)	Refuel Outage	Monthly
Rod Blocks			
1. APRM Downscale	(1) (3)	Once/3 Months	None
2. APRM Flow Variable	(1) (3)	Refuel Outage	None
3. APRM Upscale (Startup/Hot Standby)	(2) (3)	(2) (3)	(2)
4. IRM Upscale	(2) (3)	(2) (3)	(2)
5. IRM Downscale	(2) (3)	(2) (3)	(2)
6. IRM Detector Not Fully Inserted in the Core	(2)	N/A	None
7. RBM Upscale	(1) (3)	Refuel Outage	None
8. RBM Downscale	(1) (3)	Once/3 Months	None
9. SRM Upscale	(2) (3)	(2) (3)	(2)
10. SRM Detector Not in Startup Position	(2) (3)	(2) (3)	(2)
11. Scram Instrument Volume Level High	Once/3 Months (9)	None	None
Containment Monitoring			
1. Pressure			
a. Minus 5 in. Hg to plus 5 psig Indicator	None	Once/3 Months	Once/Day
b. -5 to +70 psig Indicator	None	Once/3 Months	None
2. Temperature	None	Refuel Outage	Once/Day
3. Drywell-Torus Differential Pressure (5) (6) (0-3 psid)	None	Once/6 Months (Two Channels Operable) Once/Month (One Channel Operable)	None
4. Torus Water Level (5) (6)			
a. Plus or minus 20 in. Narrow Range Indicator	None	Once/6 Months	
b. 40 in. Sight Glass			
Safety/Relief Valve Monitoring			
1. Safety/Relief Valve Position Indicator (Acoustic Monitor) (8)	(7)	None	Once Per 31 Days
2. Safety/Relief Valve Position Indicator (Temperature Monitor (8)	None	Once every 18 months	Once Per 31 Days
3. Safety Valve Position Indicator (Acoustic Monitor) (8)	(7)	None	Once Per 31 Days
4. Safety Valve Position Indicator (Temperature Monitor) (8)	None	Once every 18 months	Once Per 31 Days

(Table cont'd next page)

Table 4.2.4

Post Accident Monitoring Instrumentation Surveillance Requirements

Minimum Number of Operable Channels	Parameter	Instrument Readout Location Unit 2	Calibration	Instrument Check
1	Reactor Pressure	902-5, 3	Once Every 6 Months	Once Per Day
1	Reactor Water Level	902-3, 5	Once Every 6 Months	Once Per Day
1	Torus Bulk Water Temperature	902-4, 37	Once Every 12 Months	Once Per Day
	Torus Water Level Indicator (Narrow Range)	902-3	Once Every 6 Months	Once Per Day
2	(Sight Glass)		N/A	None
	(Wide Range)	902-2	Once Every 12 Months	Once Per 31 Days
1	Torus Pressure	902-3,5	Once Every 3 Months	Once Per Day
1	Torus to Drywell Differential Pressure	902-3	Once Every 6 Months	Once Per Day
2	Drywell Pressure			
	(0-5 psig)	902-5	Once Every 3 Months	Once Per Day
	(-5 to +70 psig)	902-3	Once Every 3 Months	Once Per 31 Days
	(-5 to +250 psig)	902-3	Once Every Refuel	Once Per 31 Days
2	Drywell Temperature	902-3	Once Every Refuel	Once Per Day
2	Neutron Monitoring	902-5	Once Every 3 Months	Once Per Day
1	Drywell Radiation Monitor	902-55,56	Once Every Refuel (2)	Once Per 31 Days
2/Valve	Main Steam RV Position, Temperature Monitor	902-21	Once Every Refuel	Once Per 31 Days
	Main Steam RV Position, Acoustic Monitor		(1)	
2/Valve	Main Steam SV Position, Temperature Monitor	902-21	Once Every Refuel	Once Per 31 Days
	Main Steam SV Position, Acoustic Monitor		(1)	Once Per 31 Days
1	Drywell Hydrogen Concentration	902-55 902-56	Once Every 3 Months	Once Per 31 Days

Notes: (See Next Page)

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4.2 SURVEILLANCE REQUIREMENT BASES (Cont'd.)

A more usual case is that the testing is not done independently. If both channels are bypassed and tested at the same time, the result is shown in Curve No. 3. Note that the minimum occurs at about 40,000 hours, much longer than for cases 1 and 2. Also, the minimum is not nearly as low as Case 2 which indicates that this method of testing does not take full advantage of the redundant channel. Bypassing both channels for simultaneous testing should be avoided.

The most likely case would be to stipulate that one channel be bypassed, tested and restored, and then immediately following, the second channel be bypassed, tested and restored. This is shown by Curve No. 4. Note that there is no true minimum. The curve does have a definite knee and very little reduction in system unavailability is achieved by testing at a shorter interval than computed by the equation for a single channel.

The best test procedure of all those examined is to perfectly stagger the tests. That is, if the test interval is four months, test one or the other channel every two months. This is shown in Curve No. 5. The difference between Cases 4 and 5 is negligible. There may be other arguments, however, that more strongly support the perfectly staggered tests, including reductions in human error.

The conclusions to be drawn are these:

1. A 1 out of n system may be treated the same as a single channel in terms of choosing a test interval; and

2. More than one channel should not be bypassed for testing at any one time.

The analog trip system consists of an analog sensor (transmitter) and a master/slave trip unit setup which ultimately drives a trip relay. The frequency of calibration and functional testing for instrument loops of the analog system, including reactor low water level, has been established in Licensing Topical Report NEDO-21617-A (December, 1978).

For instruments 2-2389A, B, C, D, the one-of-two-taken-twice logic exists, and NEDO-21617-A states that each trip unit be subjected to a calibration/test frequency (staggered one channel out of four per week) of one month. An adequate calibration/ surveillance test interval for the transmitter is once per operating cycle. -|

4.2 SURVEILLANCE REQUIREMENT BASES (Cont'd.)

For instruments 2-263-73A, 73B and 2-2352, 2353, the logic downstream of the output relay contacts exhibits a one-out-of-two logic and, by utilizing the Availability Criteria identified in NEDO-21617-A, each of these trip units should also be subjected to a calibration/test frequency (staggered one division out of two per two weeks) of one month. An adequate calibration/surveillance test interval for the transmitter is once per operating cycle.

The radiation monitors in the ventilation duct and on the refueling floor which initiate building isolation and standby gas treatment operation are arranged in two 1 out of 2 logic systems. The bases given above for the rod blocks applies here also and were used to arrive at the functional testing frequency.

Based on experience at Dresden Unit 1 with instruments of similar design, a testing interval of once every three months has been found to be adequate.

The automatic pressure relief instrumentation can be considered to be a 1 out of 2 logic system and the discussion above applies also.

The instrumentation which is required for the post accident condition will be tested and calibrated at regularly scheduled intervals. The basis for the calibration and testing of this instrumentation is the same as was discussed above for Protective Instrumentation in Table 4.2.4.

3.7 LIMITING CONDITION FOR OPERATION

CONTAINMENT SYSTEMS

Applicability:

Applies to the operating status of the primary and secondary containment systems.

Objective:

To assure the integrity of the primary and secondary containment systems.

Specification:

A. Primary Containment

1. At any time that the nuclear system is pressurized above atmospheric or work is being done which has the potential to drain the vessel, except as permitted by Specification 3.5.F.3, 3.5.F.4, the suppression pool water volume and bulk water temperature shall be maintained within the following limits.

   a. Maximum water volume - 115,655 ft^3

   b. Minimum water volume - 112,000 ft^3

4.7 SURVEILLANCE REQUIREMENTS

CONTAINMENT SYSTEMS

Applicability:

Applies to the primary and secondary containment integrity.

Objective:

To verify the integrity of the primary and secondary containment.

Specification:

A. Primary Containment

1. The surveillances are as follows:

   a. The suppression pool water level and bulk water temperature shall be checked once per day.

   b. Whenever there is indication of relief valve operation or

3.7 LIMITING CONDITION FOR OPERATION (Cont'd.)

4.7 SURVEILLANCE REQUIREMENTS (Cont'd.)

testing which adds heat to the suppression pool, the pool bulk water temperature shall be continually monitored and also observed and logged every 5 minutes until the heat addition is terminated.

c. Maximum bulk water temperature

(1) During normal power operation; maximum 95°F bulk water temperature.

(2) During testing which adds heat to the suppression pool, the bulk water temperature shall not exceed 10° F above the normal power operation limit specified in (1) above. In connection with such testing, the pool bulk water temperature must be reduced to below the normal power operation limit specified in (1) above within 24 hours.

c. Whenever there is indication of relief valve operation with the bulk water temperature of the suppression pool reaching 160°F or more and the primary coolant system pressure greater than 150 psig, an external visual examination of the suppression chamber shall be conducted before resuming power operation.

3.7 LIMITING CONDITION FOR OPERATION (Cont'd.)	4.7 SURVEILLANCE REQUIREMENTS (Cont'd.)
(3) The reactor shall be scrammed from any operating condition if the pool bulk water temperature reaches 110°F. Power operation shall not be resumed until the pool bulk water temperature is reduced below the normal power operation limit specified in (1) above.	
(4) During reactor isolation conditions, the reactor pressure vessel shall be depressurized to less than 150 psig at normal cooldown rates if the pool bulk water temperature reaches 120°F.	
d. Maximum downcomer submergence is 4.00 ft.	d. A visual inspection of the suppression chamber interior, including water line regions, shall be made at each major refueling outage.
e. Minimum downcomer submergence is 3.67 ft.	

Table 3.2.6
Post Accident Monitoring Instrumentation Requirements

Minimum Number of Operable Channels (1)	Parameter	Instrument Readout Location Unit 3	Number Provided	Instrument Range
1	Reactor Pressure	903-5	1	0-1500 psig
			2	0-1200 psig
		903-3	1	0-1500 psig
1	Reactor Water Level	903-3,5	3	-340 to +60 inches
1	Torus Bulk Water Temperature	903-4,37	2	0-300°F
2 (3)	Torus Water Level Indicator	903-3	1	-20 to +20 inches (narrow range)
		903-2	2	0-30 ft (wide range)
	Torus Water Local Sight Glass		1	40 inch range (narrow range)
1 (4)	Torus Pressure	903-5	1	-2.45 to +5 psig
2	Drywell Pressure	903-5	1	0-5 psig
		903-3	1	-5 to +70 psig
		903-3	2	-5 to +250 psig
2	Drywell Temperature	903-3	6	0-600°F
2	Neutron Monitoring	903-5	4	$0.1-10^6$ CPS
1 (4)	Torus to Drywell Differential Pressure	903-3	2	0-3 psid
1	Drywell Radiation Monitor	903-55,56	2	1 to 10^8 R/hr
2/valve (2)	Main Steam RV Position, Acoustic Monitor	903-21	1 per valve	N/A
	Main Steam RV Position, Temperature Monitor	903-21	1 per valve	0-600°F
2/valve (2)	Main Steam SV Position, Acoustic Monitor	903-21	1 per valve	N/A
	Main Steam SV Position, Temperature Monitor	903-21	1 per valve	0-600°F
1 (5)	Drywell Hydrogen Concentration	903-55 903-56	2	0-10%

Notes: (See Next Page)

Instrument Channel	Instrument Functional Test	Calibration	Instrument Check
ECCS Instrumentation			
1. Reactor Low-Low Water Level	(1)	Once/3 Months	Once/Day
2. Drywell High Pressure	(1)	Once/3 Months	None
3. Reactor Low Pressure	(1)	Once/3 Months	None
4. Containment Spray Interlock			
a. 2/3 Core Height	(1) (13)	(13)	None
b. Containment High Pressure	(1)	Once/3 Months	None
5. Low Pressure Core Cooling Pump Discharge	(1)	Once/3 Months	None
6. Undervoltage Emergency Bus	Refueling Outage	Refuel Outage	Once/3 months
7. Sustained High Reactor Pressure	(1)	Once/3 Months	None
8. Degraded Voltage Emergency Bus	Refueling Outage (10)	Refuel Outage	Monthly
Rod Blocks			
1. APRM Downscale	(1) (3)	Once/3 Months	None
2. APRM Flow Variable	(1) (3)	Refuel Outage	None
3. APRM Upscale (Startup/Hot Standby)	(2) (3)	(2) (3)	(2)
4. IRM Upscale	(2) (3)	(2) (3)	(2)
5. IRM Downscale	(2) (3)	(2) (3)	(2)
6. IRM Detector Not Fully Inserted in the Core	(2)	N/A	None
7. RBM Upscale	(1) (3)	Refuel Outage	None
8. RBM Downscale	(1) (3)	Once/3 Months	None
9. SRM Upscale	(2) (3)	(2) (3)	(2)
10. SRM Detector Not in Startup Position	(2) (3)	(2) (3)	(2)
11. Scram Instrument Volume Level High	Once/3 Months (9)	None	None
Containment Monitoring			
1. Pressure			
a. Minus 5 in. Hg to plus 5 psig Indicator	None	Once/3 Months	Once/Day
b. -5 to +70 psig Indicator	None	Once/3 Months	None
2. Temperature	None	Refuel Outage	Once/Day
3. Drywell-Torus Differential Pressure (5) (6) (0-3 psid)	None	Once/6 Months (Two Channels Operable) Once/Month (One Channel Operable)	None
4. Torus Water Level (5) (6)			
a. Plus or minus 20 in. Narrow Range Indicator	None	Once/6 Months	
b. 40 in. Sight Glass			
Safety/Relief Valve Monitoring			
1. Safety/Relief Valve Position Indicator (Acoustic Monitor) (8)	(7)	None	Once Per 31 Days
2. Safety/Relief Valve Position Indicator (Temperature Monitor (8)	None	Once every 18 months	Once Per 31 Days
3. Safety Valve Position Indicator (Acoustic Monitor) (8)	(7)	None	Once Per 31 Days
4. Safety Valve Position Indicator (Temperature Monitor) (8)	None	Once every 18 months	Once Per 31 Days

(Table cont'd next page)

Table 4.2.4

Post Accident Monitoring Instrumentation Surveillance Requirements

Minimum Number of Operable Channels	Parameter	Instrument Readout Location Unit 3	Calibration	Instrument Check
1	Reactor Pressure	903-3,5	Once Every 6 Months	Once Per Day
1	Reactor Water Level	903-3,5	Once Every 6 Months	Once Per Day
1	Torus Bulk Water Temperature	903-4,37	Once Every 12 Months	Once Per Day
	Torus Water Level Indicator (Narrow Range)	903-3	Once Every 6 Months	Once Per Day
2	(Sight Glass)		N/A	None
	(Wide Range)	903-2	Once Every 12 Months	Once Per 31 Days
1	Torus Pressure	903-3,5	Once Every 3 Months	Once Per Day
1	Torus to Drywell Differential Pressure	903-3	Once Every 6 Months	Once Per Day
2	Drywell Pressure			
	(0-5 psig)	903-5	Once Every 3 Months	Once Per Day
	(-5 to +70 psig)	903-3	Once Every 3 Months	Once Per 31 Days
	(-5 to +250 psig)	903-3	Once Every Refuel	Once Per 31 Days
2	Drywell Temperature	903-3	Once Every Refuel	Once Per Day
2	Neutron Monitoring	903-5	Once Every 3 Months	Once Per Day
1	Drywell Radiation Monitor	903-55,56	Once Every Refuel (2)	Once Per 31 Days
2/Valve	Main Steam RV Position, Temperature Monitor Main Steam RV Position, Acoustic Monitor	903-21	Once Every Refuel (1)	Once Per 31 Days
2/Valve	Main Steam SV Position, Temperature Monitor Main Steam SV Position, Acoustic Monitor	903-21	Once Every Refuel (1)	Once Per 31 Days Once Per 31 Days
1	Drywell Hydrogen Concentration	903-55 903-56	Once Every 3 Months	Once Per 31 Days

Notes: (See Next Page)

3.7 LIMITING CONDITION FOR OPERATION

CONTAINMENT SYSTEMS

Applicability:

Applies to the operating status of the primary and secondary containment systems.

Objective:

To assure the integrity of the primary and secondary containment systems.

Specification:

A. Primary Containment

1. At any time that the nuclear system is pressurized above atmospheric or work is being done which has the potential to drain the vessel, except as permitted by Specification 3.5.F.3, 3.5.F.4, or 3.5.F.5, the suppression pool water volume and bulk water temperature shall be maintained within the following limits.

   a. Maximum water volume - 115,655 ft^3

   b. Minimum water volume - 112,000 ft^3

4.7 SURVEILLANCE REQUIREMENTS

CONTAINMENT SYSTEMS

Applicability:

Applies to the primary and secondary containment integrity.

Objective:

To verify the integrity of the primary and secondary containment.

Specification:

A. Primary Containment

1. The surveillances are as follows:

   a. The suppression pool water level and bulk water temperature shall be checked once per day.

   b. Whenever there is indication of relief valve operation or

3.7 LIMITING CONDITION FOR OPERATION (Cont'd.)	4.7 SURVEILLANCE REQUIREMENTS (Cont'd.)
	testing which adds heat to the suppression pool, the pool bulk water temperature shall be continually monitored and also observed and logged every 5 minutes until the heat addition is terminated.
c. Maximum bulk water temperature (1) During normal power operation; maximum 95°F bulk water temperature. (2) During testing which adds heat to the suppression pool, the bulk water temperature shall not exceed 10° F above the normal power operation limit specified in (1) above. In connection with such testing, the pool bulk water temperature must be reduced to below the normal power operation limit specified in (1) above within 24 hours.	c. Whenever there is indication of relief valve operation with the bulk water temperature of the suppression pool reaching 160°F or more and the primary coolant system pressure greater than 150 psig, an external visual examination of the suppression chamber shall be conducted before resuming power operation.

3.7 LIMITING CONDITION FOR OPERATION (Cont'd.)	4.7 SURVEILLANCE REQUIREMENTS (Cont'd.)
(3) The reactor shall be scrammed from any operating condition if the pool bulk water temperature reaches 110°F. Power operation shall not be resumed until the pool bulk water temperature is reduced below the normal power operation limit specified in (1) above.	
(4) During reactor isolation conditions, the reactor pressure vessel shall be depressurized to less than 150 psig at normal cooldown rates if the pool bulk water temperature reaches 120°F.	
d. Maximum downcomer submergence is 4.00 ft.	d. A visual inspection of the suppression chamber interior, including water line regions, shall be made at each major refueling outage.
e. Minimum downcomer submergence is 3.67 ft.	

ATTACHMENT 2

SUMMARY OF PROPOSED CHANGES

BACKGROUND

Technical Specification changes are proposed to Table 3.2.6 (Post Accident Monitoring Instrumentation Requirements), Table 4.2.1 (Minimum Test and Calibration Frequency For Core and Containment Cooling Systems Instrumentation, Rod Blocks, and Isolations) and Table 4.2.4 (Post Accident Monitoring Instrumentation Surveillance Requirements) for Dresden Units 2 and 3. These changes are needed to reflect instrument enhancements which either have been completed or will be completed (prior to Unit 3 startup from the Spring, 1988 refueling outage) per Reg. Guide 1.97.

Regulatory Guide 1.97 required a review of each plant's post-accident monitoring capabilities. The following Dresden 2/3 instrumentation changes have been (or are being) made to meet associated requirements or to address Human Engineering Discrepancies (HEDs) identified during the Detailed Control Room Design Review (DCRDR).

1. Replacement of eight (8) Drywell Atmosphere Monitoring thermocouples by environmentally qualified thermocouples and cable in the Drywell and environmentally qualified cable from the Drywell to the Control Room. Two (2) thermocouples go to the main computer and input to SPDS. Six (6) thermocouples go to a recorder (1340-1) on panel 902(3)-3. The old thermocouples went to a recorder on a back panel. The response to one HED required a temperature recorder on a front panel to monitor the Drywell Atmosphere Temperature.

2. Recalibration of the midrange Drywell Pressure indication. The previous range has been 0 to 75 psig. It will be recalibrated to -5 to +70 psig. The -5 to +70 psig range allows monitoring the Drywell pressure over the full range of expected pressures under accident conditions.

3. Placement of a redundant wide range reactor vessel pressure indicator on panel 902(3)-3. Previously, wide range pressure indication in the Control Room consisted of a single pen indicator on a panel 902(3)-5 recorder. The new indicator satisfies the redundancy requirement of Regulatory Guide 1.97 for this parameter.

4. Placement of a wide range reactor vessel level pen indicator on a 902(3)-5 recorder fed from one of the existing wide range level channels. Previous wide range level indication consisted of two level indicators on panel 902(3)-3 fed from independent channels. The new pen indicator satisfies the Regulatory Guide 1.97 requirement requiring at least one continuously recorded channel for this parameter.

5. The torus water level sight glass range is changed from "18" to "40" inches. Also the two narrow ranges "-25 to +25 inches" and "-7 to +3 inches" are being combined to form one range, "-20 to +20 inches". A new wider range sight glass was installed to provide improved monitoring ability to ensure Technical Specification compliance and a new narrow range level instrument was installed with a range identical to the sight glass.

6. The torus water temperature range is changed from "0-200°F" to "0-300°F". New recorders were installed on panel 902(3)-4 that record "bulk water temperature" and receive input from the two recorders on panel 902(3)-37. Both panels are being referenced as readout locations for torus bulk water temperature.

The following clarifications and corrections are also proposed:

1. The phrase "torus bulk water temperature" replaces "torus water temperature" throughout the Technical Specifications, since the bulk temperature is the appropriate parameter to be used for all actions required by the Technical Specifications.

2. A typographical error is being corrected for the drywell pressure instrument range. The correct range is "-5 to +250 psig" and is incorrectly listed as "0-250 psig" in Tables 3.2.6 and 4.2.4.

3. In Unit 2 Technical Specifications, reference to Unit 3 analog instruments is being deleted as they are now included in the Unit 3 Technical Specifications, pages B 3/4.2-36 and B 3/4.2-37.

SPECIFIC CHANGES TO THE TECHNICAL SPECIFICATIONS

To reflect the above changes, specific page changes are proposed as listed in the following table. The affected pages are contained in Attachment 1 with the changes noted by sidebars.

DPR-19 and DPR-25 Page/Paragraph	Proposed Technical Specification Changes
Page 3/4.2-17, Table 3.2.6	Addition of a wide range (0-+1500 psig) reactor pressure indicator on the 902(3)-3 panel. Addition of an additional reactor water level read-out on panel 902(3)-5. The number of channels remains the same. Changed drywell pressure instrument ranges from: "0-250 psig" to "-5 to +250 psig" "0-70 psig" to "-5 to +70 psig" Changed the torus water level instrument range from "-25 to +25 inches" to "-20 to +20 inches". Deleted the second torus water level indicator range, "-7 to +3 inches". Changed the range of the torus water local sight glass from "18 inches" to "40 inches". Added the word "bulk" to the torus water temperature parameter. Included panel 902(3)-4 as a readout location for monitoring "torus bulk water temperature". Changed the torus water temperature instrument range from "0-200°F" to "0-300°F". Changed the drywell temperature location from panel 902(3)-21 to 902(3)-3. Changed the format for the torus pressure instrument range from "-2.45 - 5 psig" to "-2.45 to +5 psig".
Page 3/4.2-19, Table 4.2.1	Changed 1b. Containment Monitoring Pressure Indicator from "0-75 psig" to "-5 to +70 psig". Changed 4a. Containment Monitoring Torus Water Level Indicator from "25 in. wide range" to "20 in. narrow range". Changed 4b. Torus Water Level Sight Glass from "18" to "40" inches.

Page 3/4.2-26 (Table 4.2.4)	Added additional panel readout locations for reactor pressure (902(3)-3) and level (902(3)-5). Added the word "bulk" to torus water temperature and included on panel 902(3)-4. Changed the drywell pressure parameter ranges from: "0-75 psig" to "-5 to +70 psig" "0-250 psig" to "-5 to +250 psig" Changed the drywell temperature readout location from panel 902(3)-21 to 902(3)-3.
Page 3/4.7-1 Paragraphs: 3.7.A.1 4.7.A.1.a	Changed words to read "bulk water temperature" when referring to the suppression pool temperature.
Page 3/4.7-2 Paragraphs: 3.7.A.1.c 3.7.A.1.c.(1) 3.7.A.1.c.(2) 4.7.A.1.b 4.7.A.1.c	
Page 3/4.7-3 Paragraphs: 3.7.A.1.c.(3) 3.7.A.1.c.(4)	
Page B 3/4.2-36 (Bases) B 3/4.2-37 (Bases)	Unit 2 Only - Delete reference to Unit 3 for the following instruments: 2-2389A, B, C, D 2-263-73A, 73B 2-2352, 2353 The analog trip system has been installed on Unit 3 and is covered in the Unit 3 Technical Specifications.

ATTACHMENT 3

EVALUATION OF SIGNIFICANT HAZARDS CONSIDERATION

DESCRIPTION OF AMENDMENT REQUEST

The proposed revision to the Technical Specifications for Dresden Units 2 and 3 involves changing instrument ranges and panel locations for various parameters associated with Post-Accident and Containment Monitoring. The changes primarily affect Tables 3.2.6, 4.2.1 and 4.2.4 and also Section 3.7/4.7. Instrument ranges and/or panel locations associated with the following have been changed:

1. Drywell temperature
2. Drywell pressure
3. Reactor pressure
4. Reactor water level
5. Torus water level
6. Torus temperature

1. The drywell temperature readout location is changed from panel 902(3)-21 (a back panel) to 902(3)-3 (a front panel). This will aid the operator in monitoring the drywell temperature during normal and accident conditions, and also meets the requirements of Regulatory Guide 1.97.

2. The drywell pressure range for the +70 mid-range pressure transmitter is changed from "0-75 psig" to "-5 to 70 psig". This is being done to comply with requirements in Regulatory Guide 1.97, that capability to monitor drywell pressure exists if it should go negative.

3. A redundant wide range reactor vessel pressure indicator has been added on panel 902(3)-3. Previously, wide range pressure indication in the Control Room consisted of a single pen indicator on a panel 902(3)-5 recorder. The new indicator satisfies the redundancy requirement of Regulatory Guide 1.97 for this parameter.

4. A wide range reactor vessel level pen indicator has been placed on a 902(3)-5 recorder fed from one of the existing wide range level channels. Previous wide range level indication consisted of two level indicators on panel 902(3)-3 fed from independent channels. The new pen indicator satisfies the Regulatory Guide 1.97 requirement requiring at least one continuously recorded channel for this parameter.

5. The torus water level sight glass range is changed from "18" to "40" inches. Also the two narrow ranges "-25 to +25 inches" and "-7 to +3 inches" are being combined to form one range, "-20 to +20 inches". A new wider range sight glass was installed to provide improved monitoring ability to ensure Technical Specification compliance and a new narrow range level instrument was installed with a range identical to the sight glass.

6. The torus water temperature range is changed from "0-200°F" to "0-300°F". New recorders were installed on panel 902(3)-4 that record "bulk water temperature" and receive input from the two recorders on panel 902(3)-37. Both panels are being referenced as readout locations for torus bulk water temperature

Administrative changes are also included to:

(a) Correct a typographical error for the drywell pressure instrument range ("0-250 psig") to the correct range of "-5 to +250 psig" in Tables 3.2.6 and 4.2.4;

(b) To delete the reference to Unit 3 analog instruments in Unit 2 Technical Specifications since they have been included in the Unit 3 Technical Specifications (pages B 3/4.2-36 and B 3/4.2-37) per Amendment #89 to DPR-25; and

(c) Replaces "torus water temperature" throughout the Technical Specifications with "torus bulk water temperature". The bulk temperature is the appropriate parameter to be used for all actions required by the Technical Specifications.

BASIS FOR PROPOSED NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

Commonwealth Edison has performed an evaluation of potential hazards considerations associated with the proposed Technical Specification changes utilizing the criteria in 10 CFR 50.92 and has determined that they do not create a significant hazards consideration. Our evaluation is provided below and specifically addresses the three criteria in 10 CFR 50.92(c) for each of the changes described above.

1. The proposed changes do not involve a significant increase in the probability or consequence of an accident previously evaluated because the changes reflect the addition of instrumentation which serves similar purposes as existing instrumentation. Where ranges have been slightly modified, the parameter will continue to be monitored in a range that covers its design operating span. Panel locations for the instruments are listed in the Technical Specification tables for informational purposes so that updating the list to reflect additions or relocations (which increase redundancy or serve to enhance visibility for the operator, respectively) has no detrimental impact on accident probabilities or consequences. Similarly, clarifications or corrections of typographical errors are administrative changes which improve Technical Specification reliability and therefore can have no detrimental impact.

2. The proposed changes do not create the possibility of a new or different kind of accident from any accident previously evaluated because changing the specifications to reflect improved instrument ranges, redundancy, or visibility does not affect or change design operating limits or protective setpoints. The new ranges and panel changes continue to allow the parameters to be monitored during a post-accident situation or during normal operation. No new or different modes of operation are allowed by these changes or the proposed administrative changes. Nor will they affect any systems or equipment which could initiate an accident.

3. The proposed changes do not involve a significant reduction in a margin of safety because in no instance do these range changes panel changes or administrative changes affect the Technical Specification safety limits. The design operating limits and/or set points are sufficiently contained within the new ranges. Additionally, the range changes have no effect on the functional test or calibration frequencies required by these Technical Specification tables. All parameters will continue to be monitored as currently required.

The proposed changes fall within several of the examples of "no significant hazards considerations" found in the notice implementing the Sholly procedure.

a. Provisions which reflect the addition of instrumentation meet Example #2 for a change "that constitutes an additional limitation, restriction or control not presently included in the technical specifications".

b. Slight changes in instrument ranges meet either Example #2 or Example #7 i.e. a change "to conform a license to changes in the regulations, where the license change results in very minor changes to facility operations clearly in keeping with the regulations."

c. Technical specifications which reflect relocated or replaced instruments also meet Example #9b. for a repaired or replacement component or system which "does not result in a significant change to its safety function or a significant reduction in any safety limit (or limiting condition of operation) associated with the component or system."

For the reasons stated above, Commonwealth Edison finds that the proposed amendments do not involve a significant hazards consideration based on the criteria of 10 CFR 50.92(c). We therefore, request approval of the proposed amendment under the provisions of 10 CFR 50.91.(a)(4).