ATTACHMENT 1

PROPOSED CHANGES TO APPENDIX A

TECHNICAL SPECIFICATION FOR

DRESDEN STATION UNITS 2 AND 3

FACILITY OPERATING LICENSES DPR-29 AND DPR-30

REVISED PAGES:	3/4.5-1	(DPR-19 and 25)
	3/4.5-4	(DPR-19 and 25)
	3/4.5-5	(DPR-19 and 25)
	3/4.5-12	(DPR-19 and 25)
	3/4.5-13	(DPR-19 and 25)

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3.5 LIMITING CONDITION FOR OPERATION

CORE AND CONTAINMENT COOLING SYSTEMS

Applicability:

Applies to the operational status of the emergency cooling subsystems.

Objective:

To assure adequate cooling capability for heat removal in the event of a loss of coolant accident or isolation from the normal reactor heat sink.

Specification:

A. Core Spray and LPCI Subsystems

1. Except as specified in 3.5.A.2, 3.5.A.3, and 3.5.F.3 through 3.5.F.6 below, both core spray subsystems shall be operable whenever irradiated fuel is in the reactor vessel.

4.5 SURVEILLANCE REQUIREMENT

CORE AND CONTAINMENT COOLING SYSTEMS

Applicability:

Applies to periodic testing of the emergency cooling subsystems.

Objective:

To verify the operability of the emergency cooling subsystems.

Specification:

A. Surveillance of the Core Spray and LPCI Subsystems shall be performed as follows:

1. Core Spray Subsystem Testing:

Item	Frequency
a. Simulated Automatic Actuation Test	Each Refueling Outage
b. Flow Rate Test Core spray pumps shall deliver at least 4500 gpm against a system head corresponding	After pump maintenance and every 3 months

3.5 LIMITING CONDITION FOR OPERATION (Cont'd.)	4.5 SURVEILLANCE REQUIREMENT (Cont'd.)
for any reason, reactor operation is permissible only during the succeeding seven days unless it is sooner made operable, provided that during such seven 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.	the containment cooling subsystem, 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 thirty 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 cannot be met, an orderly shutdown of the reactor shall be initiated and the reactor shall be in the Cold Shutdown condition within 24 hours. Subsequently, the reactor may be placed in Refuel ~~for post maintenance testing of control rod drives only, provided no work is being performed which has the potential to drain the reactor vessel.~~	

in accordance with 3.5.F.3 through 3.5.F.6.

3.5 LIMITING CONDITION FOR OPERATION (Cont'd.)

B. Containment Cooling Subsystem

1. Except as specified in 3.5.B.2, 3.5.B.3, and 3.5.F.3 below, both containment cooling subsystem loops shall be operable whenever irradiated fuel is in the reactor vessel and reactor coolant temperature is greater than 212°F.

through 3.5.F.6

2. From and after the date that one of the containment cooling service water subsystem pumps is made or found to be inoperable for any reason, reactor operation is permissible only during the succeeding thirty days unless such pump is sooner made operable, provided that during such thirty days all other active components of the containment cooling subsystem are operable.

4.5 SURVEILLANCE REQUIREMENT (Cont'd.)

B. Surveillance of the Containment Cooling Subsystem shall be performed as follows:

1. Containment Cooling Service Water Subsystem Testing:

Item	Frequency
a. Pump & Valve Operability	Once/3 months
b. Flow Rate Test. Each containment cooling water pump shall deliver at least 3500 gpm against a pressure of 180 psig.	After pump maintenance and every 3 months

2. When it is determined that one containment cooling service water pump is inoperable, the remaining components of that subsystem and the other containment cooling subsystem shall be demonstrated to be operable immediately and daily thereafter.

3.5 LIMITING CONDITION FOR OPERATION (Cont'd.)

4.5 SURVEILLANCE REQUIREMENT (Cont'd.)

3. ~~When irradiated fuel is in the reactor vessel and reactor is 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.~~

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7 4. When irradiated fuel is in the reactor vessel and the reactor is in the refuel condition, the torus may be drained completely and control rod drive maintenance performed provided that the spent fuel pool gates are open, the fuel pool water level is maintained above the low level alarm point, and the minimum total condensate storage reserve is maintained at 230,000 gallons, and provided that not more than one control rod drive housing is open at one time, the control rod drive housing is blanked following removal of the control rod drive, no work is being performed in the reactor vessel while the housing is open and a special flange is

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3.5.F

3. When irradiated fuel is in the reactor vessel and the reactor is in cold shutdown or refuel conditions, at least two of the following pumps, with each having an operable flow path capable of taking suction from the suppression pool or the condensate storage tank and transferring the water to the reactor vessel, shall be operable except as specified in 3.5.F.4, 3.5.F.5 and 3.5.F.6 below:

   a. Two Core Spray pumps or,

   b. Two Low Pressure Coolant Injection pumps or,

   c. One Core Spray pump and one Low Pressure Coolant Injection pump.

4. With one of the pumps and/or associated flow paths required by 3.5.F.3 inoperable, restore at least two pumps and associated flow paths to operable status within 4 hours or suspend all operations with a potential for draining the reactor vessel.

5. With both of the pumps and/or associated flow paths required by 3.5.F.3 inoperable, suspend core alterations and all operations with a potential for draining the reactor vessel. Restore at least one pump and associated flow path to operable status within 4 hours or establish secondary containment integrity within the next 8 hours.

6. When irradiated fuel is in the reactor vessel and the reactor is in the cold shutdown or refuel condition, all low pressure core and containment cooling subsystems may be inoperable provided the reactor vessel head is removed, the cavity is flooded, the spent fuel pool gates are removed, the fuel pool water level is maintained above the low level alarm point, and the reactor cavity water temperature is below 140 °F.

3.5 LIMITING CONDITION FOR OPERATION (Cont'd.)	4.5 SURVEILLANCE REQUIREMENT (Cont'd.)
available which can be used to blank an open housing in the event of a leak.	
5. When irradiated fuel is in the reactor and the vessel head is removed, work that has the potential for draining the vessel may be performed with less than 112,000 ft^3 of water in the suppression pool, provided that: 1) the total volume of water in the suppression pool, dryer separator above the shield blocks, refueling cavity, and the fuel storage pool above the bottom of the fuel pool gate is greater than 112,000 ft^3; 2) the fuel storage pool gate is removed; 3) the low pressure coolant injection and core spray systems are operable as specified in 3.5.F.3, 3.5.F.4 and 3.5.F.5; and 4) the automatic mode of the drywell sump pumps is disabled.	
H. Maintenance of Filled Discharge Pipe	H. Maintenance of Filled Discharge Pipe
Whenever core spray, LPCI, or HPCI ECCS are required to be operable, the discharge piping from the pump discharge	The following surveillance requirements shall be adhered to, to assure that the discharge piping of the core spray,

3.5 LIMITING CONDITION FOR OPERATION

CORE AND CONTAINMENT COOLING SYSTEMS

Applicability:

Applies to the operational status of the emergency cooling subsystems.

Objective:

To assure adequate cooling capability for heat removal in the event of a loss of coolant accident or isolation from the normal reactor heat sink.

Specification:

A. Core Spray and LPCI Subsystems

1. Except as specified in 3.5.A.2, 3.5.A.3, and through 3.5.F.6 ~~3.5.F.3~~ below, both core spray subsystems shall be operable whenever irradiated fuel is in the reactor vessel.

4.5 SURVEILLANCE REQUIREMENT

CORE AND CONTAINMENT COOLING SYSTEMS

Applicability:

Applies to periodic testing of the emergency cooling subsystems.

Objective:

To verify the operability of the emergency cooling subsystems.

Specification:

A. Surveillance of the Core Spray and LPCI Subsystems shall be performed as follows:

1. Core Spray Subsystem Testing:

Item	Frequency
a. Simulated Automatic Actuation Test	Each Refueling Outage
b. Flow Rate Test Core spray pumps shall deliver at least 4500 gpm against a system head corresponding	After pump maintenance and every 3 months

3.5 LIMITING CONDITION FOR OPERATION (Cont'd.)	4.5 SURVEILLANCE REQUIREMENT (Cont'd.)
for any reason, reactor operation is permissible only during the succeeding seven days unless it is sooner made operable, provided that during such seven 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.	the containment cooling subsystem, 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 thirty 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 cannot be met, an orderly shutdown of the reactor shall be initiated and the reactor shall be in the Cold Shutdown condition within 24 hours. Subsequently, the reactor may be placed in Refuel ~~for post maintenance testing of control rod drives only, provided no work is being performed which has the potential to drain the reactor vessel.~~ in accordance with 3.5.F.3 through 3.5.F.6.	

3.5 LIMITING CONDITION FOR OPERATION (Cont'd.)	4.5 SURVEILLANCE REQUIREMENT (Cont'd.)
B. Containment Cooling Subsystem	B. Surveillance of the Containment Cooling Subsystem shall be performed as follows:
1. Except as specified in 3.5.B.2, 3.5.B.3, and 3.5.F.3 below, both containment cooling subsystem loops shall be operable whenever irradiated fuel is in the reactor vessel and reactor coolant temperature is greater than 212°F.	1. Containment Cooling Service Water Subsystem Testing: Item — Frequency a. Pump & Valve Operability — Once/3 months b. Flow Rate Test. Each containment cooling water pump shall deliver at least 3500 gpm against a pressure of 180 psig. — After pump maintenance and every 3 months
2. From and after the date that one of the containment cooling service water subsystem pumps is made or found to be inoperable for any reason, reactor operation is permissible only during the succeeding thirty days unless such pump is sooner made operable, provided that during such thirty days all other active components of the containment cooling subsystem are operable.	2. When it is determined that one containment cooling service water pump is inoperable, the remaining components of that subsystem and the other containment cooling subsystem shall be demonstrated to be operable immediately and daily thereafter.

through 3.5.F.6

3.5 LIMITING CONDITION FOR OPERATION (Cont'd.)

4.5 SURVEILLANCE REQUIREMENT (Cont'd.)

3. ~~When irradiated fuel is in the reactor vessel and reactor is 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.~~

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7 ~~4.~~ When irradiated fuel is in the reactor vessel and the reactor is in the refuel condition, the torus may be drained completely and control rod drive maintenance performed provided that the spent fuel pool gates are open, the fuel pool water level is maintained above the low level alarm point, and the minimum total condensate storage reserve is maintained at 230,000 gallons, and provided that not more than one control rod drive housing is open at one time, the control rod drive housing is blanked following removal of the control rod drive, no work is being performed in the reactor vessel while the housing is open and a special flange is

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3.5.F

3. When irradiated fuel is in the reactor vessel and the reactor is in cold shutdown or refuel conditions, at least two of the following pumps, with each having an operable flow path capable of taking suction from the suppression pool or the condensate storage tank and transferring the water to the reactor vessel, shall be operable except as specified in 3.5.F.4, 3.5.F.5 and 3.5.F.6 below:

   a. Two Core Spray pumps or,

   b. Two Low Pressure Coolant Injection pumps or,

   c. One Core Spray pump and one Low Pressure Coolant Injection pump.

4. With one of the pumps and/or associated flow paths required by 3.5.F.3 inoperable, restore at least two pumps and associated flow paths to operable status within 4 hours or suspend all operations with a potential for draining the reactor vessel.

5. With both of the pumps and/or associated flow paths required by 3.5.F.3 inoperable, suspend core alterations and all operations with a potential for draining the reactor vessel. Restore at least one pump and associated flow path to operable status within 4 hours or establish secondary containment integrity within the next 8 hours.

6. When irradiated fuel is in the reactor vessel and the reactor is in the cold shutdown or refuel condition, all low pressure core and containment cooling subsystems may be inoperable provided the reactor vessel head is removed, the cavity is flooded, the spent fuel pool gates are removed, the fuel pool water level is maintained above the low level alarm point, and the reactor cavity water temperature is below 140°F.

3.5 LIMITING CONDITION FOR OPERATION (Cont'd.)	4.5 SURVEILLANCE REQUIREMENT (Cont'd.)
available which can be used to blank an open housing in the event of a leak.	
5. When irradiated fuel is in the reactor and the vessel head is removed, work that has the potential for draining the vessel may be performed with less than 112,000 ft^3 of water in the suppression pool, provided that: 1) the total volume of water in the suppression pool, dryer separator above the shield blocks, refueling cavity, and the fuel storage pool above the bottom of the fuel pool gate is greater than 112,000 ft^3; 2) the fuel storage pool gate is removed; 3) the low pressure coolant injection and core spray systems are operable as specified in 3.5.F.3, 3.5.F.4 and 3.5.F.5; and 4) the automatic mode of the drywell sump pumps is disabled.	
H. Maintenance of Filled Discharge Pipe	H. Maintenance of Filled Discharge Pipe
Whenever core spray, LPCI, or HPCI ECCS are required to be operable, the discharge piping from the pump discharge	The following surveillance requirements shall be adhered to, to assure that the discharge piping of the core spray,

ATTACHMENT 2

SUMMARY OF CHANGES

The following changes to the Dresden Station Units 2 and 3 Technical Specifications have been identified as a result of the proposed license amendment.

1) Page 3/4.5-1 (DPR-19 and 25)

(a) Technical Specification 3.5.A.1. - Limiting Condition of Operation (LCO) - Insert the phrase "through 3.5.F.6" between "3.5.F.3" and the word "below", so the specification reads, "except as specified in 3.5.A.2, 3.5.A.3, and 3.5.F.3 through 3.5.F.6 below,"...

This change adds a reference to new paragraph 3.5.F.4 through 3.5.F.6 in exceptions to Core Spray and LPCI operability requirements.

2) Page 3/4.5-4 (DPR-19 and 25)

(a) Technical Specification 3.5.A.7, LCO - Following the words, "subsequently, the reactor may be placed in Refuel" delete the remaining phrase and replace with the words "in accordance with 3.5.F.3 through 3.5.F.6.", so the specification now reads "subsequently, the reactor may be placed in Refuel in accordance with 3.5.F.3 through 3.5.F.6."

This proposed revision changes the action statement for not meeting 3.5.A to allow the reactor to be placed in Refuel in accordance with 3.5.F.3 through 3.5.F.6.

3) Page 3/4.5-5 (DPR-19 and 25)

(a) Technical Specification 3.5.B.1., LCO - Insert the phrase "through 3.5.F.6" between "3.5.F.3" and the word "below", so the specification reads, "except as specified in 3.5.B.2, 3.5.B.3, and 3.5.F.3 through 3.5.F.6 below,..."

This change adds reference to new paragraph 3.5.F.4 through 3.5.F.6 in exceptions to Containment Cooling subsystem operability requirement.

4) Page 3/4.5-12 (DPR-19 and 25)

(a) Technical Specification 3.5.F.3, LCO - Delete specification 3.5.F.3 and replace with new specifications 3.5.F.3, 3.5.F.4, 3.5.F.5, 3.5.F.6 which reads as follows:

(1) 3.5.F.3, LCO - "When irradiated fuel is in the reactor vessel and the reactor is in cold shutdown or refuel conditions...and one Low Pressure Coolant Injection pump."

(2) 3.5.F.4, LCO - "With one of the pumps and/or associated flow...for draining the reactor vessel."

(3) 3.5.F.5, LCO - "With both of the pumps and/or associated flow...or establish secondary containment integrity within the next 8 hours."

(4) 3.5.F.6, LCO - "When irradiated fuel is in the reactor vessel and the reactor is in the cold shutdown or refuel condition...water level is maintained above the low level alarm point, and the reactor cavity water temperature is below 140°F."

The proposed change revises the existing Specification 3.5.F.3 and replaces it with new Specifications 3.5.F.3, 3.5.F.4, 3.5.F.5, and 3.5.F.6. Additionally, the change results in the renumbering of present Specification 3.5.F.4 which becomes "3.5.F.7". The renumbering of the Technical Specifications is considered to be an administrative change. The proposed change will add new requirements for ECCS system operability while in cold shutdown and refuel.

5) Page 3/4.5-13 (DPR-19 and 25)

(a) Existing Technical Specification 3.5.F.5 (now renumbered to be 3.5.F.8), LCO - Following the word "operable" insert the phrase "as specified in 3.5.F.3, 3.5.F.4 and 3.5.F.5", so the sentence reads, "3) the low pressure coolant injection and core spray systems are operable as specified in 3.5.F.3, 3.5.F.4 and 3.5.F.5; and..."

The proposed change renumbers present Specification 3.5.F.5 to 3.5.F.8. This change is considered to be administrative in nature. Additionally, the specification revised the provision concerning operability of the low pressure coolant injection and core spray systems to reference 3.5.F.3, 3.5.F.4 and 3.5.F.5. This is an administrative change to the Technical Specifications.

ATTACHMENT 3

EVALUATION OF SIGNIFICANT HAZARDS CONSIDERATION

AND DESCRIPTION OF PROPOSED AMENDMENT REQUEST

ECCS REQUIREMENTS IN COLD SHUTDOWN AND REFUELING

Present Specification 3.5.F.3 allows all low pressure core and containment cooling systems to be inoperable while in cold shutdown provided no work is being done which has the potential for draining the reactor vessel. The present requirements do not address specific ECCS operability requirements during cold shutdown or refueling conditions.

The proposed change will rewrite present Specification 3.5.F.3 and replace its with more prescriptive requirements for ECCS operability during cold shutdown and refueling. The proposed Specification will be applicable when the reactor is in cold shutdown or refuel conditions with irradiated fuel in the reactor vessel and will require at least two pumps of low pressure ECCS to be operable along with an operable flow path for each pump taking suction from the suppression pool or the condensate storage tank and transferring water to the reactor vessel. These pumps can be two Core Spray pumps, two Low Pressure Coolant Injection pumps, or a Core Spray pump and a LPCI pump. Proposed Specifications 3.5.F.4 and 3.5.F.5 will provide action requirements if one or both of the required ECCS systems are inoperable. Proposed Specification 3.5.F.6 allows all low pressure core and containment cooling subsystems to be inoperable when the reactor is in the cold shutdown or refueling conditions and irradiated fuel is in the reactor vessel, provided that the reactor vessel head is removed, the reactor cavity is flooded, and the spent fuel pool water level is maintained above the low level alarm point with the pool to cavity gates removed.

The changes are being proposed in order to provide specific operability requirements for low pressure ECCS systems while the reactor is in cold shutdown and refueling conditions. Present Dresden Technical Specifications require LPCI and both Core Spray subsystems to be operable whenever irradiated fuel is in the reactor vessel with an exception being that all the subsystems may be inoperable in cold shutdown provided no work is being done which has the potential for draining the reactor vessel. Also, Containment Cooling is required whenever irradiated fuel is in the reactor vessel and reactor coolant temperature is greater than 212°F with the same exception as for the LPCI and Core Spray subsystems while in the cold shutdown. Since the primary system is not pressurized in cold shutdown or refuel, the ECCS water makeup requirements are significantly less than for the conditions of reactor power operation or hot shutdown. Proposed Specification 3.5.F.3 requires at least two low pressure ECCS pumps to be operable when irradiated fuel is in the reactor vessel and the reactor is in cold shutdown or refuel conditions. The proposed requirements follow Standard Plant and later BWR operating plant requirements for ECCS systems during these modes of operation.

The proposed action requirements of Specification 3.5.F.4 will not allow operations with a potential for draining the reactor vessel to continue if one of the required pumps and/or associated flow paths of ECCS is inoperable for more than 4 hours. The four hour requirement also is of sufficiently short duration such that the probability is very small that an accident that results in draining the reactor will occur in this equipment out of service period.

Proposed action requirements in Specification 3.5.F.5 apply if both of the required ECCS pumps and/or flow paths are inoperable. With both of the ECCS pumps and/or flow path(s) inoperable, core alterations and all operations with a potential for draining the reactor vessel are suspended. At least one of the required ECCS pumps and associated flow path must be returned to operable status within four hours or secondary containment integrity must be established within the next 8 hours. The four hour allowance provides a reasonable timeframe to restore the inoperable components or to make another pump and/or associated flow path operable. The eight hour time requirement for establishing secondary containment integrity allows a reasonable time for re-establishing the secondary containment boundary, if required.

Proposed Specification 3.5.F.6 is similar to present Specification 3.5.F.3 in that all low pressure core and containment cooling subsystems are allowed to be inoperable in cold shutdown. The proposed change adds the refuel condition but also includes the restrictions of having the reactor vessel head removed, the cavity flooded, the spent fuel pool gates removed, and fuel pool water level maintained above the low level alarm point. These additional restrictions apply to both cold shutdown and refuel conditions and ensure that the reactor head is removed and a large volume of water is available in the reactor cavity and spent fuel areas before all low pressure core and containment cooling subsystems can be made inoperable.

The proposed change to Specification 3.5.F.5 will delete the requirement for low pressure coolant injection and core spray systems to be operable. The requirement is contained in proposed Specifications 3.5.F.3, as discussed above, and does not need to be in Specification 3.5.F.5.

BASIS FOR NO SIGNIFICANT HAZARDS CONSIDERATION

Commonwealth Edison has evaluated this proposed amendment and determined that it involves no significant hazards consideration. In accordance with the criteria of 10 CFR 50.92(c) the proposed amendment does not:

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

The proposed amendment maintains necessary ECCS pumps and flow paths to provide makeup water to the reactor vessel in the cold shutdown and refuel conditions. The proposed action provisions ensure that operations with a potential for draining the reactor vessel or core alterations are not performed without ECCS makeup capability or the reactor cavity water inventory maintained above the fuel pool low level alarm point. As an additional restriction, with both of the required ECCS pumps and/or associated flow paths inoperable, secondary containment integrity is established. Standard Technical Specifications permit current BWR operations at other plants during similar conditions such that two ECCS pumps with associated flow paths to the reactor are available to provide sufficient makeup capability for accidents that have a potential to drain the vessel. Necessary ECCS makeup capability is maintained. Therefore, this does not involve a significant increase in the probability or consequences from an accident previously evaluated.

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

The proposed change maintains necessary ECCS makeup capability during cold shutdown and refueling conditions. The proposed changes add restrictions for taking all low pressure code and containment cooling systems out of service during cold shutdown and refueling conditions. These restrictions ensure that sufficient water volume is available in the reactor cavity and refueling pools before taking all these systems out of service. The proposed changes do not introduce any new modes of operation and maintain necessary ECCS availability and as a result do not create the possibility of a new or different kind of accident than previously evaluated.

3) Involve a significant reduction is the margin of safety because:

The proposed change will allow fewer ECCS systems to be required operable in cold shutdown and refueling conditions than is required by present specifications. However, the present specifications are overly restrictive and do not reflect the difference in water makeup requirements for reactor power operation conditions and cold shutdown conditions. With the reactor not pressurized in cold shutdown and refueling conditions, the ECCS makeup requirements are less than when in the pressurized condition. Later BWR plants similarly require that two ECCS pumps with associated flow paths to the reactor be available to provide sufficient water makeup capability for the cold shutdown and refueling conditions. The added action requirements if one or both of the required ECCS pumps and/or associated flow paths are inoperable ensures that operations such as core alterations and those with a potential for draining the vessel are not conducted without ECCS

makeup capability or the reactor cavity water inventory maintained above the fuel pool low level alarm point. In addition, the actions proposed will require establishing secondary containment integrity if the required ECCS pumps and/or associated flow paths are not returned to operable status.

Restrictions are also added to present Specification 3.5.F.3 requirements concerning all low pressure core and containment cooling systems being allowed out of service during the cold shutdown condition. These restrictions require the reactor vessel head to be removed, the cavity to be flooded, the spent fuel pool gates to be removed, and the fuel pool water level to be maintained above the low level alarm point. These added restrictions are also being applied to the refueling condition and add restrictions not presently in the Technical Specifications.

The present margin of safety is not significantly affected because necessary ECCS water makeup capability for the cold shutdown and refueling conditions is being maintained and additional restrictions are being imposed before taking all low pressure core and containment cooling systems out of service. Hence, the changes do not result in a significant decrease in the margin of safety.

Therefore, since the proposed license amendment satisfies the criteria specification in 10 CFR 50.92, Commonwealth Edison has determined that no significant hazards consideration exists for these items. We further request their approval in accordance with the provisions of 10 CFR 50.91(a)(4).