

ATTACHMENT 2

Proposed Technical Specification Changes
For The Reactor Protection System
Electrical Protection Assemblies

- a. Dresden Unit 2, DPR-19: page 3/4.1-2
- b. Dresden Unit 3, DPR-25: page 3/4.1-2

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3.1 LIMITING CONDITIONS FOR OPERATION
(Cont'd.)

- a. The APRM scram and rod block settings shall be reduced to the values given by the equations in Specifications 2.1.A.1 and 2.1.B. This may be accomplished by increasing APRM gains as described therein.
- b. The power distribution shall be changed such that the fuel design limiting ratio for centerline melt (FDLRC) for any fuel assembly no longer exceeds 1.0.

- 3. Two RPS electric power monitoring channels for each inservice RPS MG set or alternate source shall be OPERABLE at all times.

4.1 SURVEILLANCE REQUIREMENTS
(Cont'd.)

- a. Maximum fuel design limiting ratio for centerline melt (FDLRC).

- b. Deleted

- 3. The RPS power monitoring system instrumentation shall be determined OPERABLE:

- a. ~~At least once per 6 months by performing a CHANNEL FUNCTIONAL TEST, and~~

By performance of a CHANNEL FUNCTIONAL TEST each time the unit is in COLD SHUTDOWN for a period of more than 24 hours, unless performed in the previous 6 months.

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ATTACHMENT 3

DETERMINATION OF NO SIGNIFICANT HAZARDS

FOR THE PROPOSED CHANGES TO APPENDIX A

TECHNICAL SPECIFICATIONS FOR

RPS EPA SURVEILLANCE

FACILITY OPERATING LICENSES DPR-19 AND DPR-25

Significant Hazards Evaluation

Commonwealth Edison proposes to amend Licenses DPR-19 and DPR-25 to specify RPS EPA functional testing only with the unit in cold shutdown.

Basis for Proposed No Significant Hazards Consideration Determination

Commonwealth Edison has evaluated the proposed Technical Specification change and determined that it does not represent a significant hazard consideration. Based on the criteria for defining a significant hazard established in 10CFR50.92(c), operation of Dresden Units 2 and 3 in accordance with the proposed change will not:

- a) Involve a significant increase in the probability or consequences of an accident previously evaluated.

This proposed Technical Specification change will preclude the need to test the RPS EPA breakers during power operation of the units. This will ensure that no Primary Containment Isolations or reactor scrams from power occur during performance of this surveillance. This will prevent unwarranted challenges to the Reactor Protection and Primary Containment Isolation systems. In addition, this change does not affect the ability of the Reactor Protection System to maintain the integrity of the fuel cladding, protect the reactor coolant pressure boundary, or limit the amount of energy released to primary containment.

- b) Create the possibility of a new or different kind of accident from any accident previously evaluated.

This Technical Specification change does not affect the operability of the RPS EPA breakers. The demonstrated high reliability of the EPA breakers ensures that the breakers will be capable of performing as designed in the event of an abnormal condition on a RPS bus. In addition, this change will eliminate any unexpected Reactor Protection System actuations at power during performance of RPS EPA breaker functional testing.

- c) Involve a significant reduction in the margin of safety.

This Technical Specification change ensures that a spurious RPS trip does not result in a Primary Containment Isolation and reactor scram at power during RPS EPA functional testing. The availability of the EPA breakers to perform their required function remains the same; therefore, the margin of safety is unchanged.

ATTACHMENT 4

Previous Request for EPA Technical Specification Relief

- a. Letter from J.A. Silady to A.B. Davis
dated November 7, 1989
- b. Letter from A.B. Davis to Cordell Reed
dated November 13, 1989