

Commonwealth Edison Company

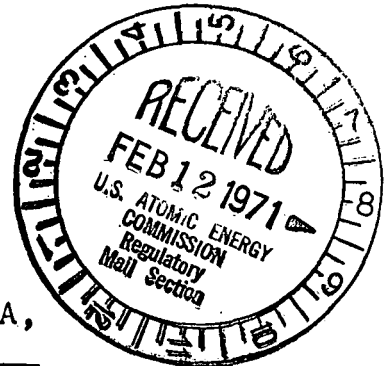
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February 10, 1971

Dr. Peter A. Morris, Director
Division of Reactor Licensing
U.S. Atomic Energy Commission
Washington, D.C. 20545



Subject: Proposed Change No. 1 to Appendix A,
DPR-25, AEC Dkt 50-249

Dear Dr. Morris:

Pursuant to Section 50.59 of 10 CFR Part 50 and paragraph 3.B of Facility License DPR-25, Commonwealth Edison hereby submits Proposed Change No. 1 to Appendix A of DPR-25 (Dresden Unit 3). The purpose of the changes requested is to establish operational action limits for the release of gaseous activity, except of halogens and particulates with half lives longer than eight days. These changes are intended to minimize the releases from Dresden Unit 2 and Unit 3. The changes requested in this proposed change are in Section 3.8 on Radioactive Materials. The specific changes are as follows:

1 - Change Specification 3.8.A.2 item a. as follows:

"a. The site release rate for gross activity, except for halogens and particulates with half lives longer than eight days, shall not exceed:

$$\frac{Q_1}{0.56} + \left[\frac{Q_2}{0.7} \text{ or } \frac{Q_{2,3}}{0.9} \right]^* + \frac{Q_{RS}}{0.09} \leq 1$$

where Q is measured in Curies/sec."

2 - Add to Specification 3.8.A.2 item b. as follows:

"b. In addition to any other requirements of these technical specifications the licensee has volunteered:

- (1) During reactor power operation of Units 2 and/or 3, operating procedures will be implemented to reduce release rates to those consistent with 3.8.E of these specifications prior to the release rate for gross activity, except for halogens and particulates with half lives longer than eight days, exceeding 0.105 ci/sec with Unit 2 or 3 operating alone, or 0.135 ci/sec for both units operating simultaneously.

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- (2) The release rates specified in 3.8.A.2.b.(1) shall not be exceeded for a time period in excess of that established by the following equations:

$$\text{Dresden 2 or 3 operating} \quad t = \frac{560}{Q_x}$$

$$\text{Dresden 2 and 3 operating} \quad t = \frac{720}{Q_y}$$

where

t = cumulative hours of operation permitted at release rate Q_x or Q_y , or above in the 12 months ending with the month for which the calculation is made

Q_x = release rate above 0.105 ci/sec for Dresden Unit 2 or Unit 3 operating separately

Q_y = release rate above 0.135 ci/sec when both Dresden Units 2 and 3 are operating simultaneously.

- (3) If the limits of 3.8.A.2.b.(1) are exceeded for a period of greater than 48 hours, the licensee shall then notify the Director, Division of Reactor Licensing in writing within 48 hours of its plans for reducing the effluent release rate to a level which is consistent with Section 3.8.E of these specifications."

- 3 - Delete present Specification 3.8.A.2.b and add Specification 3.8.A.2.c as follows:

"c. The summation of release rates of halogens and particulates with half lives longer than 8 days released to the environs as part of the airborne effluents shall not exceed:

$$\frac{Q_1}{2.4 \times 10^{-6}} + \left[\frac{Q_2}{3.5 \times 10^{-6}} \text{ or } \frac{Q_{2,3}}{4.3 \times 10^{-6}} \right]^* + \frac{Q_{RS}}{0.12 \times 10^{-6}} \leq 1.0$$

where Q is measured in Curies/sec.

(Note for equations 3.8.A.2.a and c):

*Where the term in parentheses represents the operational status of Units 2 and 3. If either Units 2 or 3 is shut down, then the first term (Q_2/value) shall be used. If both units are in operation, then the second term ($Q_{2,3}/\text{value}$) shall be used."

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- 4 - Revise Specification 3.8.A.3 to read as follows and delete Footnote a:

"If the limits of 3.8.A.2.a, or 3.8.A.2.c are exceeded, an orderly load reduction of the unit(s) causing these limits to be exceeded shall be initiated immediately to reduce the releases below the limits of 3.8.A.2.a or 3.8.A.2.c."

- 5 - Revise Specification 3.8.E to read as follows:

"E. General

It is expected that releases of radioactive material in effluents will be kept at small fractions of the limits specified in Section 20.106 of 10 CFR Part 20. Specifications 3.8.A.2.b allow the licensee the flexibility of operation, which is compatible with considerations of health and safety, to assure that the public is provided a dependable source of power even under unusual operating conditions which may temporarily result in releases higher than the normal small fractions but still within the limits specified in Section 20.106 of 10 CFR Part 20. It is expected that in using this operational flexibility under unusual operating conditions the licensee will exert his best efforts to keep levels of radioactive materials in effluents as low as practicable."

- 6 - Add to the Bases under paragraph A following the third paragraph the following:

"The intent of Section 3.8.A.2.b is not to relieve the licensee of its obligation to exert its best efforts to keep levels of radioactive material in effluents as low as practicable. At the action level specified in Section 3.8.A.2.b, the Commission is to be informed of the licensee's plans for continued operation of the facilities.

The equations given in Specification 3.8.A.2.b.2 give the cumulative hours which represent the limits of permissible operation which reduce the permissible activity released compared to continuing operation at the conditions stated in Section 20.106 of 10 CFR Part 20. The time periods under discussion permit short-term releases higher than small fractions of the limits specified in Section 20.106 of 10 CFR Part 20.

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In addition, Commonwealth Edison has embarked on a program of selecting, designing, and installing additional equipment to reduce off-gas emissions on Dresden Units 2 and 3. This equipment is expected to reduce substantially the releases of radioactive material in the effluent. Commonwealth Edison will submit a description of its proposed design for this equipment, and a schedule for its installation, prior to June 1, 1971, unless an extension of this time is granted. Upon completion of the installation of this equipment, these Technical Specifications will be revised to include the effect of operation of the emission-reducing equipment."

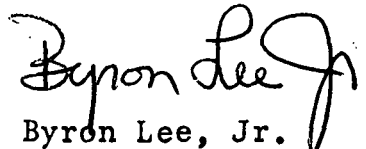
In our opinion, the proposed change does not result in hazards different from or greater than those analyzed in the Final Safety Analysis Report. Specifically, there is (1) no increase in the probability of, or (2) no increase in the possible consequences of, or (3) no creation of a credible probability of an accident or equipment malfunction different from those previously evaluated in the FSAR.

In addition, the margin of safety as defined in the Bases for Technical Specification 3.8 is increased.

Proposed Change No. 1 has been reviewed and approved by Commonwealth Edison's Nuclear Review Board.

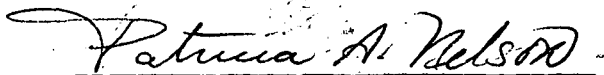
In addition to three signed originals, 19 copies of Proposed Change No. 1 are also submitted.

Very truly yours,



Byron Lee, Jr.
Assistant to the President

SUBSCRIBED and SWORN to
before me this 10th day
of February, 1971.


Patricia A. Nelson
Notary Public