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Regulatory File Cy

March 3, 1976

Mr. Benard C. Rusche, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Subject: Dresden Station Units 2 and 3
Proposed Amendment to Appendix A of
Facility Operating Licenses DPR-19
and DPR-25, NRC Dkts. 50-237 and 50-249

Dear Mr. Rusche:

Pursuant to 10 CFR 50.59, Commonwealth Edison proposes to add a new Section 3.5.F.5 to Appendix A of the Technical Specifications. The changes proposed are shown on the attached revised pages 81, 85, and 108.

The proposed change is similar to that of Section 3.5.F.4 authorized for Quad-Cities Station Unit 2, DPR-30. The change authorizes work with the potential for draining the core with less than the minimum volume of water in the torus provided the combined volume of the water in the torus and reactor cavity equal the minimum torus water volume.

Two differences from the Quad-Cities specification are proposed. Inasmuch as the Dresden units have shutdown cooling systems for removal of decay heat, the requirement for the containment cooling system has been deleted from this specification. Section 3.5.B.1 of the present specification does not require containment cooling system operability below 212°F reactor water temperature.

The requirement to defeat the automatic start feature of the drywell sumps is deleted because its impact on a potential loss of coolant accident is too trivial to be classified as a limiting condition for operation. The radwaste system could not possibly handle the volume of water necessary to impact the ability to maintain core cooling. In the event absolutely no operator action was taken following the development of a leak, the drywell pumps would trip and isolate at 143 inches above the top of the active fuel.

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Maintaining the normal sump pump lineup is desirable to quickly determine if the drywell leakage changes, to minimize the possibility of contaminating the drywell floor due to sump overflow, and to avoid another abnormal system lineup during the refueling outage.

The needs for the specification are the same as those contained in the request for change of Quad-Cities Unit 2, DPR-30, in my letter to you dated October 15, 1975. In addition, this change will facilitate the torus paint and baffle inspection during the Dresden Unit 2 outage.

Approval of this specification is needed by mid March 1976 for the Dresden Unit 2 refueling outage. The change is requested for Dresden Unit 3 in order to maintain consistency in the wording of DPR-19 and DPR-25.

This change has received Onsite and Offsite Review.

Three (3) signed originals and 37 copies are enclosed for your use.

Very truly yours,

Byron Lee, Jr.
Vice-President

Enclosure

SUBSCRIBED and SWORN to
before me this 3rd day
of March, 1976.

Nancy M Hollingsworth
Notary Public

3.7 LIMITING CONDITION FOR OPERATION	4.7 SURVEILLANCE REQUIREMENTS

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 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 carried on 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; and 3) the low pressure coolant injection and core spray systems are operable.

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 of these systems to the last check valve shall be filled.

H. Maintenance of Filled Discharge Pipe

The following surveillance requirements shall be adhered to, to assure that the discharge piping of the core spray, LPCI, and HPCI are filled:

Dresden Units 2 and 3 share certain process systems such as the makeup demineralizers and the radwaste system and also some safety systems such as the standby gas treatment system, batteries, and diesel generators. All of these systems have been sized to perform their intended function considering the simultaneous operation of both units.

For the safety related shared features of each plant, the Technical Specifications for that unit contain the operability and surveillance requirements for the shared feature; thus, the level of operability for one unit is maintained independently of the status of the other. For example, the shared diesel (2/3 diesel) would be mentioned in the specifications for both Units 2 and 3 and even if Unit 3 were in the Cold Shutdown Condition and needed no diesel power, readiness of the 2/3 diesel would be required for continuing Unit 2 operation.

F. Specification 3.5.F.4 provides that should this occur, no work will be performed which could preclude adequate emergency cooling capability being available. Work is prohibited unless it is in accordance with specified procedures which limit the period that the control rod drive housing is open and assures that the worst possible loss of coolant resulting from the work will not result in uncovering the reactor core. Thus, this specification assures adequate core cooling. Specification 3.9 must be consulted to determine other requirements for the diesel generator.

Specification 3.5.F.5 provides assurance that an adequate supply of coolant water is immediately available to the low pressure core cooling systems and that the core will remain covered in the event of a loss of coolant accident while the reactor is depressurized with the head removed.

H. Maintenance of Filled Discharge Pipe - If the discharge piping of the core spray, LPCI, and HPCI are not filled, a water hammer can develop in this piping when the pump and/or pumps are started.

3.7 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 temperature shall be maintained within the following limits.

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

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

   c. Maximum water temperature

      (1) During normal power operation - 95°F.

      (2) During testing which adds heat to the suppression pool, the water temperature shall not exceed 10°F above the normal power operation limit specified in (1)

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

   b. Whenever there is indication of relief valve operation or testing which adds heat to the suppression pool, the pool temperature shall be continually monitored and also observed and logged every 5 minutes until the heat addition is terminated.

   c. Whenever there is indication of relief valve operation with the 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.