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June 28, 1976

Director of Nuclear Reactor Regulation
Attn: Ms. Rela Diggs
Division of Operating Reactors
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Subject: Dresden Station Units 2 and 3
Proposed Amendment to Technical
Specification Appendix A to DPR-19 and DPR-25
NRC Docket Nos. 50-237, 50-249

Reference (a): R. L. Bolger letter of June 23, 1976 to
B. C. Rusche. NRC Docket Nos. 50-237, 50-249

Dear Ms. Diggs:

Enclosed are the amended technical specification changes which should have accompanied reference (a). Reference (a) indicated forty (40) copies of the changes for each unit were enclosed, but the pages are identical for both units making the additional copies unnecessary. Please insert these pages with the submittal per our telephone conversation Friday, June 25, 1976.

Thank you very much for your assistance.

Very truly yours,

G. A. Abrell
Nuclear Licensing Administrator

Enclosures

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Pages 117a, 117b, and 126a are deleted.

Each drywell-suppression chamber vacuum breaker is fitted with a redundant pair of position switches which provide signals of disk position to panel mounted indicators and annunciate an alarm in the control room if the disk is open more than allowable. The alarm systems meet the intent of IEEE 279 standards. The quality of the alarm system justifies continued reactor operation for 15 days between differential pressure decay rate tests if one alarm system is inoperable for one or more operable vacuum breakers.

Analyses provided in Dresden Station Special Reports No. 39 and No. 40 demonstrate that the quantity of metal-water reaction calculated for a loss of coolant accident (LOCA) in accordance with 10 CFR 50.46 and 10 CFR 50 Appendix K will not generate sufficient hydrogen gas to create a flammable mixture in the primary containment.

In order to ensure the containment atmosphere remains below flammability limits the capability to purge through the standby gas treatment system is provided. Purging will only be necessary to control the long term buildup of radiolytic hydrogen and oxygen.

B. Standby Gas Treatment System and C Secondary Containment -

The secondary containment is designed to minimize any ground level release of radioactive materials which might result from a serious accident. The reactor building provides secondary containment during reactor operation, when the drywell is sealed and in service; the reactor building provides primary containment when the reactor is shutdown and the drywell is open, as during refueling. Because the secondary containment is an integral part of the complete system, secondary containment is required at all times that primary containment is required as well as during refueling.

The standby gas treatment system is designed to filter and exhaust the reactor building atmosphere to the stack during secondary containment isolation conditions, with a minimum release of radioactive materials from the reactor building to the environs. One standby gas treatment fan is designed to automatically start upon containment isolation and to maintain the reactor building pressure to approximately a negative 1/4-inch water gauge pressure; all leakage should be in-leakage. Should the fan fail to start, the redundant alternate fan and filter system is designed to start automatically. Each of the two fans has 200% capacity. Ref. Section 5.3.2 SAR. If one standby gas treatment system circuit is inoperable, the other circuit will be tested daily. This substantiates the availability of the operable circuit and results in no added risk; thus, reactor operation or refueling operation can continue. If neither circuit is operable, the plant is brought to a condition where the system is not required.

While only a small amount of particulates are released from the pressure suppression chamber system as a result of the loss of coolant

3.7 LIMITING CONDITION FOR OPERATION	4.7 SURVEILLANCE REQUIREMENT
b. Reactor operation may continue provided that no more than one quarter of the number of pressure suppression chamber - drywell vacuum breakers are determined to be inoperable provided that they are secured or known to be in the closed position.	(4) A drywell to suppression chamber leak test shall demonstrate that with initial differential pressure of not less than 1.0 psi, the differential pressure decay rate does not exceed the rate which would occur through a 1-inch orifice without the addition of air or nitrogen.
c. Reactor operation may continue for fifteen (15) days provided that at least one position alarm circuit for each operable vacuum breaker is operable and each suppression chamber - drywell vacuum breaker is physically verified to be closed immediately and daily thereafter.	
5. Combustible Gas Control Prior to installation of the Air Containment Atomospheric Dilution (ACAD) system which is discussed in Dresden Special Report No. 39, control of radiolytic gas will be accomplished using the containment purge system through standby gas treatment.	5. Combustible Gas Control Once a month, the valves in the purge line to the standby gas treatment system shall be actuated to determine operability. The surveillance required by Section 4.7.B demonstrates operability of the standby gas treatment system.
Whenever the reactor is in power operation, the primary containment purge system shall be operable. If this specification cannot be met the reactor must be taken out of power operation.	
6. If the specifications of 3.7.A cannot be met, an orderly shutdown shall be initiated and the reactor shall be in a Cold Shutdown condition within 24 hours.	

3.7 LIMITING CONDITION FOR OPERATION	4.7 SURVEILLANCE REQUIREMENT
	Leak rates measured at 48 psig shall be adjusted to a test pressure of 25 psig according to: $LLRT\ (25)_{adj} = LLRT\ (48)_{meas} \times \frac{Lm\ (25)}{LM\ (48)}$
	h. deleted
	i. The interior surfaces of the dry well shall be visually inspected each operating cycle for evidence of deterioration.