



**Commonwealth Edison**  
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April 18, 1977

Mr. Edson G. Case, Deputy Director  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555



**Subject:** Dresden Station Units 2 and 3  
Proposed Amendment to Appendix A  
Technical Specification for DPR-19 and 25  
Concerning Drywell/Torus Differential  
Pressure Instrumentation  
NRC Docket Nos. 50-237 and 50-249

**References (a):** K. R. Goller to R. L. Bolger letter  
dated February 4, 1977.

**(b):** M. S. Turbak to D. L. Ziemann letter  
dated March 4, 1977.

Dear Mr. Case:

Regulatory

File Cy

Pursuant to 10 CFR 50.59, Commonwealth Edison proposes to amend pages 44 and 49A of the Dresden Units 2 and 3 Technical Specifications.

The proposed change to Table 4.2.1 (page 44) will place item 1.C under Containment Monitoring. This item consists of a "0 to +5 psig indicator" that has no Functional Test, a Calibration frequency of "Once/3 months", and an Instrument Check of "Once/Day". The proposed change to Bases: 3.2 (page 49A) places an additional paragraph on the page describing the function of the instrumentation added to Table 4.2.1.

This Technical Specification change is being made as part of a commitment contained in Reference (b) which was submitted in response to Reference (a). A change has not been requested for the Quad-Cities Technical Specifications because the subject instrumentation is already included.

The drywell/torus differential pressure instrumentation provides an accurate readout in the control room of the drywell/torus  $\Delta p$ . Primary control of the drywell/torus  $\Delta p$  is provided by a nitrogen pump back system. This system has been designed to assure that the required drywell/torus  $\Delta p$  is maintained.

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Failure of this instrumentation has no direct effect on safety since the loss of  $\Delta p$  or the inoperability of the  $\Delta p$  system does not require immediate unit shutdown. The existence of a redundant instrument channel does not improve the reliability of the  $\Delta p$  system because only one operable instrument channel is required to maintain the operability of the  $\Delta p$  system. However, it is recognized that there are currently no Technical Specification surveillance requirements for these instruments. Therefore, this Technical Specification change is being submitted to address surveillance of the currently installed instrument system.

The amendment has received on-site and off-site review and approval. Please direct any additional questions to this office.

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

Very truly yours,



R. L. Bolger  
Assistant Vice President

Attachments

SUBSCRIBED and SWORN to  
before me this 18<sup>th</sup> day  
of April, 1977

Nancy M. Hollingworth  
NOTARY PUBLIC

TABLE 4.2.1 (cont)

<u>Instrument Channel</u>	<u>Instrument Functional Test (2)</u>	<u>Calibration (2)</u>	<u>Instrument Check (2)</u>
<u>ISOLATION CONDENSER ISOLATION</u>			
1. Steam Line High Flow	(1)	Once/3 Months	None
2. Condensate Line High Flow	(1)	Once/3 Months	None
<u>HPCI ISOLATION</u>			
1. Steam Line High Flow	(1)	Once/3 Months	None
2. Steam Line Area High Temperature	Refueling Outage	Refueling Outage	None
3. Low Reactor Pressure	(1)	Once/3 Months	None
<u>REACTOR BUILDING VENTILATION SYSTEM ISOLATION AND STANDBY GAS TREATMENT SYSTEM INITIATION</u>			
1. Ventilation Exhaust Duct Radiation Monitors	(1)	Once/3 Months	Once/Day
2. Refueling Floor Radiation Monitors	(1)	Once/3 Months	Once/Day
<u>STEAM JET-AIR EJECTOR OFF-GAS ISOLATION</u>			
1. Radiation Monitors	(1) (3)	Once/3 Months (4)	Once/Day
<u>CONTAINMENT MONITORING</u>			
1. Pressure			
a. -5 to +5 psig indicator	None	Once/3 Months	Once/Day
b. 0 to 75 psig indicator	None	Once/3 Months	None
c. 0 to + 5 psig indicator	None	Once/3 Months	Once/Day
2. Temperature	None	Refueling Outage	Once/Day

## Notes:

- Initially once per month until exposure hours (M as defined on Figure 4.1.1) is  $2.0 \times 10^5$ ; thereafter, according to Figure 4.1.1 with an interval not less than one month nor more than three months. The compilation of instrument failure rate data may include data obtained from other Boiling Water Reactors for which the same design instrument operates in an environment similar to that of Dresden Unit 3.
- Functional test calibrations and instrument checks are not required when these instruments are not required to be operable or are tripped. Functional tests shall be performed before each startup with a required frequency not to exceed once per week. Calibrations shall be performed during each startup or during controlled shutdowns with a required frequency not to exceed once per week. Instrument checks shall be performed at least once per week. Instrument checks shall be performed at least once per day during those periods when the instruments are required to be operable.

rate at the nearest site boundary to less than the dose rate allowed by 10CFR20. Trip settings of 100 mr/hr for the monitors on the refueling floor are based upon initiating normal ventilation isolation and standby gas treatment system operation so that none of the activity released during the refueling accident leaves the reactor building via the normal ventilation stack but that all the activity is processed by the standby gas treatment system.

Instrumentation is provided to monitor the drywell and torus pressure. The primary function of this pressure indication instrumentation is to provide assurance that drywell to torus differential pressure is maintained within a specified range to mitigate the consequences of a drywell blowdown to the torus.

TABLE 4.2.1 (cont)

<u>Instrument Channel</u>	<u>Instrument Functional Test (%)</u>	<u>Calibration (2)</u>	<u>Instrument Check (2)</u>
<u>ISOLATION CONDENSER ISOLATION</u>			
1. Steam Line High Flow	(1)	Once/3 Months	None
2. Condensate Line High Flow	(1)	Once/3 Months	None
<u>HPCI ISOLATION</u>			
1. Steam Line High Flow	(1)	Once/3 Months	None
2. Steam Line Area High Temperature	Refueling Outage	Refueling Outage	None
3. Low Reactor Pressure	(1)	Once/3 Months	None
<u>REACTOR BUILDING VENTILATION SYSTEM ISOLATION AND STANDBY GAS TREATMENT SYSTEM INITIATION</u>			
1. Ventilation Exhaust Duct Radiation Monitors	(1)	Once/3 Months	Once/Day
2. Refueling Floor Radiation Monitors	(1)	Once/3 Months	Once/Day
<u>STEAM JET-AIR EJECTOR OFF-GAS ISOLATION</u>			
1. Radiation Monitors	(1) (3)	Once/3 Months (4)	Once/Day
<u>CONTAINMENT MONITORING</u>			
1. Pressure			
a. -5 to +5 psig indicator	None	Once/3 Months	Once/Day
b. 0 to 75 psig indicator	None	Once/3 Months	None
c. 0 to + 5 psig indicator	None	Once/3 Months	Once/Day
2. Temperature	None	Refueling Outage	Once/Day

## Notes:

- Initially once per month until exposure hours (M as defined on Figure 4.1.1) is  $2.0 \times 10^5$ ; thereafter, according to Figure-4.1.1 with an interval not less than one month nor more than three months. The compilation of instrument failure rate data may include data obtained from other Boiling Water Reactors for which the same design instrument operates in an environment similar to that of Dresden Unit 3.
- Functional test calibrations and instrument checks are not required when these instruments are not required to be operable or are tripped. Functional tests shall be performed before each startup with a required frequency not to exceed once per week. Calibrations shall be performed during each startup or during controlled shutdowns with a required frequency not to exceed once per week. Instrument checks shall be performed at least once per week. Instrument checks shall be performed at least once per day during those periods when the instruments are required to be operable.

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Instrumentation is provided to monitor the drywell and torus pressure. The primary function of this pressure indication instrumentation is to provide assurance that drywell to torus differential pressure is maintained within a specified range to mitigate the consequences of a drywell blowdown to the torus.