



Commonwealth Edison
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May 24, 1978

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 Facility
Operating License Nos. DPR-19
and DPR-25
NRC Docket Nos. 50-237 and 50-249

Dear Mr. Case:

Pursuant to 10 CFR 50.59, Commonwealth Edison proposes to make amendments to Dresden Units 2 & 3 Technical Specifications concerning rewording the control rod coupling integrity statement. The proposed change to Section 4.3.B.1.b will limit the requirement to verify nuclear response to control rod drives (CRDs) that have previously experienced uncoupling. The change does not reduce the margin of safety since CRD coupling is routinely checked at position 48 and uncoupling due to a loose inner screen can only occur at position 48. Therefore, uncoupling at a position other than 48 is unlikely and the verification of nuclear response for the drives which have experienced uncoupling provides a backup verification that the drive is not stuck or unlatched.

The recently approved Technical Specification change, dated March 11, 1977, to Section 4.3.B.1.b states:

Verify that the control rod is following the drive by observing a response in the nuclear instrumentation each time a rod is moved. When no response is discernible, the response should be verified when the reactor is operating at power levels above 20%.

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Mr. Edson G. Case:

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May 24, 1978

It has been recognized by Dresden Station and the NRC via telecons that the Specification is poorly worded. After discussion with the NRC, Washington and Region III it has been agreed the specification should read:

For control rod drives which have experienced uncoupling verify that the control rod is following the drive by observing a response in the nuclear instrumentation each time a rod is moved. When no response is discernible, the response should be verified when the reactor is operating at power levels above 20%.


This proposed change to Dresden Units 2 & 3 will require amending page 56 to both DPR-19 and DPR-25. Enclosure 1 contains this change.

This Technical Specification change has received on-site and off-site review and approval. Please direct any additional questions on this matter to this office.

Pursuant to 10 CFR 170, Commonwealth Edison has determined that this proposed amendment is a combined Class II and Class I Amendment. As such, Commonwealth Edison has enclosed a fee remittance in the amount of \$1,600.00 for this proposed amendment.

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

Very truly yours,



Cordell Reed
Assistant Vice-President

Enclosure

SUBSCRIBED and SWORN to
before me this 24th day
of May, 1978.

Nancy M. Dawson
Notary Public

Enclosure 1

Dresden Units 2 & 3

Technical Specification Amendment

NRC Docket Nos. 50-237/249

3.3 LIMITING CONDITION FOR OPERATION

B. Control Rods

1. All control rods shall be coupled to their drive mechanisms when the mode switch is in "Startup" or "Run". With a control rod not coupled to its associated drive mechanism, operation may continue provided:
 - a. Below 20% power, the rod shall be declared inoperable, full inserted, and the directional control valves electrically disarmed until recoupling can be attempted at all-rods-in or at power levels above 20 percent power.
 - b. Above 20% power, recoupling is being attempted in accordance with an established procedure or the rod shall be declared inoperable, fully inserted and the directional control valves electrically disarmed.
2. The control rod drive housing support system shall be in place during reactor power operation and when the reactor coolant system is pressurized above atmospheric pressure with fuel in the reactor vessel, unless all control rods are fully inserted and Specification 3.3.A.1 is met.

4.3 SURVEILLANCE REQUIREMENT

B. Control Rods

1. Coupling Integrity
 - a. The coupling integrity of each control rod shall be demonstrated by withdrawing each control rod to the fully withdrawn position and verifying that the rod does not go to the overtravel position;
 - (1) Prior to reactor criticality after completing alteration of the reactor core,
 - (2) Anytime the control rod is withdrawn to the "Full out" position in subsequent operation, and
 - (3) For specifically affected individual control rods following maintenance on or modification to the control rod or rod drive system which could affect the rod drive coupling integrity.
 - b. For CRDs that have experienced uncoupling verify that the control rod is following the drive by observing a response in the nuclear instrumentation each time a rod is moved. When no response is discernible, the response should be verified when the reactor is operating at power levels above 20%.
2. The control rod drive housing support system shall be inspected after re-assembly and the results of the inspection recorded.