

Commonweater Edison One First National Plaza, Chicago, Illinois Address Reply to: Post Office Box 767 Chicago, Illinois 60690

December 11, 1974

Roguicary

Mr. Edson G. Case Acting Director Directorate of Licensing Office of Regulation U.S. Atomic Energy Commission Washington, D.C. 20545 RECEIVED DEC16 1974 US. ATOMIC FILERGY COMMISSION Regulatory Wall Section

Subject: Dresden Station Units 2 and 3 Proposed Amendment to Facility Operating Licenses DPR-19 and DPR-25 AEC Dkts 50-237 and 50-249

Dear Mr. Case:

Att.

Pursuant to 10CFR50 Part 50.59, Commonwealth Edison Company requests amendments to Facility Operating Licenses DPR-19 and DPR-25. The purpose of the amendments is to clarify the Technical Specifications by changing a surveillance interval from one week to every seven days during reactor power operation. The proposed amendment is indicated on the attached revised page 54 of Appendix A, Technical Specifications of DPR-19 and DPR-25.

The proposed amendment has received Onsite and Offsite review and approval and involves no unreviewed safety considerations.

Three (3) signed originals and 37 copies are submitted for your review and approval.

Very truly yours,

Byron Lee, Jr. Vice-President

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# 3.3 LIMITING CONDITION FOR OPERATION

## 3.3 REACTIVITY CONTROL

#### Applicability:

Applies to the operational status of the control rod system.

#### Objective:

To assure the ability of the control rod system to control reactivity.

#### Specification:

- A. Reactivity Limitations
  - 1. Reactivity margin core loading

The core loading shall be limited to that which can be made subcritical in the most reactive condition during the operating cycle with the strongest operable control rod in its full-out position and all other operable rods fully inserted.

- 2. Reactivity margin inoperable control rods
  - a. Control rod drives which cannot be moved with control rod drive pressure shall be considered inoperable.

## 4.3 SURVEILLANCE REQUIREMENT

# 4.3 REACTIVITY CONTROL

# Applicability:

Applies to the surveillance requirements of the control rod system.

## Objective:

To verify the ability of the control rod system to control reactivity.

### Specification:

A. Reactivity Limitations

1. Reactivity margin - core loading

Sufficient control rods shall be withdrawn following a refueling outage when core alterations were performed to demonstrate with a margin of 0.25 percent  $\Delta k$  that the core can be made subcritical at any time in the subsequent fuel cycle with the strongest operable control rod fully withdrawn and all other operable rods fully inserted.

2. Reactivity margin - inoperable control rods

Each partially or fully withdrawn operable control rod shall be exercised one notch at least once every seven days during reactor power generation. In the event power operation is continuing with three or more inoperable control rods, this test shall be performed at least once each day. pacetyped w/Ltr Dated 1.3-11-7

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