

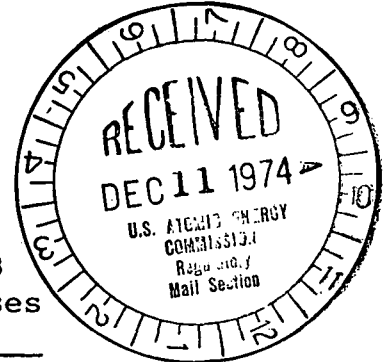


**Commonwealth Edison**  
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AEC PUBLIC DOCUMENT ROOM

December 3, 1974

Mr. Edson G. Case  
 Acting Director  
 Directorate of Licensing  
 Office of Regulation  
 U.S. Atomic Energy Commission  
 Washington, D.C. 20545



Subject: Dresden Station Units 2 and 3  
 High Energy Line Break Analyses  
 AEC Dkts 50-237 and 50-249

Dear Mr. Case:

Pursuant to Part 50.59 of 10CFR50, Commonwealth Edison Company requests an amendment to DPR-19 and DPR-25, Appendix A, Dresden Unit 2 and Dresden Unit 3 Technical Specifications. The purpose of this proposed amendment is to incorporate into the Technical Specifications an interim surveillance program for certain high energy piping outside containment. In response to a letter dated October 8, 1974, suggested high energy piping interim surveillance requirements are indicated on the attached revised pages 156a, b and c of Appendix A of DPR-19 and DPR-25.

The proposed amendment has received Onsite and Offsite review and has been approved as involving no unreviewed safety considerations.

Three (3) signed originals and 57 copies are submitted for your approval.

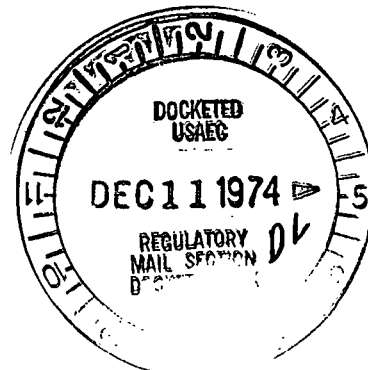
Very truly yours,

*Byron Lee, Jr.*  
 Byron Lee, Jr.  
 Vice-President

Att.

SUBSCRIBED and SWORN to  
 before me this 3rd day  
 of December, 1974.

*Nancy M. Hollingworth*  
 Notary Public



12439

3.11 LIMITING CONDITION FOR OPERATION

4.11 SURVEILLANCE REQUIREMENT

3.11 High Energy Piping Integrity  
(Outside Containment)

Applicability:

Applies to operating status of certain piping outside primary containment.

Objective:

To assure the integrity of sections of piping which is postulated to effect safe plant shutdown.

Specification:

The high energy piping sections identified in Table 4.11-1 shall be maintained free of visually observable through wall leaks.

- A. If a leak is detected by the surveillance program of 4.11, efforts to identify the source of the leaks shall be started immediately.
- B. If the source of leakage can not be identified within 24 hours of detection or if the leak is found to be from a break in the piping sections identified in Table 4.11-1, the pressure within the section of piping shall be brought to atmospheric pressure within 48 hours.

4.11 High Energy Piping Integrity

Applicability:

Applies to the periodic examination requirements for certain piping outside primary containment.

Objective:

To determine the condition of the sections of piping.

Specification:

The inspections listed in Table 4.11-1 shall be performed as specified.

Excerpted w/ Ltr Dated 12-3-74

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TABLE 4.11-1

## Surveillance Requirements for High Energy Piping Outside Containment

<u>Piping</u>	<u>Surveillance Area</u>	<u>Surveillance Technique</u>	<u>Frequency</u>
Main Steam	from primary containment penetration to secondary containment penetration	Visual(1)	30 days
Reactor Feedwater Piping	from primary containment penetration to secondary containment penetration and "A"(2) Reactor Feed Pump discharge to the 24-inch Diameter Feedwater Header	Visual(1) Visual(1)	30 days 30 days
HPCI Steam Piping	from the primary containment pene- tration to the reactor building penetration	Visual(1)	30 days

(1) Visual observation of piping insulation and area for evidence of wetness or any physical damage resulting from a leak. Surveillance to be performed using normal access without scaffolding or any other access aids.

(2) "A" Reactor Feed Pump for Unit 2  
"C" Reactor Feed Pump for Unit 3

Bases:

High Energy Piping Integrity (Outside Containment)

Intensive analysis and review has shown that there are distinct postulated catastrophic high energy piping system failures which have the potential to inhibit safe cold shutdown of the reactor. This conclusion is based on utilizing the basic AEC high energy line pipe break criteria. In the interim period, while the plant is operating, it therefore becomes necessary to apply additional measure to enhance the detection of piping system defects to assure the postulated piping failures are precluded. The inservice examination and the frequency of inspection will provide a means for timely detection of piping defects.

This specification (3.11/4.11) shall only be in effect until completion of modifications which eliminate the consequences of postulated failures which have the potential to inhibit safe cold shutdown of the reactor.