

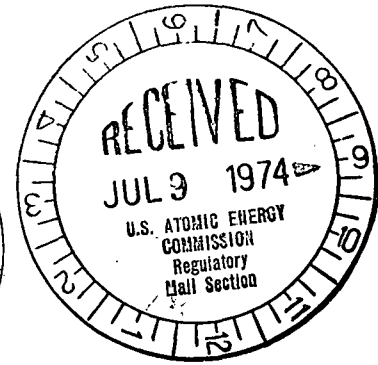
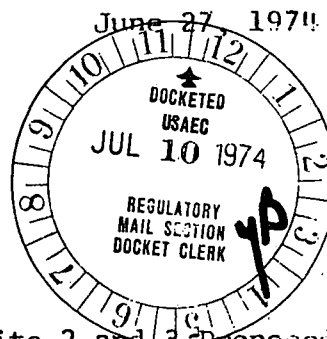


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Regulatory

Edison Co.

Mr. J. F. O'Leary, Director
 Directorate of Licensing
 Office of Regulation
 U. S. Atomic Energy Commission
 Washington, D. C. 20545



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

Dear Mr. O'Leary:

Pursuant to 10 CFR Part 50.59, Commonwealth Edison Company hereby requests a change to Appendix A of DPR-19 and DPR-25. The purpose of this change is the following.

1. Reinstate the standby liquid control system testing requirements as they existed before Technical Specification Change 28/19.
2. Delete the Containment Atmosphere Dilution specification included in Technical Specification Change 28/19. This specification is not appropriate until the Containment Atmosphere Dilution System is installed in 1976.
3. Delete the requirement of Technical Specification Change 28/19 to update reporting automatically as AEC Regulatory Guides are updated.

The proposed changes are indicated on the attached, revised pages 66, 67, 71, 117, 117a, 117b, 126a, 127 and 177.

Safety Evaluation:

1. Standby Liquid

Reinstating the previous specification presents no unreviewed safety considerations since the original specification was evaluated at the time it was made a part of the license. The procedures presently used for surveillance testing of the system are completely adequate to ensure the system will function if required.

2. Containment Atmosphere Dilution

As determined by the AEC Staff and ACRS in the operating license review, the need for additional post LOCA hydrogen control was not of significant safety concern to justify immediate action. We considered these determinations to allow time not only for design

Mr. J. F. O'Leary

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June 27, 1974

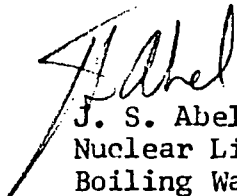
and AEC review of a system for post LOCA hydrogen control, but also time for procurement and installment. The method of post LOCA hydrogen control described in the FSAR (controlled venting) is an adequate means of post LOCA hydrogen control, and no additional requirements are necessary pending installation of the CAD system.

3. The reporting requirements established by the current Regulatory Guides are adequate to protect public health and safety. The requirement in Technical Specification Change 28/19 to update reporting as AEC Regulatory Guides are updated provides no additional safety; therefore the proposed change to delete automatic updating creates no new or unreviewed safety consideration.

These changes have received On-Site and Off-Site review and approval and involve no new or unreviewed safety consideration.

Three signed originals and 37 copies of this proposed change are submitted for your review.

Very truly yours,


J. S. Abel
Nuclear Licensing Administrator
Boiling Water Reactors

SUBSCRIBED and SWORN to
before me this 27th day
of June, 1974.


Notary Public