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April 29, 1974

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



Subject: Dresden Station Units 2 and 3 Proposed Change

to Reactor Operating Licenses DPR-19 and DPR-25

AEC Dkts 50-237 and 50-249

Dear Mr. O'Leary:

Pursuant to Section 50.59 of 10CFR50 and Paragraph 3.B of full term Operating Licenses DPR-19 and DPR-25, Commonwealth Edison Company submits a proposed change to Appendix A of DPR-19 and Appendix A of DPR-25. The purpose of the proposed change is to clarify the surveillance requirements for the maintenance of Filled Discharge Pipe for the High Pressure Coolant Injection (HPCI) System. The bases for this change is Dresden Special Report No. 13 dated April 21, 1971 and Supplement to Special Report No. 13 dated May 13, 1971. This special report discusses the design and analysis of the systems for maintenance of full ECCS pump discharge piping and no requirement for HPCI system discharge pressure switches is specified. The proposed change is indicated on the attached revised pages -- DPR-19, Appendix A - Page 81A, and DPR-25, Appendix A - Page 81A.

A safety evaluation of this change has been made. It has been concluded that no pressure switches are required on the HPCI discharge line because the entire line is below the elevation of the primary source of water. The pressure switch is not required to assure maintenance of a filled discharge pipe to preclude water hammer during system startup; therefore no unreviewed safety consideration is involved in this proposed Tech Spec change.

This proposed Tech Spec change has received Onsite and Offsite review and approval.

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

Very truly yours,

J. S. Abel

Nuclear Licensing Administrator DOCKET CLERK

Boiling Water Reactors

SUBSCRIBED and SWORN to Before me this 19 to day of April , 1974

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