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

October 21, 1975

Director of Nuclear Reactor Regulation
Attn: Mr. Benard C. Rusche, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Subject: Dresden Station Units 2 and 3
Facility Licenses DPR-19 and DPR-25
Proposed Amendment to Technical
Specifications, NRC Dkts. 50-237 and 50-249

Dear Mr. Rusche:

A recent review of the Technical Specifications revealed Change 28 to DPR-19 and Change 19 to DPR-25 changed only the containment isolation function of the main steam line high radiation from seven times normal to three times normal. The reactor protection system sections of the Technical Specifications were unchanged and still read seven times normal. The enclosed pages 23 and 29 of DPR-19 and DPR-25 correct this oversight and make it consistent with present plant settings, the containment isolation sections Table 3.2.1, and the Basis Section 3.2.

Additionally, an obvious typographical error exists on Section 3.5.A.5 line 2, page 75 of DPR-19. "Operable" should obviously be "inoperable".

The above changes have received onsite and offsite review.

Enclosed are three (3) signed originals and 37 copies for your review.

Very truly yours,

Byron Lee, Jr.

Byron Lee, Jr.
Vice-President

SUBSCRIBED and SWORN to
before me this 21st day
of October, 1975.

Nancy M. Hollingsworth
Notary Public

My Commission Expires September 24, 1978

12320

DRESDEN STATION UNIT 2

DPR-19

TECHNICAL SPECIFICATIONS

Revised pages: 23, 29, and 75.

TABLE 3.1.1

REACTOR PROTECTION SYSTEM (SCRAM) INSTRUMENTATION REQUIREMENTS

Minimum Number of Operable Inst. Channels per Trip (1) System	Trip Function	Trip Level Setting	Modes in Which Function Must Be Operable			Action*
			Refuel (7)	Startup/Hot Standby	Run	
1	Mode Switch in Shutdown		X	X	X	A
1	Manual Scram		X	X	X	A
	IRM					
3	High Flux	≤120/125 of Full Scale	X	X	X(5)	A
3	Inoperative		X	X	X(5)	A
	APRM					
2	High Flux	Specification 2.1.A.1	X	X(9)	X	A or B
2	Inoperative		X	X(9)	X	A or B
2	Downscale	≥5/125 of Full Scale	X(12)	X(12)	X(13)	A or B
* 2	High Flux (15% scram)	Specification 2.1.A.2	X	X	X(14)	A
2	High Reactor Pressure	≤1060 psig	X(11)	X	X	A
2	High Drywell Pressure	≤2 psig	X(8), (10)	X(8), (10)	X(10)	A
2	Reactor Low Water Level	≥1 inch***	X	X	X	A
2	High Water Level in Scram Discharge Tank	≤50 gallons	X(2)	X	X	A
2	Turbine Condenser Low Vacuum	≥23 in. Hg Vacuum	X(3)	X(3)	X	A or C
2	Main Streamline High Radiation	≤3 X Normal Full Power Background	X(3)	X(3)	X	A or C
4 (6)	Main Streamline Isolation Valve Closure	≤10% Valve Closure	X(3)	X(3)	X	A or C
2	Generator Load Rejection	****	X(4)	X(4)	X(4)	A or C
2	Turbine Stop Valve Closure	≤10% Valve Closure	X(4)	X(4)	X(4)	A or C
* 2	Turbine Control-Loss of control oil pressure	Greater than or equal to 1100 psig	X	X	X	A or C

The control rod drive scram system is designed so that all of the water which is discharged from the reactor by a scram can be accommodated in the discharge piping. A part of this piping is an instrument volume (u-tube in the piping) which accommodates in excess of 50 gallons of water and is the low point in the piping. No credit was taken for this volume in the design of the discharge piping as concerns the amount of water which must be accommodated during a scram. During normal operation the discharge volume is empty; however, should it fill with water, the water discharged to the piping from the reactor could not be accommodated which would result in slow scram times or partial or no control rod insertion. To preclude this occurrence, level switches have been provided in the instrument volume which alarm and scram the reactor when the volume of water reaches 50 gallons. As indicated above, there is sufficient volume in the piping to accommodate the scram without impairment of the scram times or amount of insertion of the control rods. This function shuts the reactor down while sufficient volume remains to accommodate the discharged water and precludes the situation in which a scram would be required but not be able to perform its function adequately.

Loss of condenser vacuum occurs when the condenser can no longer handle the heat input. Loss of condenser vacuum initiates a closure of the turbine stop valves and turbine bypass valves which eliminates the heat input to the condenser. Closure of the turbine stop and bypass valves causes a pressure transient, neutron flux rise, and an increase in surface heat flux. To prevent the clad safety limit from being exceeded if this occurs, a reactor scram occurs on turbine stop valve closure. The turbine stop valve closure scram function alone is adequate to prevent the clad safety limit from being exceeded in the event of a turbine trip transient with bypass closure. Ref. Section 4.4.3 SAR. The condenser low vacuum scram is a back-up to the stop valve closure scram and causes a scram before the stop valves are closed and thus the resulting transient is less severe. Scram occurs at 23" Hg vacuum, stop valve closure occurs at 20" Hg vacuum and bypass closure at 7" Hg vacuum.

High radiation levels in the main steamline tunnel above that due to the normal nitrogen and oxygen radioactivity is an indication of leaking fuel. A scram is initiated whenever such radiation level exceeds three times normal background. The purpose of this scram is to reduce the source of such radiation to the extent necessary to prevent excessive turbine contamination. Discharge of excessive amounts of radioactivity to the site environs is prevented by the air ejector off-gas monitors which cause an isolation of the main condenser off-gas line provided the limit specified in Specification 3.8 is exceeded.

The main steamline isolation valve closure scram is set to scram when the isolation valves are 10% closed from full open. This scram anticipates the pressure and flux transient, which would occur when the valves close. By scramming at this setting the resultant transient is insignificant. Ref. Section 11.2.3 SAR.

A reactor mode switch is provided which actuates or bypasses the various scram functions appropriate to the particular plant operating status. Ref. Section 7.7.1.2 SAR.

The manual scram function is active in all modes, thus providing for a manual means of rapidly inserting control rods during all modes of reactor operation.

The IRM system provides protection against excessive power levels and short reactor periods in the start-up and intermediate power ranges. Ref.

DPR-19

4. From and after the date that one of the LPCI pumps is made or found to be inoperable for any reason, reactor operation is permissible only during the succeeding 30 days unless such pump is sooner made operable, provided that during such 30 days the remaining active components of the LPCI and containment cooling subsystem and all active components of both core spray subsystems and the diesel generators required for operation of such components if no external source of power were available shall be operable.

5. From and after the date that the LPCI subsystem is made or found to be **inoperable** for any reason, reactor operation is permissible only during the succeeding 7 days unless it is sooner made operable, provided that during such 7 days all active components of both core spray subsystems, the containment cooling subsystems (including 2 LPCI pumps) and the diesel generators required for operation of such components if no external source of power were available shall be operable.

6. Containment cooling spray loops are required to be operable when the reactor water temperature is greater than 212°F except that a maximum of one drywell spray loop may be inoperable for 30 days when the reactor water temperature is greater than 212°F.

7. If the requirements of 3.5.A cannot be met, an orderly shutdown of the reactor shall be initiated and the reactor shall be in Cold Shutdown within 24 hours. Subsequently, the reactor may be placed in Refuel, for post maintenance testing of control rod drives only provided no work is being performed which has the potential to drain the reactor vessel.

4. When it is determined that one of the LPCI pumps is inoperable, the remaining active components of the LPCI and containment cooling subsystem, both core spray subsystems and the diesel generators required for operation of such components if no external source of power were available shall be demonstrated to be operable immediately and the operable LPCI pumps daily thereafter.

5. When it is determined that the LPCI subsystem is inoperable, both core spray subsystems, the containment cooling subsystem, and the diesel generators required for operation of such components if no external source of power were available shall be demonstrated to be operable immediately and daily thereafter.

6. During each five-year period, an air test shall be performed on the drywell spray headers and nozzles.

DRESDEN STATION UNIT 3

DPR-25

TECHNICAL SPECIFICATIONS

Revised pages: 23 and 29.

TABLE 3.1.1

REACTOR PROTECTION SYSTEM (SCRAM) INSTRUMENTATION REQUIREMENTS

Minimum Number of Operable Inst. Channels per Trip (1) System	Trip Function	Trip Level Setting	Modes in Which Function Must Be Operable			Action*
			Refuel (7)	Startup/Hot Standby	Run	
1	Mode Switch in Shutdown		X	X	X	A
1	Manual Scram		X	X	X	A
	IRM					
3	High Flux	≤120/125 of Full Scale	X	X	X(5)	A
3	Inoperative		X	X	X(5)	A
	APRM					
2	High Flux	Specification 2.1.A.1	X	X(9)	X	A or B
2	Inoperative		X	X(9)	X	A or B
2	Downscale	≥5/125 of Full Scale	X(12)	X(12)	X(13)	A or B
2	High Flux (15% scram)	Specification 2.1.A.2	X	X	X(14)	A
2	High Reactor Pressure	≤1060 psig	X(11)	X	X	A
2	High Drywell Pressure	≤2 psig	X(8), (10)	X(8), (10)	X(10)	A
2	Reactor Low Water Level	≥1 inch***	X	X	X	A
2	High Water Level in Scram Discharge Tank	≤50 gallons	X(2)	X	X	A
2	Turbine Condenser Low Vacuum	≥23 in. Hg Vacuum	X(3)	X(3)	X	A or C
2	Main Streamline High Radiation	≤3 X Normal Full Power Background	X(3)	X(3)	X	A or C
4 (6)	Main Streamline Isolation Valve Closure	≤10% Valve Closure	X(3)	X(3)	X	A or C
2	Generator Load Rejection	****	X(4)	X(4)	X(4)	A or C
2	Turbine Stop Valve Closure	≤10% Valve Closure	X(4)	X(4)	X(4)	A or C
2	Turbine Control-Loss of control oil pressure	Greater than or equal to 900 psig	X	X	X	A or C

The control rod drive scram system is designed so that all of the water which is discharged from the reactor by a scram can be accommodated in the discharge piping. A part of this piping is an instrument volume (u-tube in the piping) which accommodates in excess of 50 gallons of water and is the low point in the piping. No credit was taken for this volume in the design of the discharge piping as concerns the amount of water which must be accommodated during a scram. During normal operation the discharge volume is empty; however, should it fill with water, the water discharged to the piping from the reactor could not be accommodated which would result in slow scram times or partial or no control rod insertion. To preclude this occurrence, level switches have been provided in the instrument volume which alarm and scram the reactor when the volume of water reaches 50 gallons. As indicated above, there is sufficient volume in the piping to accommodate the scram without impairment of the scram times or amount of insertion of the control rods. This function shuts the reactor down while sufficient volume remains to accommodate the discharged water and precludes the situation in which a scram would be required but not be able to perform its function adequately.

Loss of condenser vacuum occurs when the condenser can no longer handle the heat input. Loss of condenser vacuum initiates a closure of the turbine stop valves and turbine bypass valves which eliminates the heat input to the condenser. Closure of the turbine stop and bypass valves causes a pressure transient, neutron flux rise, and an increase in surface heat flux. To prevent the clad safety limit from being exceeded if this occurs, a reactor scram occurs on turbine stop valve closure. The turbine stop valve closure scram function alone is adequate to prevent the clad safety limit from being exceeded in the event of a turbine trip transient with bypass closure. Ref. Section 4.4.3 SAR. The condenser low vacuum scram is a back-up to the stop valve closure scram and causes a scram before the stop valves are closed and thus the resulting transient is less severe. Scram occurs at 23" Hg vacuum, stop valve closure occurs at 20" Hg vacuum and bypass closure at 7" Hg vacuum.

High radiation levels in the main steamline tunnel above that due to the normal nitrogen and oxygen radioactivity is an indication of leaking fuel. A scram is initiated whenever such radiation level exceeds **three** times normal background. The purpose of this scram is to reduce the source of such radiation to the extent necessary to prevent excessive turbine contamination. Discharge of excessive amounts of radioactivity to the site environs is prevented by the air ejector off-gas monitors which cause an isolation of the main condenser off-gas line provided the limit specified in Specification 3.8 is exceeded.

The main steamline isolation valve closure scram is set to scram when the isolation valves are 10% closed from full open. This scram anticipates the pressure and flux transient, which would occur when the valves close. By scramming at this setting the resultant transient is insignificant. Ref. Section 11.2.3 SAR.

A reactor mode switch is provided which actuates or bypasses the various scram functions appropriate to the particular plant operating status. Ref. Section 7.7.1.2 SAR.

The manual scram function is active in all modes, thus providing for a manual means of rapidly inserting control rods during all modes of reactor operation.

The IRM system provides protection against excessive power levels and short reactor periods in the start-up and intermediate power ranges. Ref.