



Commonwealth Edison
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September 11, 1978

REGULATORY DOCKET FILE COPY

Director of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Subject: Dresden Station Units 2 and 3
Proposed Amendment to Facility
Operating License Nos. DPR-19 and DPR-25
Regarding Inservice Inspection (ISI)
NRC Docket Nos. 50-237 and 50-249

References (a): M. S. Turbak letter to T. A. Ippolito
dated July 31, 1978

(b): D. L. Ziemann letter to R. L. Bolger
dated November 24, 1976

Dear Mr. Denton:

Pursuant to 10 CFR 50.59, Commonwealth Edison proposes to make amendments to Dresden 2 & 3 Technical Specifications regarding the Inservice Inspection (ISI) Program. Reference (a) transmitted the ISI program to the NRC Staff. That transmittal stated the associated Technical Specifications would be submitted in approximately 30 days. This transmittal fulfills that commitment. These changes modify the Technical Specifications to conform with the inservice inspection and testing programs written in accordance with Section XI of the ASME Boiler and Pressure Vessel Code, 1974 Edition through the 1975 Summer Addenda, as required by 10 CFR 50, Section 50.55a(g), except where specific written relief has been requested of the NRC (Reference (a)) pursuant to 10 CFR 50, Section 50.55a(g)(6)(i). The changes bring the Technical Specifications into conformance with the Section XI requirements so that no conflicts exist between the two documents. In all cases, the Section XI requirements were determined to be sufficient in maintaining an adequate margin of safety. The existing Technical Specifications were also reviewed to identify those surveillance requirements that could potentially place the plant in an unsafe mode of operation should a single failure occur in the process of testing. This resulted in the elimination of certain existing requirements, primarily, the testing of redundant components when the related subsystems are determined to be inoperable. The elimination of this testing has been reviewed with "NRC Staff Guidance for Complying with

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Certain Provisions of 10 CFR 50.55a(g) 'Inservice Inspection Requirements' transmitted by Reference (b) and has been determined to be within the intent of the Staff Guidelines. With the additional testing requirements of Section XI, there is added assurance that the various essential components will have the required operational readiness when required.

Changes to the acceptance requirements for Types B and C local leak rate tests (Page 113, Section 4.7.A.2.f) are also specified in this transmittal. The present Technical Specifications contain acceptance criteria for Types B and C local leak rate tests that specifically state allowable total leakage for individual types of containment penetrations and isolation valves. This acceptance criteria is not in conformance with that specified in Appendix J to 10 CFR 50 which limits total combined leakage from all penetrations and isolation valves to 0.6La. The leakage rate, La, is defined as the Technical Specification maximum allowable leakage rate at the calculated peak containment pressure related to the design basis accident (Pa = 48psig). For Dresden Units 2 and 3, La (defined as Lp in Dresden Tech. Specs.) is 1.6% of the containment volume per day, or 783.5 SCFH. This proposed change would replace the existing acceptance criteria with the criteria specified in Section III.B.3 and III.C.3 of Appendix J to 10 CFR 50.

Some of the reporting requirements listed in Table 6.6.1 "Special Reports" (Page 178) have been eliminated. These reports have previously been submitted and, therefore, the Technical Specification has been fulfilled.

Enclosure 1 contains amended Technical Specification pages for Dresden Unit 2 and Enclosure 2 contains amended pages for Dresden Unit 3. These proposed changes have received on-site and off-site review and approval. Please direct any questions concerning this matter to this office.

Pursuant to 10 CFR 170, Commonwealth Edison has determined that these proposed amendments are two (2) Class III, one (1) Class II, and three (3) Class I Amendments. As such, Commonwealth Edison has enclosed a fee remittance in the amount of \$10,400.00 for the proposed amendments.

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Three (3) signed originals and thirty-seven (37) copies are provided for your use.

Very truly yours,



Cordell Reed
Assistant Vice-President

Enclosure

SUBSCRIBED and SWORN to
before me this 11th, day
of September, 1978.

Ronald M. Lawrence
Notary Public