



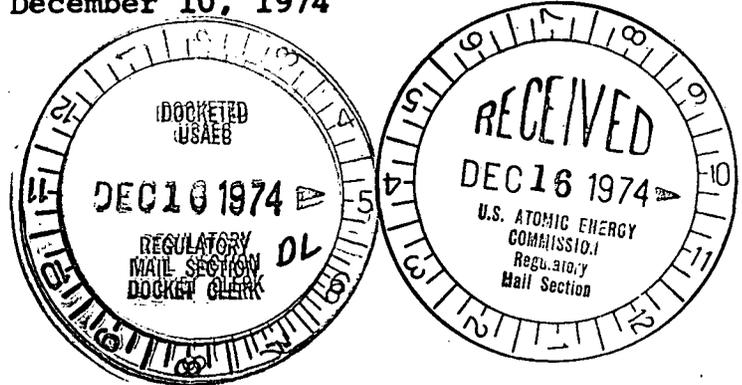
**Commonwealth Edison**  
 One First National Plaza, Chicago, Illinois  
 Address Reply to: Post Office Box 767  
 Chicago, Illinois 60690

Regulatory

File Cy.

December 10, 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  
 Proposed Amendment to Facility  
 Operating Licenses DPR-19 and  
 DPR-25, AEC Dkts 50-237 and 50-249

Dear Mr. Case:

Pursuant to 10CFR50 Part 50.59, Commonwealth Edison Company requests an amendment to facility operating licenses DPR-19 and DPR-25. The purpose of this change is to incorporate Technical Specifications concerning surveillance of snubbers and primary coolant and safeguard system piping. The proposed amendment is indicated on attached revised Technical Specification pages 91a, 91b and 99a.

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

The basis for this decision was the Technical Specification Bases indicated on attached revised page 99a.

One signed original and 59 copies are submitted for your approval.

SUBSCRIBED and SWORN to  
 before me this 12<sup>th</sup> day  
 of December, 1974.

Nancy M. Hollingworth  
 Notary Public

Very truly yours,

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

Att.

### 3.6 LIMITING CONDITION FOR OPERATION

#### H. Recirculation Pump Flow Mismatch

1. Whenever both recirculation pumps are in operation, pump speeds shall be maintained within 10% of each other when power level is greater than 80% and within 15% of each other when power level is less than 80%.
2. If specification 3.6.H.1 cannot be met, one recirculation pump shall be tripped.
3. Whenever one pump is operable and the remaining pump is in the tripped position, the operable pump shall be at a speed less than 65% before starting the inoperable pump.

#### I. Snubbers On Primary Coolant and Safeguard System Piping

1. From and after the date that a snubber is determined to be inoperable, continued reactor operation is permissible only during the succeeding 24 hours unless the snubber is sooner made operable.

### 4.6 SURVEILLANCE REQUIREMENT

3. The baseline data required to evaluate the conditions in Specifications 4.6.G.1 and 4.6.G.2 will be acquired each operating cycle.

#### H. Recirculation Pump Flow Mismatch

Recirculation pumps speed shall be checked daily for mismatch.

#### I. Snubbers On Primary Coolant and Safeguard System Piping

At least every 120 days the following inspections shall be performed on snubbers.

Inspected w/lt Dated 12-10-74

Regulatory

File CY4

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### 3.6 LIMITING CONDITION FOR OPERATION

2. If this condition cannot be met, an orderly shutdown shall be initiated and the reactor shall be in a Cold Shutdown Condition within 24 hours.

### 4.6 SURVEILLANCE REQUIREMENT

1. The fluid level of snubbers shall be determined and recorded. Snubbers showing significant fluid loss shall be repaired and the seals inspected. The mechanical connections of all snubbers shall be inspected.

At least once each refueling outage, the following inspections shall be performed:

1. At least one snubber shall be disassembled and its seals examined to determine if there has been any damage or abnormal degradation.

### 3.6 LIMITING CONDITION FOR OPERATION

### 4.6 SURVEILLANCE REQUIREMENTS

#### H. Jet Pump Flow Mismatch

The LPCI loop selection logic has been described in the Dresden Nuclear Power Station Units 2 and 3 FSAR, Amendments 7 and 8. For some limited low probability accidents with the recirculation loop operating with large speed differences, it is possible for the logic to select the wrong loop for injection. For these limited conditions, the core spray itself is adequate to prevent fuel temperatures from exceeding allowable limits. However, to limit the probability even further, a procedural limitation has been placed on the allowable variation in speed between the recirculation pumps.

The licensee's analyses indicate that above 80% power the loop select logic could not be expected to function at a speed differential of 15%. Below 80% power the loop select logic would not be expected to function at a speed differential of 20%. This specification provides a margin of 5% in pump speed differential before a problem could arise. If the reactor is operating on one pump, the loop select logic trips that pump before making the loop selection.

In addition, during the startup of Dresden Unit 2, it was found that a flow mismatch between the two sets of jet pumps caused by a difference in recirculation loops could set up a vibration until a mismatch in speed of 27% occurred. The 10% and 15% speed mismatch restrictions provide additional margin before a pump vibration problem will occur.

#### I. Snubbers On Primary Coolant and Safeguard System Piping

Snubbers are designed to prevent unrestrained vibration of piping during some postulate dynamic loading condition such as earthquakes. Loss of fluid due to a seal failure could result in a snubber failing to perform its design function and result in exceeding the piping design stress. Therefore, it is required that all snubbers on primary coolant and safeguard system piping be operable for continued plant operation.

The selection of the inspection interval for ethylene-propylene is based on both laboratory testing and in-plant service. The laboratory testing consisted of both long term aging and accident simulation testing. Snubbers with ethylene-propylene seals have been in reactor service for over one year, and surveillance every 120 days has confirmed satisfactory performance. The 120 day surveillance interval will be maintained until further in-plant experience is available to justify longer intervals. The satisfactory testing and one year inservice performance of the snubbers equipped with ethylene-propylene seals justifies the interim surveillance interval.