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November 8, 1974

REGULATORY DOCKET FILE COPY

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, Appendix A, AEC Dkts
 50-237 and 50-249

Dear Mr. Case:

Pursuant to Part 50.59 of 10CFR50, Commonwealth Edison Company requests a proposed amendment to DPR-19, Appendix A and DPR-25, Appendix A. The purpose of this amendment is to delete from the Technical Specifications the requirement to conduct supplementary environmental monitoring whenever airborne radioactive effluents exceed one-third of the limits. The amendment is indicated on the attached revised page 137 for both the Dresden Unit 2 and Dresden Unit 3 Technical Specifications.

Attached is a safety evaluation for the proposed amendment. The proposed amendment and safety evaluation have received Onsite and Offsite review and were approved as involving no unreviewed safety considerations.

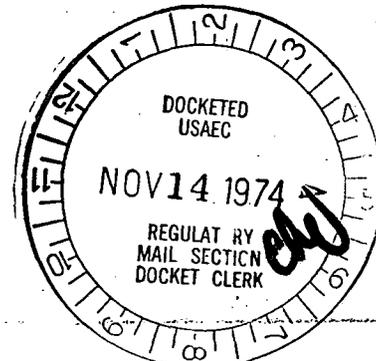
Three (3) signed originals and 57 copies are submitted for your review and approval.

Very truly yours,

Byron Lee Jr
 Byron Lee, Jr.
 Vice-President

SUBSCRIBED and SWORN to
 before me this 8th day
 of November, 1974.

Nancy M. Hollingsworth
 Notary Public



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3.8 LIMITING CONDITION FOR OPERATION

E. General

It is expected that releases of radioactive material in effluents will be kept at small fractions of the limits specified in Section 20.106 of 10CFR Part 20. At the same time the licensee is permitted the flexibility of operation, compatible with considerations of health and safety, to assure that the public is provided a dependable source of power even under unusual operating conditions which may temporarily result in releases higher than such small fractions, but still within the limits specified in Section 20.106 of 10CFR Part 20. It is expected that in using this operational flexibility under unusual operating conditions the licensee will exert his best efforts to keep levels of radioactive material in effluents as low as practicable.

4.8 SURVEILLANCE REQUIREMENT

E. General

Operating procedures shall be developed and used, and equipment which has been installed to maintain control over radioactive materials in gaseous and liquid effluents produced during normal reactor operations, including expected operational occurrences, shall be maintained and used, to keep levels of radioactive material in effluents released to unrestricted areas as low as practicable. The environmental monitoring program given in Table 4.8.1 shall be conducted.

A report shall be submitted to the Commission at the end of each six-months' period of operation specifying total quantities of radioactive material released to unrestricted areas in liquid and gaseous effluents during the previous six months and such other information on releases as may be required to estimate exposures to the public resulting from effluent releases. If quantities of radioactive material released during the reporting period are unusual for normal reactor operations, including expected operational occurrences, the report shall cover this specifically. On the basis of such reports and any additional information the Commission may obtain from the licensee or others, the Commission may from time to time require the licensee to take such action as the Commission deems appropriate.

SAFETY EVALUATION FOR REMOVAL OF SUPPLEMENTARY
ENVIRONMENTAL MEASURING REQUIREMENTS FROM DRESDEN
UNIT 2 AND 3 TECHNICAL SPECIFICATION SECTION 4.8.E

The requirements of Unit 2 and 3 Technical Specification Section 4.8.E pertaining to environmental monitoring have been reviewed by station personnel. This section states "The environmental monitoring program given in Table 4.8.1 shall be conducted. Whenever the airborne effluents exceed 1/3 of the limits in Specification 3.8.A.2, measurements 2,3,5 and 6 of the Table 4.8.1. shall be performed at each farm adjacent to the site and at any cultivated or grazing land on-site." It is our opinion that the routine environmental monitoring program conducted in accordance with Specification 4.8.E adequately satisfy environmental concerns and that the supplemental measurements required by Specification 4.8.E are unnecessary.

The routine radiological environmental monitoring program is an extensive program which was first implemented more than fifteen years ago and involves sample collection and data analysis from more than forty sample locations both on-site and off-site. Parameters monitored in this program include direct radiation, airborne particulate, airborne I-131, milk, grass, cattlefeed, precipitation, soil, vegetables, water, fish, sediment, and other aquatic biota. The extent of this routine monitoring program is illustrated by the fact that during 1973 a total of 3,405 environmental measurements was determined. Additionally, an extensive meteorological program is conducted in parallel with the environmental monitoring program.

The supplemental measurements required by Specification 4.8.E are unnecessary for several reasons. For example, no specific time period for the airborne effluent release is noted. Thus, an instantaneous release requires the same additional monitoring program as would a release that continued for weeks or months. The specification requires supplemental monitoring at each farm adjacent to the site. The peripheral areas of the site are primarily limited to industrial property and rivers. The Specification also requires that supplemental monitoring will be conducted at any cultivated or grazing land on-site. A special environmental study of station effluents was conducted in 1971 when higher than normal releases to the atmosphere were experienced. This study indicates that external gamma radiation exposure from noble gases and trace concentration of I-131 in milk are the most probable dose pathways to unrestricted areas. The limited on-site grazing land is not used by dairy cows but by non-milk producing beef cattle. The limited on-site cultivated land has been used to produce silage crops for these beef cattle during non-grazing periods. Thus an on-site iodine pathway to the thyroid through the grass-cow-receptor chain does not exist. Additionally, the on-site grazing and cultivated land is located west of the station. The supplemental monitoring required by the specification does not allow consideration of wind direction during airborne effluent releases. A review of meteorological data indicates that the predominant winds are from the south west. Thus, the major fraction of airborne effluents would not drift over the limited on-site grazing and cultivated land. Gross gamma background readings are routinely obtained to estimate the external radiation dose from cosmic and natural sources and from artificial radionuclides of station origin. There is no technical basis for requiring special gamma background determinations which utilize standard ionization chambers and TLD measuring techniques for iodine and particulate releases within the limits imposed by the Technical Specifications. These small contributors are overwhelmingly masked by cosmic and terrestrial background contributors. The purpose of sampling and analyzing soil from vegetable farms, cattle feed, and grass from milk collection stations is to monitor possible food chain dose pathways. Since these dose mechanisms do not exist either adjacent to or on the site there is no basis for requiring these additional analyses.

Due to the above mentioned reasons we conclude that Section 4.8.E should be removed from the Unit 2 and Unit 3 Technical Specifications.