



**Commonwealth Edison**

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

November 14, 1979

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

Subject: Dresden Station Unit 1  
Proposed Amendment to Appendix A,  
Technical Specification, to Facility  
Operating License DPR-2 Required  
to Perform Primary System Chemical  
Cleaning  
NRC Docket No. 50-10

Dear Sir:

Pursuant to 10 CFR 50.59, Commonwealth Edison proposes to amend Appendix A, Technical Specifications, to Facility Operating License DPR-2 to support the chemical cleaning of the Dresden Unit 1 primary system.

The changes to the Technical Specifications concern (1) deletion of the requirement to maintain primary containment integrity during the chemical cleaning outage when all fuel is removed from the reactor and containment, and (2) exclusion of radioactive liquid storage tanks which are inside seismically qualified structures from the above grade storage curie limitation.

The change to the primary containment integrity requirement is necessary to allow the chemical cleaning to be performed at the required temperature of 250°F. Special procedures will be implemented to provide for the rapid removal of the cleaning solution to receiving tanks should a significant leak from the primary system occur. This will ensure that any leakage will be small in volume and contained within the sphere. Since the contamination species being removed are non-volatile and no fuel will be inside the containment, release of volatile activities due to a leak would be minimal. Normal ventilation flow is adequate to ensure that any airborne activity will be conveyed to the stack and monitored.

The clarification of the radioactive waste above grade storage requirement is necessary to allow transfer and storage of the spent cleaning solution prior to processing in the Chemical Cleaning Building storage tanks, which are physically above grade. The current curie limit is based upon postulated rupture of above grade tanks, due to a seismic event, allowing their contents to be released in an uncontrolled manner. Since the tanks in the Chemical Cleaning Building are located in a seismically qualified structure sized to contain the contents of all the tanks inside that structure, the curie limit does not apply.

1399 118

7911270339

~~7911270339~~

Director of Nuclear Reactor Regulation  
November 14, 1979  
Page 2

Pursuant to 10 CFR 170, Commonwealth Edison has determined the proposed amendment to be Class III. As such, we have enclosed a fee remittance in the amount of \$4,000.00.

Please address any questions you may have concerning this matter to this office.

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

Very truly yours,

*D. L. Peoples*

D. L. Peoples  
Director of Nuclear Licensing

RFJ:mae  
enclosures

SUBSCRIBED and SWORN to  
before me this 14<sup>th</sup> day  
of November, 1979.

*Mary A. Evans*  
Notary Public

1399 1<sup>18</sup>  
~~121~~