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## 1.0 Definitions

The succeeding frequently used terms are explicitly defined so that a uniform interpretation of the specifications may be achieved.

- A. Immediate - Immediate means that the required action will be initiated as soon as practicable considering the safe operation of the unit and the importance of the required action.
- B. Instrument Calibration - An instrument calibration means the adjustment of an instrument signal output so that it corresponds, within acceptable range, and accuracy, to a known value(s) of the parameter which the instrument monitors. Calibration shall encompass the entire instrument including actuation, alarm, or trip.
- C. Instrument Functional Test - An instrument functional test means the injection of a simulated signal into the instrument primary sensor to verify the proper instrument response, alarm, and/or initiating action. The primary sensors of radiation monitors are excepted from this definition. For these monitors the functional test will consist of injecting a simulated electrical signal into the measurement channel.
- D. Instrument Check - An instrument check is qualitative determination of acceptable operability by observation of instrument behavior during operation. This determination shall include, where possible, comparison of the instrument with other independent instruments measuring the same variable.
- E. Operable - A system, subsystem, train, component, or device shall be operable when it is capable of performing its specified function(s). Implicit in this definition shall be the assumption that all necessary attendant instrumentation, controls, normal and emergency electrical power sources, cooling or seal water, lubrication or other auxiliary equipment that are required for the system, subsystem, train, component or device to perform its function(s) are also capable of performing their related support function(s).
- F. Operating - Operating means that a system, subsystem, train, component or device is performing its intended functions in its required manner.
- G. Surveillance Interval - Each surveillance requirement shall be performed within the specified surveillance interval with:
  - a. A maximum allowable extension not to exceed 25% of the surveillance interval.
  - b. A total maximum combined interval time for any 3 consecutive intervals not to exceed 3.25 times the specified surveillance interval.

- H. Offsite Dose Calculation Manual (ODCM) - Contains the methodology and parameters used in the calculations of offsite doses due to radioactive gaseous and liquid effluents, and in the calculation of gaseous and liquid effluent monitor alarm/trip setpoints.
- I. Process Control Program (PCP) - Contains the sampling, analysis, and formulation determination by which solidification of radioactive wastes from liquid systems is assured.

Dresden I DPR-2  
Amendment No.

1.1 Safety Limits-Fuel Cladding Integrity

Deleted

1.2 Safety Limits-Reactor Coolant System

Deleted

2.1 Limiting Safety System Settings -  
Fuel Cladding Integrity Deleted

Deleted

2.2 Limiting Safety System Settings -  
Reactor Coolant System

Deleted

3.0 LIMITING CONDITION FOR REQUIRED  
EQUIPMENT

3.1 Reactor Protection System

Deleted

3.2 Protective Instrumentation

Deleted

3.3 Reactivity Control

Deleted

3.4 Standby Liquid Control System

Deleted

3.5 Core and Containment Cooling Systems

Deleted

3.6 Primary System Boundary

Deleted

3.7 Containment Systems

Deleted

4.0 SURVEILLANCE REQUIREMENTS

4.1 Reactor Protection System

Deleted

4.2 Protective Instrumentation

Deleted

4.3 Reactivity Control

Deleted

4.4 Standby Liquid Control System

Deleted

4.5 Core and Containment Cooling Systems

Deleted

4.6 Primary System Boundary

Deleted

4.7 Containment Systems

Deleted



3.8 Limiting Condition For Required Equipment

3.8 Radioactive Materials

Applicability:

Applies to the radioactive effluents from the plant.

Objective:

To assure that radioactive effluents are kept as low as practicable, and, in any event, are not released to the environment in an uncontrolled manner and to assure that any material released is within the limits of 10 CFR 20.

Specification:

A. Airborne Effluents

1. Radioactive gases released from the Dresden Unit 1 chimney shall be continuously monitored. To accomplish this, the chimney monitoring system shall be operable at all times except as noted in Specification 3.8.E.
2. Airborne effluents from Unit 1 shall be added to those from Units 2 and 3 and be included in the site dose rate as calculated from prescribed samples and following methods prescribed in the approved Dresden ODCM.

4.8 Surveillance Requirement

4.8 Radioactive Materials

Applicability:

Applies to the periodic monitoring and recording of radioactive effluents.

Objective:

To ascertain that radioactive releases are kept as low as practicable and are within allowable values.

Specification:

A. Airborne Effluents

1. The main chimney monitoring system shall have a daily instrument check, monthly source check, quarterly function test and once per 18 month calibration.
2. Main Chimney activity analysis shall be performed at the specified frequencies.
  - a. Main chimney noble gas (tritium and principal gamma emitters) 1/month
  - b. Main chimney particulate (principal gamma emitters) 1/month\*
  - c. Main chimney iodine 1/month\*
  - d. Main chimney particulate composite (Sr-89, Sr-90, gross alpha) 1/qtr.

Note \* Analysis frequency shall be increased to 1/week if release rates exceed 1% of any applicable limit referenced in Section 3.8.A.2.

3.8 Limiting Condition For Required  
Equipment (Cont'd)

B. Liquid Effluents

1. Radioactive effluents shall not be released from Unit 1 storage tanks directly to the environment (release can be made through D2/3 Radwaste System). Radioactive effluents may be released from Units 2 and 3 by way of the Unit 1 discharge canal only when discharges are controlled on a radionuclide basis in accordance with Appendix B, Table II, Column 2 of 10 CFR 20 and all applicable limits listed in DPR-19 and DPR-25. Additionally, the discharge canal sampler shall be operable at any time a radioactive discharge is occurring via this pathway or the radioactive discharge shall be immediately suspended.
2. The service water discharge shall be continuously monitored and the concentration (above background) in the condenser cooling water discharge canal shall not exceed the limits stated below unless the discharge is controlled on a radionuclide basis in accordance with Appendix B, Table II, Column 2 of 10 CFR 20 and Note 1 thereto:

Maximum Concentration

$1 \times 10^{-7}$   $\mu\text{Ci/ml}$

C. Deleted

4.8 Surveillance Requirement (Cont'd)

B. Liquid Effluents

1. a. The service water radiation monitor shall have an instrument check performed daily, a functional check performed quarterly, and a source check and calibration performed once every 18 months.
- b. The operability of the discharge canal sampler shall be verified prior to performing and once a day during planned discharge.
- c. Station records of batch releases from Units 2 and 3 shall be maintained in accordance with the specifications of DPR-19 and DPR-25.
2. a. Activity analysis of continuous service water discharge shall be performed monthly for I-131, principal gamma emitters dissolved and entrained gases, H-3, and gross alpha activity. Additional analysis for Sr-89, Sr-90 and Fe-55 shall be performed quarterly.
- b. In the event of failure of the service water monitor, effluents may continue to be released via this pathway if a service water grab sample is taken once every 24 hours and analyzed.

C. Deleted

3.8 Limiting Condition For Required Equipment  
(Cont'd)

D. Radioactive Waste Storage

The maximum amount of radioactivity in liquid storage in all Dresden Stations above grade tanks shall not exceed 90 curies. If these conditions cannot be met the stored liquid shall be recycled within 24 hours to below grade tanks. All tanks located within the seismic portion of the Chemical Cleaning Building are not considered above grade storage.

E. Radioactive Effluent Monitoring Availability

1. The entire main chimney monitoring system, including the particulate filters and charcoal cartridges, may be out of service for calibration or maintenance provided that the requirements listed in 4.8.E. are satisfied.

F. Deleted

4.8 Surveillance Requirement (Cont'd)

D. Radioactive Waste Storage

A sample from each of the above-grade liquid waste tanks shall be taken, analyzed, and recorded every 72 hours. If no additions to a tank have been made since the last sample, the tank need not be sampled until the next addition.

E. Radioactive Effluent Monitoring Availability

1. a. The main chimney noble gas monitor may be out-of-service for calibration and maintenance provided that a noble gas grab sample is taken daily and analyzed.
- b. The main chimney particulate and iodine sampling system may be out-of-service for maintenance provided that particulate and iodine samples shall be collected using alternate filter holders and pumps connected to the main chimney sample stream.

F. Deleted

3.8 Limiting Condition For Required  
Equipment (Cont'd)

G. Miscellaneous Radioactive Materials  
Sources

Source Leakage Test

Specification

Each sealed source containing radioactive material in excess of 100 microcuries of beta and/or gamma emitting material or 5 microcuries of alpha emitting material shall be free of  $\geq 0.005$  microcuries of removable contamination.

Each sealed source with removable contamination in excess of the above limit shall be immediately withdrawn from use and either decontaminated and repaired or disposed of in accordance with Commission regulations.

A complete inventory of radioactive materials in the licensee's possession shall be maintained current at all times.

4.8 Surveillance Requirement (Cont'd)

G. Miscellaneous Radioactive Materials  
Sources

Each sealed source shall be tested for leakage and/or contamination by the licensee or by other persons specifically authorized by the Commission or an Agreement State. The test method shall have a detection sensitivity of at least 0.005 microcuries per test sample.

Each category of sealed sources shall be tested at the frequency described below.

1. Sources in use (excluding startup sources previously subjected to core flux) - At least once per six months for all sealed sources containing radioactive material:
  - a. With a half-life greater than 30 days (excluding Hydrogen 3), and
  - b. In any form other than gas.
2. Stored sources not in use - Each sealed source shall be tested prior to use or transfer to another licensee unless tested within the previous six months. Sealed sources transferred without a certificate indicating the last test date shall be tested prior to being placed into use.

A Special Report shall be prepared and submitted to the Commission pursuant to Specification 5.6.C.3 if source leakage tests reveal the presence of  $\geq 0.005$  microcuries of removable contamination.

3.8 Limiting Condition For Required  
Equipment (Cont'd)

H. 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 10 CFR Part 20. The licensee will exert his best efforts to keep levels of radioactive material in effluents as low as is reasonably achievable.

4.8 Surveillance Requirement (Cont'd)

H. General

1. 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 activity shall be maintained and used, to keep levels of radioactive material in effluents released to unrestricted areas as low as is reasonably achievable. The environmental monitoring program given in the ODCM shall be conducted.

BASES

- A. Airborne Effluents - The basis for airborne effluents from the site are contained in the Off-Site Dose Calculation Manual.
- B. Liquid Effluents - Liquid effluent release rate will be controlled in terms of the concentration in the discharge canal. In the case of unidentified mixtures, such concentration limit is based on assumption that the entire content is made up of the most restrictive isotope in accordance with 10 CFR 20. Such a limit assures that even if a person obtained all of his daily water intake from such a source, the resultant dose would not exceed that specified in 10 CFR 20. Since no such use of the discharge canal is made and considerable natural dilution occurs prior to any location where such doses could occur, this assures that off-site doses from this source will be far less than the limits specified in 10 CFR 20.

C. Deleted

- D. Radioactive Liquid Waste Storage - The maximum gross radioactivity in liquid storage in the specified tanks has been limited on the basis of an accidental spill from all stated tanks due to a seismic event great enough to damage them. The Chemical Cleaning Building is seismically designed and designed to contain a simultaneous spill from all the contaminated liquid storage tanks housed within. Assuming a low river flow of 3100 ft<sup>3</sup>/sec, a day period over which the radioactive liquid wastes are diluted in the river, and consumption of the water by individuals at standard man consumption rate (3000 ml/day), the single intake by an individual would not exceed one-third the yearly intake allowable by 10 CFR 20 for unidentified radioisotopes ( $1 \times 10^{-7}$   $\mu$ Ci/ml). The factor of 3 was applied to 10 CFR 20 limits as recommended for situations in which population groups could be exposed.

The sampling frequency has been established so that if the maximum amount of gross radioactivity is exceeded, action can be taken to reduce the radioactivity to a level below the specified limit.

E. Radioactive Effluent Monitoring Availability

F. Deleted

G. Miscellaneous Radioactive Materials Sources

The objective of this specification is to assure that leakage from byproduct, source and special nuclear material sources does not exceed allowable limits. The limitations on removable contamination for sources requiring leak testing, including alpha emitters, is based on 10 CFR 70.39(c) limits for plutonium.

H. Environmental Radiological Monitoring Program - The bases for the environmental monitoring program are contained in the ODCM.

3.9 Limiting Condition For Required Equipment

4.9 Surveillance Requirement

3.9 Auxiliary Electrical Systems

4.9 Auxiliary Electrical Systems

Deleted

Deleted

**BASES**

Deleted

B.3/4.9-2

WP+4144



3.10 Limiting Condition For Required Equipment

Fuel Handling and Storage

Applicability

Applies to fuel handling and fuel storage.

Objective

To prohibit fuel from being loaded into the reactor core and ensure adequate fuel pool water level and quality.

Specification

A. and B. - Deleted

C. Fuel Storage Pool Water Level

Whenever irradiated fuel is stored in the fuel storage pool, the pool water level shall be maintained at a level of at least 18 feet.

D. DELETED

E. Nuclear Fuel shall not be loaded into the reactor core.

F. Fuel Storage Pool Water Quality

Once initial fuel pool cleanup is completed:

1. Cl  $\leq$  0.5 ppm
2. Conductivity  $\leq$  10.0  $\mu$ mho/cm @25°C
3. pH 5.3 to 8.6

If any of the above limits are exceeded, prepare and submit to the commission within 30 days, a Special Report which identifies the cause(s) for exceeding the limit(s) and defines the corrective actions to be taken to ensure that future water quality is in compliance with specification 3.10.F. This is in lieu of a Licensee Event Report.

4.10 Surveillance Requirement

Fuel Handling and Storage

Applicability

Applies to the recording of the fuel pool water level and water quality parameters.

Objective

To verify the fuel pool water level is maintained as specified in 3.10.C and water quality parameters as specified in 3.10.F.

Specification

A. and B. - Deleted

C. Fuel Storage Pool Water Level

Whenever irradiated fuel is stored in the fuel storage pool, the pool water level shall be recorded daily.

D. DELETED

F. Fuel Storage Pool Water

1. Sample and analyze monthly.

BASES

C. Fuel Storage Pool Water Level -

To assure that there is adequate water to shield and cool the irradiated fuel assemblies stored in the pool, a minimum pool water level is established. The minimum water level of 18 feet is established because it would be a significant change from the normal level, well above a level to assure adequate cooling (just above active fuel) and above the level at which the GSEP action is initiated (5' uncontrolled loss of level with level decreasing).

E. Reactor Core

To assure that a critical assembly of nuclear fuel is no longer possible in the reactor core, the placement of nuclear fuel into the reactor core is specifically prohibited.

F. Fuel Storage Pool Water Quality

In December 1983, the Unit 1 fuel pool water cooling and cleanup system was taken out of service because of operational problems. This did not adversely affect the fuel shielding or cooling since the latest discharged fuel had been in the pool over seven years; however, two years of stagnation led to the growth of micro-organisms and the concern for microbial influenced corrosion (MIC) of pool structures. The pool water was treated with hydrogen peroxide in December 1987 to kill the organisms. Following the treatment, the pool bottom was vacuumed to remove the debris. Periodic visual examinations of fuel assemblies have revealed no corrosion effects from either MIC or the long term peroxide treatment. A continuous purification filtration system was installed in March 1989 to control the water purity.

3.11 Limiting Conditions for Operation

High Energy Piping Integrity

Deleted

4.11 Surveillance Requirements

High Energy Piping Integrity

Deleted

5.0 Design Features

5.1 Site

Dresden Unit 1 is located at the Dresden Nuclear Power Station which consists of a tract of land of approximately 953 acres located in the Northwest quarter of the Morris 15-minute quadrangle (as designated by the U.S. Geological Survey), Goose Lake Township, Grundy County, Illinois. The tract is situated in portions of Sections 25, 26, 27, 34, 35, and 36 of Township 34 North, Range 8 East of the Third Principal Meridian.

5.2 - 5.4 - DELETED

5.5 Fuel Storage

The  $K_{eff}$  of the spent fuel storage pool shall be less than or equal to 0.90.

5.6 SEISMIC DESIGN - DELETED

6.0 ADMINISTRATIVE CONTROLS

6.1 Organization, Review, Investigation and Audit

- A. Onsite and off-site organizations shall be established for the unit operation and corporate management, respectively. The onsite and offsite organizations shall include the positions for activities affecting the safety of the nuclear power plant.
1. Lines of authority, responsibility, and communication shall be established and defined for the highest management levels through the intermediate levels to and including all operating organization positions. These relationships shall be documented and updated, as appropriate, in the form of organization charts, functional descriptions of department responsibilities and relationships, and job descriptions for key personnel positions, or in the equivalent forms of documentation. The requirements shall be documented in the Quality Assurance Manual or the Management Plan for Nuclear Operations, Section 3 Organizational Authority, Activity; Section 6 Interdepartmental Relationships.
  2. The Station Manager shall be responsible for overall unit safe operation and shall have control over those onsite activities necessary for safe operation and maintenance of plant.
  3. The Senior Vice President-Nuclear Operations shall have the corporate responsibility for overall plant nuclear safety and shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the plant to ensure nuclear safety.
  4. The individuals who train the operating staff and those who carry out health physics and quality assurance functions may report to the appropriate onsite manager; however, they shall have sufficient organizational freedom to ensure their independence from operational pressures.
- B. DELETED
- C. The shift manning for the station shall be as shown in Table 6.1.1. The Operating Assistant Superintendent, Operating Engineers, Shift Engineers, and Shift Foremen shall have a Senior Operating License. The Fuel Handling Foreman shall have a limited Senior Operating License. The Vice President BWR Operations on the corporate level has responsibility for the Fire Protection Program. An Operating Engineer at the station will be responsible for implementation of the Fire Protection Program.

6.0 ADMINISTRATIVE CONTROLS (Cont'd.)

- D. Qualifications of the station management and operating staff shall meet minimum acceptable levels as described in ANSI N18.1, "Selection and Training of Nuclear Power Plant Personnel," dated March 8, 1971, with the exception of the Health Physics Services Supervisor who shall meet or exceed the qualifications of Radiation Protection Manager of Regulatory Guide 1.8, September 1975, and the Shift Technical Advisor who shall have a bachelor's degree or equivalent in a scientific or engineering discipline with specific training in plant design and response and analysis of the plant for transients and accidents. The individual filling the position of Technical Superintendent shall meet the minimum acceptable level for "Technical Manager" as described in 4.2.4 of ANSI N18.1 - 1971.
- E. Retraining and replacement training of Station personnel shall be in accordance with ANSI N18.1, "Selection and Training of Nuclear Power Plant Personnel," dated March 8, 1971.

A training program for the fire brigade shall be maintained under the direction of the Operating Engineer and shall meet or exceed the requirements of Section 27 of the NFPA Code - 1975, except for fire brigade training sessions which shall be held at least quarterly.

- F. Retraining shall be conducted at intervals not exceeding two years.
- G. The Review and Investigative Function and the Audit Function of activities affecting quality during facility operations shall be constituted and have the responsibilities and authorities outlined below:

1. The Superintendent of the Off-site Review and Investigative Function shall be appointed by the Manager of Quality Assurance/ Nuclear Safety (QA/NS). The Corporate Audit Function shall be the responsibility of the Manager of QA/NS and shall be independent of operations. The Manager of QA/NS reports directly to the Chief Executive Officer and has the responsibility to set Corporate Policy for both the areas of Quality Assurance and Nuclear Safety. Policy is promulgated through a central policy committee directed by the Manager of QA/NS. The Manager of QA/NS has the responsibility for the performance of periodic audits of each nuclear station and corporate department to determine that QA/NS policy is being carried out.

a. Off-site Review and Investigative Function

The Superintendent of the Off-site Review and Investigative Function shall: (i) provide directions for the review

6.0 ADMINISTRATIVE CONTROLS (Cont'd.)

and investigative function and appoint a senior participant to provide appropriate direction, (ii) select each participant for this function, (iii) select a complement of more than one participant who collectively possess background and qualifications in the subject matter under review to provide comprehensive interdisciplinary review coverage under this function, (iv) independently review and approve the findings and recommendations developed by personnel performing the review and investigative function, (v) approve and report in a timely manner all findings of noncompliance with NRC requirements and provide recommendations to the Station Manager, Vice President BWR Operations, Manager of QA/NS, Assistant Vice President (AVP) Quality Programs and Assessment, and the Senior Vice President Nuclear Operations. During periods when the Superintendent of the Off-site Review and Investigative Function is unavailable, he shall designate this responsibility to an established alternate who satisfies the formal training and experience requirements for the Superintendent of the Off-site Review and Investigative Function.

The responsibilities of the personnel performing this function are stated below. The Off-site Review and Investigative Function shall review:

- (1) The safety evaluations for 1) changes to procedures, equipment or systems as described in the safety analysis report and (2) tests or experiments completed under the provision of 10 CFR 50.59 to verify that such actions did not constitute unreviewed safety questions. Proposed changes to the Quality Assurance Program description shall be reviewed and approved by the Manager of QA/NS.
- (2) Proposed changes to procedures, equipment or systems which involve an unreviewed safety question as defined in 10 CFR 50.59.
- (3) Proposed tests or experiments which involve an unreviewed safety question as defined in 10 CFR 50.59.
- (4) Proposed changes in Technical Specifications or NRC operating licenses.

TABLE 6.1.1  
MINIMUM SHIFT MANNING CHART (1)

| UNITS<br>WITH FUEL | CONDITION OF           |                        |                        | NUMBER OF MEN IN EACH POSITION |                   |                |              |            |
|--------------------|------------------------|------------------------|------------------------|--------------------------------|-------------------|----------------|--------------|------------|
|                    | FIRST UNIT             | SECOND UNIT            | THIRD UNIT             | SRO <sup>(2)</sup>             | RO <sup>(3)</sup> | STA or<br>SCRE | NON-<br>LIC. | RAD<br>MEN |
| ONE                | Cold Shutdown          | Cold Shutdown          | Cold Shutdown          | 1                              | 1                 | 0              | 5            | 1          |
|                    | Cold Shutdown          | Cold Shutdown          | Above<br>Cold Shutdown | 2                              | 2                 | 1              | 5            | 1          |
|                    | Cold Shutdown          | Cold Shutdown          | Cold Shutdown          | 1                              | 2                 | 0              | 5            | 1          |
| TWO                | Cold Shutdown          | Cold Shutdown          | Above<br>Cold Shutdown | 2                              | 3                 | 1              | 5            | 1          |
|                    | Cold Shutdown          | Above<br>Cold Shutdown | Above<br>Cold Shutdown | 2                              | 3                 | 1              | 5            | 1          |
|                    | Cold Shutdown          | Cold Shutdown          | Cold Shutdown          | 1                              | 3                 | 0              | 5            | 1          |
| THREE              | Cold Shutdown          | Cold Shutdown          | Above<br>Cold Shutdown | 2                              | 4                 | 1              | 5            | 1          |
|                    | Cold Shutdown          | Above<br>Cold Shutdown | Above<br>Cold Shutdown | 2                              | 4                 | 1              | 5            | 1          |
|                    | Above<br>Cold Shutdown | Above<br>Cold Shutdown | Above<br>Cold Shutdown | 2                              | 4                 | 1              | 5            | 1          |

- SRO - Senior Reactor Operator. At least one SRO must remain in the Control Room at all times when one or more units is above cold shutdown. This person may, however, leave the Control Room for periods not to exceed 10 minutes, provided another SRO acts as relief operator. The SCRE or shift supervisor can fulfill this requirement.
- RO - Reactor Operator (For each reactor containing fuel, one RO will be in the Control Room at all times.)
- STA - Shift Technical Advisor.
- SCRE - Station Control Room Engineer (STA with Senior Reactor Operator's License).
- NON-LIC. - Equipment Operators and Equipment Attendants.
- RAD MEN - Radiation Protection Men.

- NOTES: (1) - Shift crew composition may be less than the minimum requirements for a period of time not to exceed 2 hours in order to accommodate unexpected absence of on-duty shift crew members provided immediate action is taken to restore the shift crew composition to within the minimum requirements.
- (2) - Does not include the licensed Senior Reactor Operator or Senior Reactor Operator limited to fuel handling, supervising CORE OPERATIONS.
- (3) - Shall not operate units on which they are not licensed.

ADDITIONAL REQUIREMENTS

- A. SRO can be RO at controls.
- B. SRO in Control Room cannot provide relief to SRO/RO at controls.
- C. SRO in Control Room must be in sight of or audible range of operator at all times or be in audible range of annunciators.



6.0 ADMINISTRATIVE CONTROLS (Cont'd.)

- (5) Noncompliance with NRC requirements, or of internal procedures or instructions having nuclear safety significance.
- (6) Significant operating abnormalities or deviations from normal and expected performance of plant equipment that affect nuclear safety as referred to it by the On-site Review and Investigative Function.
- (7) Reportable events under 10 CFR 50.73.
- (8) All recognized indications of an unanticipated deficiency in some aspect of design or operation of safety related structures, systems or components.
- (9) Review and report findings and recommendations regarding all changes to the Generating Stations Emergency Plan prior to implementation of such changes.
- (10) Review and report findings and recommendations regarding all items referred by the Technical Staff Supervisor, Station Manager, Vice President BWR Operations and AVP Quality Programs and Assessment.
- (11) Review changes to the Fire Protection Program and implementing procedures.

b. Station Audit Function

The Station Audit Function shall be the responsibility of the AVP Quality Programs and Assessment independent of BWR Operations. Such responsibility is delegated to the Nuclear Quality Programs Manager.

Either of the above, or designated Corporate Staff or Supervisor approved by AVP Quality Programs and Assessment shall approve the audit agenda and checklists, the findings and the report of each audit. Audits shall be performed in accordance with the Company Quality Assurance Program and Procedures. Audits shall be performed to assure that safety-related functions are covered within the period designated below:

- (1) Audit of the Conformance of facility operation to provisions contained within the Technical Specifications and applicable license conditions at least once per year.

6.0 ADMINISTRATIVE CONTROLS (Cont'd.)

- (2) Audit of the adherence to procedures, training and qualification of the station staff at least once per year.
- (3) Audit of the results of actions taken to correct deficiencies occurring in facility equipment, structures, systems or methods of operation that affect nuclear safety at least once per six months.
- (4) Audit of the performance of activities required by the Quality Assurance Program to meet the Criteria of Appendix "B", 10 CFR 50 at least once per 4 months.
- (5) Audit of the Facility Emergency Plan and implementing procedures at least once per 12 months.
- (6) Audit of the Facility Security Plan and implementing procedures at least once per 12 months.
- (7) Audit on-site and off-site reviews at least once per 24 months.
- (8) Audit of Facility Fire Protection Program and implementing procedures at least once per 24 months.
- (9) The radiological environmental monitoring program and the results thereof at least once per 12 months.
- (10) The ODCM and implementing procedures at least once per 24 months.
- (11) The PCP and implementing procedures for solidification of radioactive waste at least once per 24 months.
- (12) Report all findings of noncompliance with NRC requirements and recommendations and results of each audit to the Station Manager, the Manager of QA/NS, the Vice President BWR Operations, AVP Quality Programs and Assessment, the Senior Vice President-Nuclear Operations and the Chief Operating Officer.
- (13) Changes to the Decommissioning Plan.

6.0 ADMINISTRATIVE CONTROLS (Cont'd.)

c. Authority

The Manager of QA/NS reports to the Chief Executive Officer. The Manager of QA/NS has the authority to order unit shutdown or request any other action which he deems necessary to avoid unsafe plant conditions.

The AVP Quality Programs and Assessment reports to the Senior Vice President-Nuclear Operations. The AVP Quality Programs and Assessment has the authority to recommend unit shutdown or request any other action which he deems necessary to avoid unsafe plant conditions. All such disagreements shall be reported immediately to the Manager of QA/NS and the Chief Operating Officer.

d. Records

- (1) Reviews, audits and recommendations shall be documented and distributed as covered in 6.1.G.1.a and 6.1.G.1.b.
- (2) Copies of documentation, reports, and correspondence shall be kept on file at the station.

e. Procedures

Written administrative procedures shall be prepared and maintained for the Off-site Reviews and Investigative Functions described in Specifications 6.1.G.1.a. These procedures shall cover the following:

- (1) Content and method of submission of presentations to the Superintendent of the Off-site Review and Investigative Function.
- (2) Use of committees and consultants.
- (3) Review and approval.
- (4) Detailed listing of items to be reviewed.
- (5) Method of (a) appointing personnel, (b) performing reviews, investigations, (c) reporting findings and recommendations of reviews and investigations, (d) approving reports, and (e) distributing reports.

6.0 ADMINISTRATIVE CONTROLS (Cont'd.)

- (6) Determining satisfactory completion of action required based on improved findings and recommendations reported by personnel performing the review and investigative function.

f. Personnel

- (1) The persons, including consultants, performing the review and investigative function, in addition to the Superintendent of the Off-site Review and Investigative Function, shall have expertise in one or more of the following disciplines as appropriate for the subject or subjects being reviewed and investigated.
  - (a) nuclear power plant technology
  - (b) reactor operations
  - (c) utility operations
  - (d) power plant design
  - (e) reactor engineering
  - (f) radiological safety
  - (g) reactor safety analysis
  - (h) instrumentation and control
  - (i) metallurgy
  - (j) any other appropriate disciplines required by unique characteristics of the facility.
- (2) Individuals performing the Review and Investigative Function shall possess a minimum formal training and experience as listed below for each discipline.
  - (a) Nuclear Power Plant Technology  
Engineering graduate or equivalent with 5 years experience in the nuclear power field design and/or operation.
  - (b) Reactor Operations  
Engineering graduate or equivalent with 5 years experience in the nuclear power plant operations.
  - (c) Utility Operations  
Engineering graduate or equivalent with at least 5 years of experience in utility operation and/or engineering.

6.0 ADMINISTRATIVE CONTROLS (Cont'd.)

(d) Power Plant Design

Engineering graduate or equivalent with at least 5 years of experience in power plant design and/or operation.

(e) Reactor Engineering

Engineering graduate or equivalent. In addition, at least 5 years of experience in nuclear plant engineering, operation, and/or graduate work in nuclear engineering or equivalent in reactor physics is required.

(f) Radiological Safety

Engineering graduate or equivalent with at least 5 years of experience in radiation control and safety.

(g) Safety Analysis

Engineering graduate or equivalent with at least 5 years of experience in nuclear engineering.

(h) Instrumentation and Control

Engineering graduate or equivalent with at least 5 years of experience in instrumentation and control design and/or operation.

(i) Metallurgy

Engineering graduate or equivalent with at least 5 years of experience in the metallurgical field.

- (3) The Superintendent of the Off-site Review and Investigative Function shall have experience and training which satisfy ANSI N18.1 - 1971 requirements for plant managers.

2. The On-site Review and Investigative Function shall be supervised by the Station Manager. The Station Manager can designate this responsibility to an alternate who satisfies the ANSI N18.1 (March 8, 1971) experience requirements for Plant Manager

6.0 ADMINISTRATIVE CONTROLS (Cont'd.)

a. On-site Review and Investigative Function

The Station Manager (or designee) shall: (i) provide direction for the Review and Investigative Function and appoint the Technical Staff Supervisor, or other comparably qualified individual as a senior participant to provide appropriate direction; (ii) approve participants for this function; (iii) assure that a complement of more than one participant who collectively possess background and qualifications in the subject matter under review are selected to provide comprehensive inter-disciplinary review coverage under this function; (iv) independently review and approve the findings and recommendations developed by personnel performing the Review and Investigative Function; (v) report all findings of noncompliance with NRC requirements, and provide recommendations and (vi) submit to the Offsite Review and Investigative Function for concurrence in a timely manner, those items described in Specification 6.1.G.1.a which have been approved by the On-site Review and Investigative Function.

The responsibilities of the personnel performing this function are stated below:

- (1) Review of: 1) procedures required by Specification 6.2 and changes thereto, 2) any other proposed procedures or changes thereto as determined by the Station Manager (or designee) to affect nuclear safety.
- (2) Review of all proposed tests and experiments that affect nuclear safety.
- (3) Review of all proposed changes to the Technical Specifications.
- (4) Review of all proposed changes or modifications to plant systems or equipment that affect nuclear safety.
- (5) Investigation of all noncompliance with NRC requirements and shall prepare and forward a report covering evaluation and recommendations to prevent recurrence.
- (6) Review of facility operations to detect potential safety hazards.

6.0 ADMINISTRATIVE CONTROLS (Cont'd.)

- (7) Performance of special reviews and investigations and reports thereon as requested by the Superintendent of the Off-site Review and Investigative Function.
- (8) Review of the Station Security Plan and shall submit recommended changes to the Director of Corporate Security and the AVP Quality Programs and Assessment in lieu of distribution in accordance with 6.1.G.2.c.(1).
- (9) Review of the Emergency Plan and station implementing procedures and identification of recommended changes.
- (10) Review of reportable events and actions taken to prevent recurrence.
- (11) Review of any unplanned on-site release of radioactive material to the environs including the preparation and forwarding of reports covering evaluation recommendations and disposition of the corrective action to prevent recurrence to the Vice President BWR Operations and to the Superintendent of the Off-site Review and Investigative Function.
- (12) Review of changes to the PCP and ODCM and major changes to the radwaste treatment systems.
- (13) Review changes to the Fire Protection Program and implementing procedures.

b. Authority

The Technical Staff Supervisor is responsible to the Station Manager (or designee) and shall make recommendations in a timely manner in all areas of review, investigation, and quality control phases of plant maintenance, operation and administrative procedures relating to facility operations. The Technical Staff Supervisor shall have the authority to request the action necessary to ensure compliance with rules, regulations, and procedures when in his opinion such action is necessary. The Station Manager (or designee) shall follow such recommendations or select a course of action that is more conservative regarding safe operation of the facility. All such disagreements shall be reported immediately to the Vice President BWR Operations and the Superintendent of the Off-site Review and Investigative Function.

6.0 ADMINISTRATIVE CONTROLS (Cont'd.)

c. Records

- (1) Reports, reviews, investigations, and recommendations prepared and performed for Specification 6.1.G.2.a shall be documented with copies to the Vice President BWR Operations, the Superintendent of the Off-site Review and Investigative Function, and the AVP Quality Programs and Assessment.
- (2) Copies of all records and documentation shall be kept on file at the station.

d. Procedures

Written administrative procedures shall be prepared and maintained for conduct of the On-site Review and Investigative Function. These procedures shall include the following:

- (1) Content and method of submission and presentation to the Station Manager (or designee), Vice president BWR Operations and the Superintendent of the Off-site Review and Investigative Function.
- (2) Use of committees.
- (3) Review and approval,
- (4) Detailed listing of items to be reviewed.
- (5) Procedures for administration of the quality control activities.
- (6) Assignment of responsibilities.

e. Personnel

- (1) The personnel performing the On-site Review and Investigative Function, in addition to the Station Manager (or designee) shall consist of persons having expertise in:
  - (a) nuclear power plant technology
  - (b) reactor operations
  - (c) reactor engineering
  - (d) radiological safety
  - (e) chemistry
  - (f) instrumentation and control
  - (g) mechanical and electric systems.



6.0 ADMINISTRATIVE CONTROLS (Cont'd.)

- (2) Personnel performing the On-site Review and Investigative Function shall meet minimum acceptable levels as described in ANSI N18.1- 1971, Sections 4.2 and 4.4.

H. Fire Protection.

1. An independent fire protection and loss prevention program inspection and audit shall be performed at least once per 12 months utilizing either qualified off-site licensee personnel or an outside fire protection firm.
2. An inspection and audit of the fire protection and loss prevention program shall be performed by a qualified outside fire consultant at least once per 36 months.

6.2 Plant Operating Procedures

- A. Detailed written procedures including applicable checkoff lists covering items listed below shall be prepared, approved, and adhered to:
- \* 1. Systems and components involving nuclear safety of the facility.
  2. Deleted.
  3. Actions to be taken to correct specific and foreseen potential malfunctions of systems or components including responses to alarms.
  4. Emergency conditions involving potential or actual release of radioactivity - "Generating Stations Emergency Plan" and station emergency and abnormal procedures.
  5. Instrumentation operation which could have an effect on the safety of the facility.
  6. Preventive and corrective maintenance operations which could have an effect on the safety of the facility.
  7. Surveillance and testing requirements.

6.0 ADMINISTRATIVE CONTROLS (Cont'd.)

8. Tests and experiments.
  9. Deleted.
  10. Station Security Plan and implementing procedures.
  11. Fire Protection Program implementation.
  12. ODCM implementation.
  13. PCP implementation.
  14. Working hours of the Shift Engineer, Station Control Room Engineer, Shift Foreman, and Nuclear Station Operator job classifications such that the heavy use of overtime is not routinely required.
- B. Radiation control procedures shall be maintained, made available to all station personnel and adhered to. These procedures shall show permissible radiation exposure and shall be consistent with the requirements of 10 CFR 20. This radiation protection program shall be organized to meet the requirements of 10 CFR 20.
- C. 1. Procedures for items identified in Specification 6.2.A and any changes to such procedures shall be reviewed and approved by the Operating Engineer and the Technical Staff Supervisor in the areas of operation, fuel handling, or instrument maintenance, and by the Maintenance Assistant Superintendent and Technical Staff Supervisor in the areas of plant maintenance and plant inspection. Procedures for items identified in Specification 6.2.B and any changes to such procedures shall be reviewed and approved by the Health Physics Services Supervisor. At least one person approving each of the above procedures shall hold a valid senior reactor operator's license. In addition, these procedures and changes thereto must have authorization by the Station Manager (or designee) before being implemented.
2. Work and instruction type procedures which implement approved maintenance or modification procedures shall be approved and authorized by the Maintenance Assistant Superintendent where the written authority has been provided by the Production Superintendent. The "Maintenance/Modification Procedure" utilized for safety related work shall be so approved only if procedures referenced in the "Maintenance/Modification Procedure" have been approved as

6.0 ADMINISTRATIVE CONTROLS (Cont'd.)

required by 6.2.A. Procedures which do not fall within the requirements of 6.2.A or 6.2.B may be approved by the Department Heads.

- D. Temporary changes to procedures 6.2.A and 6.2.B above may be made provided:
1. The intent of the original procedure is not altered.
  2. The change is approved by two members of the plant management staff, at least one of whom holds a Senior Reactor Operator's License for Units 2 and 3.
  3. The change is documented, reviewed by the On-site Review and Investigative Function and approved by the Station Manager (or designee) within 14 days of implementation.
- E. Drills of the emergency procedures described in Specification 6.2.A.4 shall be conducted at the frequency specified in the Generating Station Emergency Plan. These drills will be planned so that during the course of the year, communication links are tested and outside agencies are contacted.

6.3 Action to be Taken in the Event of a Reportable Event in Plant Operation

Any reportable event shall be promptly reported to the Vice President BWR Operations or his designated alternate. The incident shall be promptly reviewed pursuant to Specification 6.1.G.2.a(5) and a separate report for each reportable event shall be prepared in accordance with the requirements of Specification 6.6.B.

6.4 Deleted.

6.5 Plant Operating Records

- A. Records and/or logs relative in the following items shall be kept in a manner convenient for review and shall be retained for at least five years.

6.0 ADMINISTRATIVE CONTROLS (Cont'd.)

1. Deleted.
  2. Records of standby operations and principal maintenance activities, including inspection and repair, regarding principal items of equipment pertaining to nuclear safety.
  3. Records and reports of reportable and safety limit events.
  4. Records and periodic checks, inspection and/or calibrations performed to verify the Surveillance Requirements (See Section 4 of these Specifications) are being met. All equipment failing to meet surveillance requirements and the corrective action taken shall be recorded.
  5. Records of changes made to the equipment or reviews of tests and experiments to comply with 10 CFR 50.59.
  6. Records of radioactive shipments.
  7. Records of tests pertaining to nuclear safety.
  8. Records of changes to operating procedures.
  9. Shift Engineers Logs.
  10. By-product material inventory records and source leak test results.
- B. Records and/or logs relative to the following items shall be recorded in a manner convenient for review and shall be retained for the life of the plant.
1. Substitution or replacement of principal items of equipment pertaining to nuclear safety.
  2. Changes made to the plant as it is described in the Safety Analysis Report.
  3. Records of spent fuel inventory and assembly histories.
  4. (Deleted)
  5. Updated, corrected, and as-built drawings of the plant.
  6. Records of plant radiation and contamination surveys.
  7. Records of off-site environmental monitoring surveys.

6.0 ADMINISTRATIVE CONTROLS (Cont'd.)

8. Records of radiation exposure for all plant personnel, including all contractors and visitors to the plant in accordance with 10 CFR 20.
9. Records of radioactivity in liquid and gaseous wastes released to the environment.
10. Deleted.
11. Records of individual staff members indicating qualifications, experience, training and retraining.
12. Deleted.
13. Minutes of meetings and results of reviews performed by the Off-site and On-site Review Functions.
14. Deleted.

6.6 REPORTING REQUIREMENTS

In addition to the applicable reporting requirements of Title 10, Code of Federal Regulations, the following identified reports shall be submitted to the Regional Administrator of the appropriate Regional Office of the NRC unless otherwise noted.

A. Routine Reports

1. Deleted.
2. A tabulation shall be submitted on an annual basis of the number of station, utility and other personnel (including contractors) receiving exposures greater than 100 mrem/yr and their associated man rem exposure according to work and job functions, (See Note); e.g., reactor operations and surveillance, inservice inspection, routine maintenance, special maintenance (describe maintenance), waste processing, and refueling. The dose assignment to various duty functions may be estimates based on pocket dosimeter, TLD, or film badge measurements. Small exposures totalling less than 20% of the individual total dose need not be accounted for. In the aggregate, at least 80% of the total whole body dose received from external sources shall be assigned to specific major work functions.
3. Deleted.

Note:

This tabulation supplements the requirements of 20.407 of 10 CFR Part 20.

6.0 ADMINISTRATIVE CONTROLS (Cont'd.)

B. Reportable Events

Reportable events will be submitted as required by 10 CFR 50.73.

C. Unique Reporting Requirements

1. Radioactive Effluent Release Report (Semi-Annual)

A report shall be submitted to the Commission within 60 days after January 1 and July 1 of each year specifying the quantity of each of the principal radionuclides released to unrestricted areas in liquid and gaseous effluents during the previous 6 months. The format and content of the report shall be in accordance with Regulatory Guide 1.21 (Revision 1) dated June 1974. Any changes to the PCP shall be included in this report.

2. Environmental Radioactivity Data (Annual Report)

a. Standard Radiological Monitoring Program

(1) Non-Routine Report

- (a) If a confirmed measured radionuclide concentration in an environmental sampling medium averaged over any calendar quarter sampling period exceeds the reporting level given in Table 4.8-1 and if the radioactivity is attributable to plant operation, a written report shall be submitted to the Regional Administrator of the NRC Regional Office, with a copy to the Director, Office of Nuclear Reactor Regulation, within 30 days from the end of the quarter. When more than one of the radionuclides in Table 4.8-1 are detected in the medium, the reporting level shall have been exceeded if

$\sum(C_i/(RL)_i)$  is equal to or greater than 1

where C is the concentration of the  $i^{\text{th}}$  radionuclide in the medium and RL is the reporting level of radionuclide i.

- (b) If radionuclides other than those in Table 4.8-1 are detected and are due to plant effluents, a reporting level is exceeded if the potential annual dose to an individual is equal to or greater than the design objective doses of 10 CFR 50, Appendix I.

6.0 ADMINISTRATIVE CONTROLS (Cont'd.)

- (c) This report shall include an evaluation of any release conditions, environmental factors, or other aspects necessary to explain the anomalous effect.

(2) Annual Operating Report

An annual report containing the data taken in the standard radiological monitoring program (Table 4.8-1) shall be submitted by March 31 of the next year. The content of the report shall include:

- (a) Results of environmental sampling summarized on a quarterly basis following the format of Regulatory Guide 4.8 Table 1 (December 1975); (individual sample results will be retained at the station);

In the event that some results are not available for inclusion with the report, the report shall be submitted noting and explaining the reasons for the missing results. Summaries, interpretations, and analysis of trends of the results are to be provided.

- (b) An assessment of the monitoring results and radiation dose via the principal pathways of exposure resulting from plant emissions of radioactivity including the maximum noble gas gamma and beta air doses in the unrestricted area. The assessment of radiation doses shall be performed in accordance with the ODCM.
- (c) Results of the census to determine the locations of animals producing milk for human consumption, and the pasture season feeding practices at dairies in the monitoring program.
- (d) The reason for the omission if the nearest dairy to the station is not in the monitoring program. (Table 4.8-5)
- (e) An annual summary of meteorological conditions concurrent with the releases of gaseous effluents in the form of joint frequency distributions of wind speed, wind direction, and atmospheric stability.

6.0 ADMINISTRATIVE CONTROLS (Cont'd.)

- (f) The results of the interlaboratory comparison program described in Section 3.8.E.7.
- (g) The results of the 40 CFR 190 uranium fuel cycle dose analysis for each calendar year
- (h) A summary of the monitoring program, including maps showing sampling locations and tables giving distance and direction of sampling locations from the station.

3. Special Reports

Special reports shall be submitted as indicated in Table 6.6.1.

6.7 Deleted.

6.8 Offsite Dose Calculation Manual (ODCM)

- A. The ODCM shall describe the methodology and parameters to be used in the calculation of offsite doses due to radioactive gaseous and liquid effluents and in the calculation of gaseous and liquid effluent monitoring instrumentation alarm/trip setpoints consistent with the applicable LCO's contained in these Technical Specifications. Methodologies and calculational



TABLE 6.6.1

SPECIAL REPORTS

| <u>AREA</u>                            | <u>SPECIFICATION<br/>REFERENCE</u> | <u>SUBMITTAL DATE</u> |
|--|------------------------------------|-----------------------|
| a. Radioactive Source Leak Testing (1) | 3.8.F                              | Annual Report         |

NOTES:

1. The report is required only if the tests reveal the presence of 0.005 microcuries or more of removable contamination.

6.0 ADMINISTRATIVE CONTROLS (Cont'd.)

procedures acceptable to the Commission are contained in NUREG-0133.

The ODCM shall be submitted to the Commission at the time of proposed Radiological Effluent Technical Specifications and shall be subject to review and approval by the Commission prior to implementation.

- B. Licensee initiated changes to the ODCM may be made provided the change:
  - 1. Shall be submitted to the Commission by inclusion in the Monthly Operating Report pursuant to Specification 6.6.A.3. within 90 days of the date the change(s) was made effective and shall contain:
    - a. Sufficiently detailed information to support the change. Information submitted should consist of a package of those pages of the ODCM to be changed together with appropriate analyses or evaluations justifying the change(s);
    - b. A determination that the change will not reduce the accuracy or reliability of dose calculations or setpoint determinations; and
    - c. Documentation of the fact that the change has been reviewed and found acceptable by the On-site Review Function.
  - 2. Shall become effective upon review and acceptance by the On-Site Review Function.

6.9 Process Control Program (PCP)

- A. The PCP shall contain the sampling, analysis, and formulation determination by which solidification of radioactive wastes from liquid systems is assured.
- B. The PCP shall be approved by the Commission prior to implementation.
- C. Licensee initiated changes may be made to the PCP provided the change:
  - 1. Shall be submitted to the Commission in the Radioactive Effluent Release Report for the period in which the change was made and shall contain:

6.0 ADMINISTRATIVE CONTROLS (Cont'd.)

- a. Sufficiently detailed information to support the change;
  - b. A determination that the change did not reduce the overall conformance of the solidified waste product to existing criteria for solid wastes; and
  - c. Documentation that the change has been reviewed and found acceptable by the On-site Review Function.
2. Shall become effective upon review and acceptance by the On-site Review Function.

6.10 Major Changes to Radioactive Waste Treatment Systems (Liquid, Gaseous, Solid) (See note below)

- A. Licensee initiated major changes to the radioactive waste systems may be made provided:
1. The change is reported in the Monthly Operating Report for the period in which the evaluation was reviewed by the On-site Review Function. The discussion of each change shall contain:
    - a. A summary of the evaluation that led to the determination that the change could be made in accordance with 10 CFR 50.59;
    - b. Sufficient detailed information to support the reason for the change;
    - c. A detailed description of the equipment, components, and process involved and the interfaces with other plant systems;
    - d. An evaluation of the change which shows the predicted releases of radioactive materials in liquid and gaseous effluents and/or quantity of solid waste that differ from those previously predicted in the license application and amendments;
    - e. A comparison of the predicted releases of radioactive materials in liquid and gaseous effluents and in solid waste to the actual releases for the period in which the changes were made;
    - f. An estimate of the exposure to plant operating personnel as a result of the change; and

Note: Licensee may choose to submit this information as part of the annual FSAR update.

6.0 ADMINISTRATIVE CONTROLS (Cont'd.)

- g. Documentation of the fact that the change was reviewed and found acceptable by the On-site Review Function.
- 2. The change shall become effective upon review and acceptance by the On-site Review Function.

## ATTACHMENT D

### SIGNIFICANT HAZARDS CONSIDERATION

#### DESCRIPTION OF AMENDMENT REQUEST:

The proposed amendment to the operating license for Dresden Station Unit 1 reflects changes made to the Unit 2/3 Technical specifications in the areas of Fire Protection and Administrative Controls. In addition, the entire Auxiliary electrical systems section is being deleted; while, limits are being added for the spent fuel pool water chemistry.

#### BASIS FOR NO SIGNIFICANT HAZARDS CONSIDERATION:

Commonwealth Edison has performed an evaluation of the hazards consideration associated with the proposed Technical Specifications utilizing the criteria in 10 CFR 50.92. Our evaluation is provided below and specifically addresses the three criteria of 10 CFR 50.92(c) for the proposed Technical Specification.

The proposed license extension does not involve a significant increase in the probability or consequence of an accident previously evaluated. The proposed license extension would allow for possession and maintenance, but not operation of Unit 1. The Final Hazard's Summary Report, FHSR, addressed numerous design basis accidents. All these accidents originated from an operating reactor. The license specifically prohibits operation of the reactor. Therefore, accidents such as loss-of-coolant, overpressurization, failure to scram, loss of reactor recirculation pumps, etc. are no longer of concern. The FHSR also briefly addressed off-site doses from gaseous and liquid effluents. The non-operating status of the unit has reduced the production of such radioactive materials. Reduced production results in reduced probability of release of such material to the environment. The retained and amended portions of the Technical Specifications ensure radioactive effluents are monitored and controlled such that 10 CFR 20 limitations and Offsite Dose Calculation Manual (ODCM) limitations are not exceeded. Fire Protection requirements will be maintained in the Dresden Administrative Technical Requirements (DATR). The Auxiliary Electrical systems are no longer required for the safe shutdown of the plant. Thus, this amendment will not result in a significant increase in the probability or consequence of an accident previously evaluated.

The proposed license extension does not create the possibility of a new or different kind of accident from any accident previously evaluated. The license specifically prohibits operation of the Unit 1 reactor. Possessing and maintaining a reactor in a de-fueled condition will not create the possibility

of a new or different kind of accident since this condition was achieved during each refueling outage experienced by Unit 1 while Unit 1 had an operating license. The transfer of the Fire Protection requirements from the Technical Specifications to the DATRs will not create a new or different kind of accident since the requirements remain in tact for all areas of the plant containing equipment required for safe shutdown of Units 2/3.

The proposed extension does not involve a significant reduction in the margin of safety because the Technical Specifications contain adequate controls for prohibiting reactor operation, for maintaining spent fuel pool water level and for monitoring and restricting radioactive effluents from Unit 1. Administrative controls have been updated to provide reviews and approvals of procedures, operation, tests, experiments, etc. commensurate with the status of the facility.

For the reasons stated above, Commonwealth Edison finds that the proposed amendments do not involve a significant hazards consideration based on the criteria of 10 CFR 50.92(c). We therefore request approval of the proposed Technical change under the provisions of 10 CFR 50.91(a)(4).