



Commonwealth Edison
1400 Opus Place
Downers Grove, Illinois 60515

April 24, 1992

Dr. Thomas E. Murley, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Attn: Document Control Desk

Subject: Dresden Nuclear Power Station Unit 2
License Change for Reporting Requirements as
Specified within Section 2.G. of License DPR-19
NRC Docket No. 50-237

Reference: Teleconference between CECo (P. Piet) and
US NRC (B. Siegel) dated February 26, 1992

Pursuant to 10 CFR 50.90, Commonwealth Edison (CECo) proposes to amend Facility Operating License DPR-19. The proposed licensed change clarifies the reporting requirements of Section 2.G of Operating License DPR-19. As currently written, Section 2.G specifies NRC notification for violations to any requirements specified in Section 2.C of the License. However, Section 2.C(2) to License DPR-19 includes requirements for Appendix A, Technical Specifications for Dresden Station. Section 2.C does not clearly define Dresden's responsibility for reporting to the NRC violations from the requirements of Appendix A, Technical Specifications beyond the specific reporting requirements already delineated within Dresden's Technical Specifications. As discussed with members of your staff during the referenced teleconference, it is not the intent of Section 2.G of License DPR-19 to require additional reporting requirements outside of those already specified within the Technical Specifications. Therefore, Commonwealth Edison proposes changing Section 2.G of License DPR-19 to clarify Dresden's reporting requirements.

Dresden's proposed change to License DPR-19 reflects current industry standards already in place and accepted by the Commission at other sites. The proposed license change is specified as follows:

- 2.G The licensee shall report any violations of the requirements contained in Section 2, Items C(1), C(3), and C(4) of this license in the following manner: initial notification shall be made within 24 hours to the NRC Operations Center via the Emergency Notification System with written follow-up within 30 days in accordance with the procedures described in 10 CFR 50.73(b),(c), and (e).

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The proposed changes are purely administrative in nature and have no impact on plant operation or the safety analysis for Dresden Station. The changes proposed to License DPR-19 do not: 1) involve a significant increase in the probability or consequences of an accident previously evaluated; or 2) create the possibility of a new or different kind of accident from any accident previously evaluated; or 3) involve a significant reduction in a margin of safety. In addition, the proposed License change meets the criteria for categorical exclusion from environmental review per the requirements of 10 CFR 51.22 (c)(9).

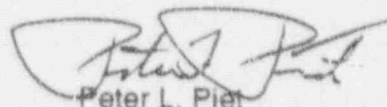
The proposed license change has been reviewed and approved by CECO On-Site and Off-Site Review in accordance with Commonwealth Edison procedures.

To the best of my knowledge and belief, the information contained within is true and correct. In some respect these statements are not based on my personal knowledge, but obtained information furnished by other Commonwealth Edison employees, contractor employees, and consultants. Such information has been reviewed in accordance with company practice, and I believe it to be reliable.

Commonwealth Edison is notifying the State of Illinois of this License change by transmitting a copy of this letter and its attachments to the designated state official.

Please direct any questions you may have concerning this submittal to this office.

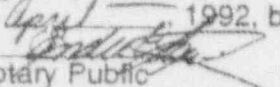
Sincerely,



Peter L. Piet
Nuclear Licensing Administrator

Attachment: Marked-up License Page

- cc: A.B. Davis - Regional Administrator, RIII
- W.G. Rogers - Senior Resident Inspector - Dresden
- B.L. Siegel - NRR, Project Manager
- Office of Nuclear Facility Safety - IDNS

Signed before me on this 24th day,
of April, 1992, by

Notary Public

