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RS-01-094

April 30, 2001

U. S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, DC 20555-0001

Dresden Nuclear Power Station, Units 2 and 3  
Facility Operating License Nos. DPR-19 and DPR-25  
NRC Docket Nos. 50-237 and 50-249

Subject: Implementation of Improved Technical Specifications for Dresden Nuclear Power Station, Units 2 and 3

- References:
- 1) Letter from R. M. Krich (Commonwealth Edison Company) to U.S. NRC, "Request for Technical Specifications Changes for Dresden Nuclear Power Station, Units 2 and 3, LaSalle County Station, Units 1 and 2, and Quad Cities Nuclear Power Station, Units 1 and 2, to Implement Improved Standard Technical Specifications," dated March 3, 2000.
  - 2) Letter from S. N. Bailey (U. S. NRC) to O. D. Kingsley (Exelon Generation Company, LLC), "Issuance of Amendments," dated March 30, 2001

In Reference 1, Commonwealth Edison (ComEd) Company, now Exelon Generation Company (EGC), LLC, proposed changes to Appendix A, Technical Specifications (TS) of Facility Operating License Nos. DPR-19, DPR-25, NPF-11, NPF-18, DPR-29 and DPR-30 for Dresden Nuclear Power Station (DNPS), Units 2 and 3, LaSalle County Station, Units 1 and 2, and Quad Cities Nuclear Power Station (QCNPS), Units 1 and 2, respectively. The proposed changes revised the current Technical Specifications (CTS) to a format and content consistent with NUREG-1433, Revision 1, "Standard Technical Specifications for General Electric Plants, BWR 4," and NUREG-1434, Revision 1, "Standard Technical Specifications for General Electric Plants, BWR 6," as applicable. The NRC approved this requested conversion to the Improved Technical Specifications (ITS) for DNPS in Reference 2.

Reference 2 requested that EGC submit a letter informing the NRC within 14 days of implementing the ITS at DNPS. The purpose of this letter is to inform you that the ITS were implemented at DNPS on April 23, 2001.

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In addition, the attachment to this letter provides EGC comments on the NRC's Safety Evaluation that was issued with the approval of the conversion to the ITS in Reference 2. In a conversation between Mr. L.W. Rossbach of the NRC and Mr. A.R. Haeger, the NRC requested that EGC provide these comments.

Should you have any questions concerning this information, please contact Mr. P.R. Simpson at (630) 663-6698.

Respectfully,

A handwritten signature in black ink, appearing to read "R.M. Krich". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

R.M. Krich  
Director – Licensing  
Mid-West Regional Operating Group

Attachment: Comments on Safety Evaluation for Improved Technical Specifications

cc: Regional Administrator - NRC Region III  
NRC Senior Resident Inspector - Dresden Nuclear Power Station

**Attachment**  
**Implementation of Improved Technical Specifications**  
**for Dresden Nuclear Power Station, Units 2 and 3**

**Comments on Safety Evaluation for Improved Technical Specifications**

<b>Safety Evaluation Page</b>	<b>Technical Specification (TS) Section Title</b>	<b>Comment</b>
32	TS 3.6.4.1, Secondary Containment	The second item in the bulleted list should be changed to read, "SR 3.6.4.1.1, which is performed once every 24 hours, verifies that the secondary containment vacuum is being maintained at $\geq 0.25$ inch water gauge." The current version states the limit as $\geq 0.1$ inch water gauge.
34	TS 3.7.4, Control Room Emergency Ventilation (CREV) System	The description of SR 3.7.4.3 should read, "Verify the CREV System actuates on a manual initiation signal." The second item in the bulleted list should read, "The manual initiation signal is equivalent to a logic system functional test." The current version of these statements uses the phrase, "actual or simulated initiation signal."
39	TS 3.8.4, DC Sources – Operating	The sentence that states, "The staff's evaluation for SRs 3.8.4.3 through and including 3.8.4.7 have been grouped together," should be changed to read, "The staff's evaluation for SRs 3.8.4.4 through and including 3.8.4.8 have been grouped together."