



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

February 8, 1979

Mr. D. L. Ziemann, Chief
Operating Reactors - Branch 2
Division of Operating Reactors
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Subject: Conversion of Dresden Units 1 and 2
Technical Specifications to Standard
Technical Specifications

Dear Mr. Ziemann:

As we discussed in our telephone conversation in late December, Commonwealth Edison has reviewed the possibility of converting the Technical Specifications for Dresden Units 1 and 2 (and ultimately Dresden 3 and Quad-Cities 1/2) to the Standard Technical Specifications (STS).

We have concluded that conversion to the STS, involving a great amount of work for Commonwealth Edison, will not improve safety but may indeed lead to a perception of reduced safety through increased deviations and nonconformances.

Existing technical specifications with associated plant procedures have evolved over the years and are now well understood by operating personnel. Legal interpretations have been established and the precedents integrated into the operating routines. To make the changes to the STS would be a major administrative burden and would require a major manpower commitment from the stations and general office groups. It would require training programs to be revised, personnel requalified, on-site and off-site review of the many new procedures, engineering assistance and significant licensing effort.

Our review of the differences between the STS and our current technical specifications discovered few, if any, which could be considered to be of any safety significance. All of the effort in making the conversions would be directed toward complying with paper changes and in no way toward better operation of the units or improved safety.

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Prior to the changes being implemented, there would be an interim period of operation on one set of procedures and technical specifications while learning and preparing for the replacement set. With the transition, it is inevitable that the initial period would result in nonconformances and deviations. Our perceived performance would then be worse and our actual safety might be decreased due to lack of experience with the new specifications and procedures.

The problems of conversion are greatest, and the benefits the least, for Dresden Unit 1 which is least like a "standard" plant of all of our units. A previous attempt of our own to write a "standard" technical specification for Unit 1 led only to confusion and was discontinued.

Based on the above, we believe that a conversion to the STS would be a significant time and manpower burden with no compensating increase in safety or efficiency and we do not intend to pursue the conversion at this time.

Very truly yours,



Cordell Reed
Assistant Vice-President

cc: J. S. Graves