



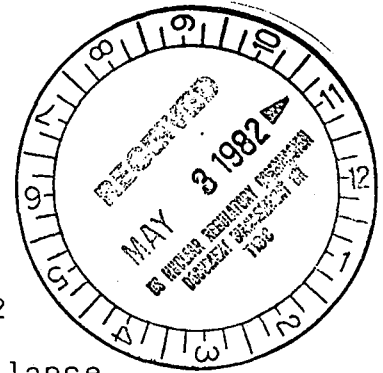
**Commonwealth Edison**

One First National Plaza, Chicago, Illinois

Address Reply to: Post Office Box 767  
Chicago, Illinois 60690

April 29, 1982

Mr. Harold R. Denton, Director  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555



Subject: Dresden Station Units 2 and 3  
Quad Cities Station Units 1 and 2  
Proposed Amendment to Technical  
Specifications Concerning Surveillance  
of Automatic Pressure Relief Valves  
When HPCI Subsystem is Inoperable  
NRC Docket Nos. 50-237/249 & 50-254/265

- References (a): D. M. Crutchfield letter to L. DelGeorge  
dated September 16, 1981 (Am. 65 to  
Dresden 2 DPR-19)
- (b): T. A. Ippolito letter to L. DelGeorge  
dated December 21, 1981 (Am. 57 to  
Dresden 3 DPR-25)

Dear Mr. Denton:

Pursuant to 10 CFR 50.59, Commonwealth Edison hereby requests to amend the Dresden Units 2 and 3 and Quad Cities Units 1 and 2 Operating License Nos. DPR-19, 25, 29 and 30, respectively. The change requested is to delete the Technical Specification surveillance requirement to test the automatic pressure relief valves daily when the HPCI subsystem is inoperable.

Dresden and Quad Cities Technical Specifications 4.5.C.2 currently requires that certain ECCS systems, including the automatic pressure relief subsystem (ADS) be demonstrated operable immediately and daily thereafter when it is determined that HPCI is inoperable. The change requested is to delete only the daily requirement to operate each ADS valve for the remaining six days in which the unit may operate with HPCI inoperable. The feedwater system will be required to be available (as it would normally) as a high pressure and high volume coolant supply.

The attached changes have received On-Site and Off-Site review and approval, with the conclusion that this change will result in increased margins of safety. Since each valve is demonstrated operable immediately, subsequent daily valve cycling will provide little added assurance that the valves will open on demand. The primary effect of subsequent daily testing will be to increase the likelihood that one of the valves will stick open, thereby subjecting the unit to an undesirable pressure reduction transient. It should also be noted that current BWR Standard Technical Specifications do not require the daily opening and closing of ADS valves in comparable situations.

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Temporary approval of this change has been granted previously in license Amendment No. 65 to Dresden Unit 2 and No. 57 to Dresden Unit 3 (References (a) and (b)).

The attached Quad Cities Units 1 and 2 pages also include a change to Technical Specification 3.5.D.1 requiring auto-initiation of relief valves every six months. This requirement is an administrative error which has been discussed with Region III personnel and the appropriate NRR personnel. The surveillance should be performed only during refueling outages.

In accordance with 10 CFR 170, we have determined that the proposed changes are two (2) Class III and two Class I amendments. As such, a fee remittance of \$8,800 is enclosed.

Please direct 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,



Thomas J. Rausch  
Nuclear Licensing Administrator

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cc: Region III Inspector - Dresden  
Region III Inspector - Quad Cities

SUBSCRIBED and SWORN to  
before me this 29th day  
of April, 1982

  
Notary Public

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