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RS-17-174

10 CFR 50.90

December 21, 2017

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

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

Subject: Additional Supplement to Dresden Nuclear Power Station, Units 2 and 3 Application to Revise Technical Specifications to Adopt TSTF-542, "Reactor Pressure Vessel Water Inventory Control"

References:
(1) Letter from P. R. Simpson (Exelon Generation Company, LLC (EGC)) to NRC, "Application to Revise Technical Specifications to Adopt TSTF-542, 'Reactor Pressure Vessel Water Inventory Control,'" dated February 10, 2017

(3) Letter from P. R. Simpson (EGC) to NRC, "Supplement to Dresden Nuclear Power Station, Units 2 and 3 Application to Revise Technical Specifications to Adopt TSTF-542, 'Reactor Pressure Vessel Water Inventory Control,'" dated December 20, 2017

In Reference 1, Exelon Generation Company, LLC (EGC) submitted a request for amendments to the Technical Specifications (TS) for Dresden Nuclear Power Station (DNPS), Units 2 and 3. Specifically, EGC requested that the NRC complete its review and approval of a request to adopt TSTF-542.

In Reference 2, EGC provide supplemental information related to its Reference 1 request. Upon further consideration of one of the TS markup pages and the corresponding revised TS page provided in Reference 2, Attachments 1 and 2 (i.e., TS Pages 3.3.5.2-3), EGC has determined that these pages should be revised. Specifically, TS Table 3.3.5.2-1, Footnote (a) should be associated with the Required Channels Per Function Column for Function 1.a, "Core Spray System Reactor Steam Dome Pressure-Low (Permissive)," Function 1.b, "Core Spray Pump Discharge Flow-Low (Bypass)," Function 2.a, "Low Pressure Coolant Injection System Reactor Steam Dome Pressure-Low (Permissive)," and Function 2.b, "Low Pressure Coolant Injection Pump Discharge Flow-Low (Bypass)," but not the Applicable Modes or Other Specified Conditions column. A proposed TS markup page and revised TS page reflecting this change are provided in Attachments 1 and 2, respectively.

EGC has reviewed the information supporting a finding of no significant hazards consideration, and the environmental consideration, that were previously provided to the NRC in Reference 1. The additional information provided in this submittal does not affect the bases for concluding that the proposed license amendment does not involve a significant hazards consideration. In addition, the information provided in this submittal does not affect the bases for concluding that neither an environmental impact statement nor an environmental assessment needs to be prepared in connection with the proposed amendment.

EGC is notifying the State of Illinois of this supplement to a previous application for a change to the TS by sending a copy of this letter and its attachment to the designated State Official in accordance with 10 CFR 50.91, "Notice for public comment; State consultation," paragraph (b).

There are no regulatory commitments contained within this letter. Should you have any questions concerning this letter, please contact Mr. Mitchel A. Mathews at (630) 657-2819.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 21st day of December 2017.

Respectfully,

Patrick R. Simpson
Manager – Licensing
Exelon Generation Company, LLC

Attachments:
1. Proposed Technical Specifications Changes (Mark-Up)
2. Revised Technical Specifications Pages

cc: NRC Regional Administrator, Region III
NRC Senior Resident Inspector – Dresden Nuclear Power Station
Illinois Emergency Management Agency – Division of Nuclear Safety

Dresden Nuclear Power Station, Units 2 and 3

Additional Supplement to Dresden Nuclear Power Station, Units 2 and 3 Application to Revise Technical Specifications to Adopt TSTF-542, "Reactor Pressure Vessel Water Inventory Control"

ATTACHMENT 1 - PROPOSED TECHNICAL SPECIFICATIONS CHANGES (MARK-UP)

3.3.5.2-3

Table 3.3.5.2-1 (Page 1 of 1)
RPV Water Inventory Control Instrumentation

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS PER FUNCTION	CONDITIONS REFERENCED FROM REQUIRED ACTION A.1	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE
1. Core Spray System					
a. Reactor Steam Dome Pressure–Low (Permissive)	4, 5	2 (a)	C	SR 3.3.5.2.2	≤ 341.7 psig
b. Core Spray Pump Discharge Flow–Low (Bypass)	4, 5	1 per pump (a)	D	SR 3.3.5.2.2	≥ 802 gpm and ≤ 992 gpm
2. Low Pressure Coolant Injection (LPCI) System					
a. Reactor Steam Dome Pressure–Low (Permissive)	4, 5	2 (a)	C	SR 3.3.5.2.2	≤ 341.7 psig
b. Low Pressure Coolant Injection Pump Discharge Flow–Low (Bypass)	4, 5	1 per loop (a)	D	SR 3.3.5.2.2	≥ 1107 gpm
3. Shutdown Cooling System (SDC) Isolation					
a. Reactor Vessel Water Level–Low	(b)	1 per trip system	B	SR 3.3.5.2.1 SR 3.3.5.2.2	≥ 2.65 inches
4. Reactor Water Cleanup System Isolation					
a. Reactor Vessel Water Level–Low	(b)	1 per trip system	B	SR 3.3.5.2.1 SR 3.3.5.2.2	≥ 2.65 inches

(a) Associated with an ECCS subsystem required to be OPERABLE by LCO 3.5.2, "RPV Water Inventory Control."

(b) When automatic isolation of the associated penetration flow path(s) is credited in calculating DRAIN TIME.

Dresden Nuclear Power Station, Units 2 and 3

Additional Supplement to Dresden Nuclear Power Station, Units 2 and 3 Application to Revise Technical Specifications to Adopt TSTF-542, "Reactor Pressure Vessel Water Inventory Control"

ATTACHMENT 2 - REVISED TECHNICAL SPECIFICATIONS PAGES

3.3.5.2-3
3.5.2-3

Table 3.3.5.2-1 (Page 1 of 1)
RPV Water Inventory Control Instrumentation

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS PER FUNCTION	CONDITIONS REFERENCED FROM REQUIRED ACTION A.1	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE
1. Core Spray System					
a. Reactor Steam Dome Pressure–Low (Permissive)	4, 5	2 (a)	C	SR 3.3.5.2.2	≤ 341.7 psig
b. Core Spray Pump Discharge Flow–Low (Bypass)	4, 5	1 per pump (a)	D	SR 3.3.5.2.2	≥ 802 gpm and ≤ 992 gpm
2. Low Pressure Coolant Injection (LPCI) System					
a. Reactor Steam Dome Pressure–Low (Permissive)	4, 5	2 (a)	C	SR 3.3.5.2.2	≤ 341.7 psig
b. Low Pressure Coolant Injection Pump Discharge Flow–Low (Bypass)	4, 5	1 per loop (a)	D	SR 3.3.5.2.2	≥ 1107 gpm
3. Shutdown Cooling System (SDC) Isolation					
a. Reactor Vessel Water Level–Low	(b)	1 per trip system	B	SR 3.3.5.2.1 SR 3.3.5.2.2	≥ 2.65 inches
4. Reactor Water Cleanup System Isolation					
a. Reactor Vessel Water Level–Low	(b)	1 per trip system	B	SR 3.3.5.2.1 SR 3.3.5.2.2	≥ 2.65 inches

(a) Associated with an ECCS subsystem required to be OPERABLE by LCO 3.5.2, "RPV Water Inventory Control."

(b) When automatic isolation of the associated penetration flow path(s) is credited in calculating DRAIN TIME.