

Commonwealth Edison Company  
Dresden Generating Station  
6500 North Dresden Road  
Morris, IL 60450  
Tel 815-942-2920



March 13, 1996

JSP Ltr. #96-0035

U. S. Nuclear Regulatory Commission  
Attn: Docket Control Desk  
Washington, D.C. 20555

Subject: Dresden Nuclear Power Station Units 2 and 3  
Complete Version of Technical Specification Upgrade Program (TSUP) and List  
of Deferred Surveillance Requirements  
NRC Docket Nos. 50-237/249

- References:
- a) J.S. Perry to USNRC, dated, March 1, 1995 (ComEd supplement to TSUP cleanup)
  - b) P.Piet to USNRC dated, November 14, 1995 (ComEd submittal for TSUP cleanup)
  - c) J. Schrage to USNRC, dated September 1, 1995 (ComEd submittal for TSUP Sec 6.0 for Dresden)

The purpose of this letter is to provide a complete version of the TSUP pages that reflect the current configuration of Dresden Station and to specify surveillance requirements that will not be current at upon full implementation. The attached listing reflects all previously approved Sections for the TSUP project and includes any additional changes identified in the Referenced letters.

Each previous change to the TSUP pages, up to and including the Referenced submittals, has received both on-site and off-site review, in accordance with station procedures. In addition, Dresden has performed additional, supplemental reviews of the TSUP pages to determine their adequacy and accuracy. Therefore, to the best of my knowledge and belief, the information contained therein is true and correct. Such information has been reviewed in accordance with Company practice and I believe it to be reliable.

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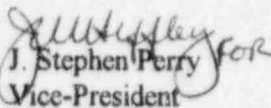
ADD

March 12, 1996

ComEd also requests that implementation the surveillances listed in Attachments B be delayed until the next refuel outage for the effected unit. These surveillances are relatively new, require significant detailed analyses to create, add marginal benefits to safety and require the reactor to be in a shutdown condition to perform. Making these surveillances current prior to TSUP implementation will force shutdown of the units and delay realization of the other benefits needed for successful operation.

ComEd requests that the NRC staff review and approve the attached TSUP pages as well as approve the deferral of the performance of surveillances specified herein by April 21, 1996 in order to ensure that an orderly implementation of the project can be completed. If there are any further questions, please contact the Dresden Regulatory Assurance Supervisor, P. G. Holland.

Sincerely,

  
J. Stephen Perry  
Vice-President  
BWR Operations

Attachments: A: Technical Specification Upgrade Program Pages - Complete Listing  
B: List of deferred surveillance requirements

cc: H. J. Miller, Regional Administrator - RIII  
J. F. Stang, Project Manager - NRR  
C. L. Vanderniet, Senior Resident Inspector - Dresden  
Office of Nuclear Facility Safety - IDNS

## ATTACHMENT A

### Technical Specification Upgrade Program Dresden Nuclear Power Station

#### Deferred TSUP Surveillance Requirements

- |                                    |   |
|------------------------------------|---|
| Surveillance Requirement 4.1.A.2   | RPS Logic System Functional Test                              |
| Surveillance Requirement 4.2.A.2   | Primary & Secondary Containment Logic System Functional Tests |
| Surveillance Requirement 4.2.J.2   | Feedwater Pump Trip Logic System Functional Test              |
| Surveillance Requirement 4.6.F.1.b | Relief Valve Logic System Functional Test                     |
| Surveillance Requirement 4.9.A.9   | Simultaneous Diesel Generator Start                           |
| Surveillance Requirement 4.9.A.10  | Diesel Storage Tank Cleaning (Unit 3 and Unit 2/3 only)       |

## **ATTACHMENT B**

**Technical Specification Upgrade Program Pages - Complete Listing  
Dresden Nuclear Power Station**