



October 23, 1996

JSPLTR 96-0118

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

Subject: Dresden Nuclear Power Station Unit 1
Application for Amendment of Facility Operating License DPR-2
Technical Specifications, NRC Docket No. 050-010

Reference a: R. M. Pulsifer letter to D. L. Farrar dated June 28, 1996.

Pursuant to 10 CFR 50.90, Commonwealth Edison Company (ComEd) proposes to amend Appendix A, Technical Specifications, of Facility Operating License DPR-2. This proposed amendment is a complete revision of the Technical Specifications to the same format as Dresden Unit 2/3 as approved by the NRC Staff in Amendments 150 and 145 (reference a). This amendment will replace all existing pages of the Unit 1 Technical Specifications.

This proposed amendment request is subdivided as follows:

1. Attachment 1 provides an executive summary of the proposed changes.
2. Attachment 2 provides a description of the changes and a comparison to the current Technical Specifications.
3. Attachment 3 provides a copy of the proposed new pages which are to be substituted for the existing pages in their entirety.
4. Attachment 4 includes a marked-up copy of the Technical Specification pages for Dresden Unit 1 with the requested changes indicated.

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5. Attachment 5 describes ComEd's evaluations performed in accordance with 10 CFR 50.92(c), which confirms that no significant hazards consideration is involved, an Environmental Assessment Applicability Review per 10 CFR 51.21 and identification per 10 CFR 50.92(b) that no irreversible consequences will occur as a result of this proposed amendment.
6. Attachment 6 provides for information only a matrix that compares Dresden Unit 1 to the Technical Specifications approved for the Trojan Plant and a matrix that illustrates where the items removed from the Technical Specifications in accordance with Generic Letter 89-01 have been placed in the current revision of the Off-Site Dose Calculation Manual.

This proposed amendment has been reviewed and approved by ComEd's On-Site and Off-Site Review in accordance with ComEd procedures.

ComEd requests that NRC review of the Technical Specification changes be completed by April 1, 1997 to support the change in the Unit 1 organization. Since this proposed amendment reflects the utilization of licensing methods that have already received NRC safety evaluations for Unit 2/3, this change is considered administrative in nature.

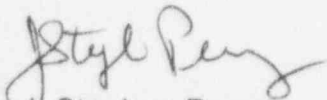
To the best of my knowledge and belief, the statements contained above are true and correct. In some respect these statements are not based on my personal knowledge, but obtained from information furnished by other ComEd employees, contractor employees, and consultants. Such information has been reviewed in accordance with company practice, and I believe it to be reliable.

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ComEd is notifying the State of Illinois of this application for amendment by transmitting a copy of this letter and its attachments to the designated state official.

Please direct any questions you may have concerning this submittal to this office.

Sincerely,



J. Stephen Perry
Site Vice President
Dresden Station

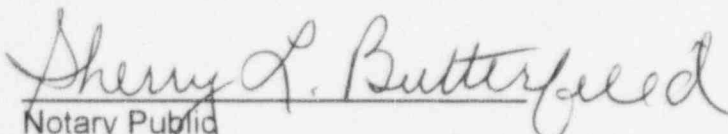
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Enclosures



Subscribed and Sworn to before me

on this 24 day of
October, 1996.


Notary Public

Attachments:

1. Executive Summary of the Proposed Changes
2. Description of Changes and Comparison to Current Technical Specifications
3. Copy of the Proposed New Technical Specification Pages
4. Marked-up Technical Specification Pages
5. Evaluation of Significant Hazards Consideration, Environmental Assessment Applicability Review and Irreversible Consequences Review
6. Information Only Matrices for comparison

cc: A. Bill Beach, Regional Administrator, Region III
M. K. Webb, Project Manager, NRR (Unit 1)
C. L. Vanderniet, Senior Resident Inspector, Dresden
Office of Nuclear Facility Safety - IDNS
File: Numerical

ATTACHMENT 1

EXECUTIVE SUMMARY

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The purpose of this submittal is to revise Dresden Unit One Technical Specifications, incorporating similar applicable revisions made pursuant to the Dresden Unit Two and Three Technical Specification Upgrade Program (Unit 2/3 TSUP), which have been approved by the Nuclear Regulatory Commission (NRC) in Reference a.

The proposed Unit 1 Technical Specifications have been modified into the same format as the Dresden Unit 2/3 TSUP. This promotes safety in that it assures consistency in implementation and appropriate application and usage is simplified. The Unit 1 Technical Specification submittal has also been revised to reflect modifications due to Unit 1 decommissioning status.

Some of the existing sections have been relocated to licensee administrative control to be consistent with the Dresden Unit 2/3 TSUP. Section 6, Administrative Controls, has been completely restructured. Specification 6.12 regarding control of high radiation areas was added to make Unit 1 Technical Specifications the same as those approved for Unit 2/3. Sections relating to airborne and liquid effluent releases and environmental monitoring have been relocated to the Offsite Dose Calculation Manual (ODCM) in accordance with Generic Letter 89-01.

These changes were also compared to the NRC approved technical specifications for the decommissioned plants Trojan and San Onofre Unit 1. Although the format is somewhat different, the applicable content is essentially the same.

Dresden Unit 1 is on a site shared with two operating nuclear plants which have Operators, Health Physics Technicians and Property Loss Prevention Personnel available 24 hours a day. No Unit 1 licensed operators are required for operation, surveillance or maintenance. For this reason Dresden Unit 1 relies on Non-licensed Operators, Control Room Operators and Supervisors from Unit 2/3 for monitoring and supervision of Unit 1 activities affecting the safe storage of irradiated fuel. This description in the proposed Technical Specifications is not a change but is provided to clarify the description of existing practices at Dresden Station.

ATTACHMENT 2

DESCRIPTION OF CHANGES

DESCRIPTION OF AMENDMENT REQUEST

The changes proposed in this amendment request are made to:

- 1) improve the understanding and usability of Unit 1 Technical Specifications(TS),
- 2) incorporate technical improvements approved for other plants, which have been found to be applicable to Dresden Unit 1.
- 3) make the Unit 1 TS as similar as possible to the Unit 2/3 TS to minimize administrative control differences.
- 4). more clearly describe the organization having responsibility for Dresden Unit 1.

GENERIC CHANGES

The format of the proposed Technical Specifications (TS) is adopted from the Dresden Unit 2/3 Technical Specifications which more closely follow the Standard Technical Specifications (NUREG-0123). These proposed specifications are modeled after amendment requests submitted within the Dresden Unit 2/3 Technical Specifications Upgrade Program (TSUP) except where limited by design, decommissioning status or applicable regulatory requirements. A comparison was made against the Technical Specifications approved for the Trojan and San Onofre Unit 1 facilities and those specifications were used as a model for issues related to decommissioned plants.

COMPARISON OF CURRENT TECHNICAL SPECIFICATIONS (CTS) TO PROPOSED TECHNICAL SPECIFICATION AND BASIS OF THE PROPOSED CHANGES

CTS TABLE OF CONTENTS

1. The proposed Table of Contents was rewritten to correspond to the changes reflected in this proposed amendment. Pages left intentionally blank were deleted. All blank pages were removed from this proposed amendment. This change is administrative only.

CTS DEFINITIONS

1. The existing Definitions are proposed to be deleted since the terms defined were either no longer in the remaining LCOs, surveillance requirements or administrative controls, or needed to be revised to correspond to the Unit 2/3 TSUP. The page heading was revised to that in the Unit 2/3 TSUP.
2. The definitions of OFFSITE DOSE CALCULATION MANUAL (ODCM) and PROCESS CONTROL PROGRAM (PCP) are proposed to be added word for word from the Unit 2/3 TSUP. This is proposed since the ODCM and PCP are Dresden Site documents and the definitions are to be consistent with the applicable definitions approved in the Unit 2/3 TSUP. These definitions originate in Generic Letter 89-01.

CTS DEFINITIONS (cont)

3. The definition for REPORTABLE EVENT is proposed for addition. This definition is word for word from the Unit 2/3 TSUP. This proposed definition was added here to allow removal of the reportable event requirement from Section 6.3 and make Unit 1 consistent with the Unit 2/3 TSUP. This is also consistent with the TS approved for the Trojan Plant.

CTS 3/4.8 Plant Systems

1. Subsections 3/4.8.A, "Airborne Effluents", 3/4.8.B, "Liquid Effluents", 3/4.8.E "Radioactive Effluent Monitoring Availability" and 3/4.8.H "General", are proposed to be deleted consistent with the Unit 2/3 TSUP. This was done per the provisions of Generic Letter 89-01. These requirements are currently reflected in the ODCM. The ODCM is required to be submitted to the NRC following any change. A matrix of current Technical Specifications (CTS) requirements to ODCM location is included as part of Attachment 6 for Information Only
2. It is proposed to modify Subsection 3/4.8.G, "Miscellaneous Radioactive Materials Sources", to match the approved Unit 2/3 TSUP as follows:
 - a. revise CTS 3/4.8.G to the Unit 2/3 TSUP format and rename the section, "Sealed Source Contamination",
 - b. change the requirement to prepare and submit a Special Report if excessive leakage is found, to an annual report, as in the Unit 2/3 TSUP.
 - c. delete the requirement to maintain a complete inventory of radioactive materials in the licensee's possession at all times. This requirement will be added to the Unit 1 Decommissioning Plan
3. CTS Subsection 3/4.8.D, "Radioactive Waste Storage" is proposed to be modified to the TSUP format and moved and retitled 3/4.8.J, "Liquid Radwaste Storage". The proposed requirements and surveillances remain the same as the current TS. This change is administrative in nature as all limits and bases remain the same.

CTS 3/4.8 Bases

1. The Bases for "Airborne Effluents", "Liquid Effluents" and "Environmental Radiological Monitoring Program" are proposed to be deleted since these sections have been relocated from the Limiting Condition for Required Equipment and Surveillance requirements sections to the ODCM.
2. The Bases for Radioactive Effluent Monitoring Availability (CTS 3/4.8.E) is proposed to be deleted. This bases had not been included in Amendments 37 or 38 to the Unit 1 TS and with this proposed change is actually indicated as deleted in the Table of Contents and removed from this Bases page.
3. The Bases for CTS 3/4.8.G, "Miscellaneous Radioactive Materials Sources" are proposed to be changed to those in the 2/3 TSUP titled "Sealed Source Contamination." This makes Unit 1 TS consistent with Unit 2/3 TSUP Bases.
4. The Bases for proposed section 3/4.8.J "Liquid Radwaste Storage" remains unchanged from that previously in CTS 3/4.8.D Bases.

CTS 3/4.10 Fuel Handling and Storage

1. Subsection 3/4.10.C, "Fuel Storage Pool Water Level", and Subsection 3/4.10.F, "Fuel Storage Pool Water Quality" are proposed to be combined into subsection 3/4.10 and rewritten into the Unit 2/3 TSUP format. All existing requirements, surveillances and actions have been retained. Additional actions have been added in the event of low spent fuel pool water level. These actions act to improve safety of the fuel handlers in the Spent Fuel Storage Pool Building and are consistent with Unit 2/3 TSUP requirements.
2. Subsection 3/4.10.E is proposed to be moved to Subsection 5.3.A. This states that fuel shall not be loaded into the reactor core. The Design Features section is a logical placement and is consistent with the Unit 2/3 TSUP. No requirement has been changed, so this change is administrative in nature.

CTS 5.0 Design Features

1. CTS 5.1.A, "Site", is proposed to be incorporated as Subsection 5.1.A. Reference is made that Unit 1 shares an Exclusion Zone with Units 2 and 3. This "Exclusion Zone" is fully described in the Unit 2/3 UFSAR.
2. It is proposed to add a new subsection for numbering, 5.1.B, "Low Population Zone" to match the Unit 2/3 TSUP. This is noted as deleted since it is unnecessary for Unit 1. This matches the approved Trojan Plant Technical Specifications.

CTS 5.0 Design Features (cont)

3. It is proposed to add a new subsection, 5.1.C, "Radioactive Gaseous Effluents", to match the Unit 2/3 TSUP and reference the ODCM.
4. A new subsection, 5.1.D, "Radioactive Liquid Effluents", is proposed to be added to match the Unit 2/3 TSUP and reference the ODCM.
5. New subsections 5.2, 5.4 and 5.5 are proposed to be added to match Unit 2/3 TSUP. Subsections 5.2, "Containment", and 5.4, "Reactor Coolant System" are indicated as deleted since they are not applicable to Unit 1 which is in decommissioning. Subsection 5.5 is listed as "intentionally blank" as it is in the Unit 2/3 TSUP.
6. CTS 3.10.E is proposed to be moved into subsection 5.3, "Reactor Core" which is consistent with the Unit 2/3 TSUP. The requirement not to load fuel into the reactor core remains unchanged.
7. CTS 5.5 "Fuel Storage" is proposed to be moved to section 5.6 to be consistent with the Unit 2/3 TSUP.

CTS 6.1 Organization, Review, Investigation and Audit

1. CTS 6.1.A.1 is proposed to be moved intact to TS 6.2.A.1 to be consistent with the Unit 2/3 TSUP.
2. CTS 6.1.A.2 is proposed to be moved to TS 6.2.A.2 and revised to state that the Unit 1 Decommissioning Plant Manager has responsibility for Unit 1 and shall have control over those Unit 1 activities necessary for the operation and maintenance of structures and systems necessary for the safe storage of irradiated fuel. This is consistent with the Unit 2/3 TSUP formatting. The Unit 1 Decommissioning Plant Manager is a new title proposed to be added to the Unit 1 Technical Specifications. The position will be described in a revision to the Unit 1 Decommissioning Plan and in a future revision to the ComEd Quality Assurance Topical Report.

CTS 6.1 Organization, Review, Investigation and Audit (cont)

3. CTS 6.1.A.3 is proposed to be moved to TS 6.2.A.3 to be consistent with the Unit 2/3 TSUP. This change is administrative in nature.
4. CTS 6.1.A.4 is proposed to be moved intact to TS 6.2.A.4 to be consistent with TSUP.
5. A new proposed TS, subsection 6.1 "Responsibility", has been added to be consistent with the Unit 2/3 TSUP. This new section clearly specifies that the Unit 1 Decommissioning Plant Manager has responsibility for the Unit 1 facility. It also calls out that the Unit 2/3 Station Manager has the responsibility to provide support as delegated by the Unit 1 Decommissioning Plant Manager for programs such as ODCM and PCP. In addition the Unit 2/3 Shift Manager, has been designated as responsible for the safe overall operation of Dresden Site under all conditions, including making notification to the NRC of REPORTABLE EVENTS. This is similar to the TS provisions approved for San Onofre Unit 1, Amendment 155, dated December 28, 1993.
6. CTS 6.1.C Shift Manning and Table 6.1.1 are proposed to be deleted as not applicable to Unit 1 which is in decommissioning. Staffing responsibilities are covered in Proposed Technical Specification 6.2.B. There are no Dresden Unit 1 Reactor Operators, Senior Reactor Operators or Limited Senior Reactor Operators licenses as noted in the NRC Order Authorizing Decommissioning dated September 3, 1993.
7. Proposed TS Subsection 6.2.B has been revised to describe staffing to maintain monitoring and assignment of responsibility for Unit 1. This is modeled on a combination of format and sequencing from the Unit 2/3 TSUP and Trojan Plant Technical Specifications. The proposed wording provides a clearer definition of staff responsibilities than provided in the current TS. This ensures that with the separation of the Unit 1 organization clear responsibility is maintained for storage of Unit 1 irradiated fuel while fuel is stored in the Unit 1 Spent Fuel Pool. The proposed wording is more prescriptive and reflects current practices at Dresden Station.

CTS 6.1 Organization, Review, Investigation and Audit (cont)

- a. Proposed TS 6.2.B.1 states that a non-licensed operator specified in the Unit 2/3 TSUP shall have responsibility for Unit 1. This operator will provide local monitoring of Unit 1 spent fuel pool and equipment.
 - b. Proposed TS 6.2.B.2 assigns one of the control room operators required by the Unit 2/3 TSUP to have responsibility for Unit 1. This operator will provide remote monitoring of the limited Unit 1 instrumentation still remaining in the Unit 2/3 Control Room.
 - c. Proposed TS 6.2.B.3 specifies that a person qualified in radiation protection procedures be on site and assigned to Unit 1 during fuel handling operations. This will ensure Unit 1 radiation protection coverage during fuel movement. This is a new requirement.
 - d. Proposed TS 6.2.B.4 requires that a qualified person directly supervises all fuel handling operations. This person will be a Senior Reactor Operator licensed on Unit 2/3 or a person qualified by an approved training program as a "Qualified Unit 1 Supervisor." In either case the person will be a trained Certified Fuel Handler on Unit 1. Qualified Unit 1 Supervisor is defined in the footnote on page 6-3.
 - e. Proposed TS 6.2.B.5 is a word for word copy of the Unit 2/3 TSUP specification limiting the working hours of Unit 1 Staff.
 - f. Proposed TS 6.2.B.6 states that either the Operations Manager or the Shift Operations Supervisor shall hold an active Unit 2/3 Senior Reactor Operators License. This models the Unit 2/3 TSUP and ensures that a person that is currently trained on Unit 1 in the Licensed Operator Retraining Program is in charge of the Control Room personnel monitoring Unit 1 activities.
- 8 CTS 6.1.D is encompassed within proposed Specification 6.3. The requirement that the individual filling the position of "Site Engineering Manager" meets the requirements for "Technical Manager" as described in Section 4.2.4 of ANSI N18.1-1971 is redundant to existing requirements for station staff and is proposed to be deleted. This is consistent with the Unit 2/3 TSUP.

CTS 6.1 Organization, Review, Investigation and Audit (cont)

9. CTS 6.1.E has been moved to proposed subsection 6.4, Training. The station fire protection program is addressed in the Unit 1 License. This is consistent with the Unit 2/3 TSUP.
10. CTS 6.1.F is proposed to be deleted. Retraining requirements for site personnel are adequately controlled via the provisions of ANSI N18.1-1971. As such, the requirements specified in CTS 6.1.F are redundant and unnecessary for inclusion in the TS. This is consistent with the Unit 2/3 TSUP.

CTS 6.2 Procedures and Programs

1. CTS 6.2.A, regarding the controls for written procedures is encompassed within the proposed Unit 1 Technical Specification 6.8.A. Although the wording is different, Reg Guide 1.33, Revision 2, February 1978 covers the same issues. The proposed Unit 1 Technical Specifications are word for word the same as those approved for the Unit 2/3 TSUP.
2. CTS 6.2.B regarding Radiation Protection Program Procedures is encompassed within the proposed Unit 1 Technical Specification 6.11. Proposed section 6.11 is identical to that approved for the Unit 2/3 TSUP.
3. CTS 6.2.C regarding technical review and control of procedures and CTS 6.2.D regarding temporary changes to procedures are proposed to be deleted. Control of procedure establishment, control and approval will be described in the Unit 1 Decommissioning Plan. This is word for word the same as that approved for the Unit 2/3 TSUP.
4. CTS 6.2.E, drills of emergency procedures, has not been retained within the proposed Unit 1 Technical Specifications. The GSEP procedure requirements are encompassed within proposed Technical Specification 6.8.A.4 that specifies written procedures shall be established, implemented and maintained covering the activities associated with the implementation of the Generating Station Emergency Plan. This is consistent with the Unit 2/3 TSUP.

CTS 6.3 Reportable Event Action

1. CTS 6.3, actions to be taken in the event of an reportable event, has not been retained in the proposed Unit 1 Technical Specifications. The organization and responsibilities of individuals and functions are adequately described in plant procedures and the Quality Assurance Program. Eliminating repetition of these details from the Technical Specification will not compromise plant safety. The removal of these items is consistent with changes addressed in NRC letter from W. T. Russell to Owners Group Chairmen, dated October 25, 1993. In addition, the proposed changes are consistent with the guidance provided in the BWR Improved Standard Technical Specifications, NUREG-1433. Reportable Event has been added to the Definitions Section of the proposed Unit 1 Technical Specifications.

CTS 6.5 Plant Operating Records

1. Requirements contained in CTS 6.5 have not been retained in the proposed Unit One Technical Specification. The requirements related to Record Retention will be described in the revised Decommissioning Plan. The removal of these items is consistent with changes addressed in NRC letter from W. T. Russell to Owners Group Chairmen, dated October 25, 1993. In addition, the proposed changes are consistent with the guidance provided in the BWR Improved Standard Technical Specification, NUREG- 1433. This is consistent with the Unit 2/3 TSUP.

CTS 6.6 Reporting Requirements

1. CTS 6.6.A.2 is encompassed within the proposed Unit 1 Technical Specification 6.9.A.2.a. The proposed Unit 1 Technical Specifications are equivalent to those submitted for the Unit 2/3 TSUP.
2. CTS 6.6.B, Reportable Events, has not been retained in the proposed Unit 1 Technical Specification 6.0. The providing a section for reportable events within the TS is redundant to the requirments of 10 CFR 50.73, therefore the regulation need not be repeated within the Technical Specifications. REPORTABLE EVENTS has been added to the Definitions Section of the Proposed Technical Specifications. This is consistent with the approved the Unit 2/3 TSUP.

CTS 6.6 Reporting Requirements (cont)

3. CTS 6.6.C.1 radioactive effluent release report, is encompassed within the proposed Unit 1 Technical Specification 6.9.A.4. The CTS requirement to submit the report to the Commission "within 60 days after January 1" is proposed to be changed to "prior to April 1". This change is administrative in nature and aligns Unit 1 with the Unit 2/3 TSUP. The change does not adversely impact the ability to meet applicable regulatory requirements related to liquid and gaseous effluents.
4. CTS 6.6.C.2.a(1) is included in the ODCM, Chapter 12. The proposed Unit 1 Technical Specification requirements are the same as those approved for the Unit 2/3 TSUP.
5. CTS 6.6.C.2.a(2) is encompassed within the proposed Unit 1 Technical Specification 6.9.A.3. The proposed Unit 1 Technical Specification requirements are the same as those approved for the Unit 2/3 TSUP. The CTS requirement to submit the report to the NRC by March 31 is proposed to be changed to May 1, to match the Unit 2/3 TSUP.
6. CTS 6.6.C.3 is encompassed within the proposed Unit 1 Technical Specification 6.9.B. The proposed revised Unit 1 Technical Specification requirements are the same as those approved for the Unit 2/3 TSUP.
7. CTS Table 6.6.1 has not been retained in the proposed Unit 1 Technical Specification 6.0. The individual requirements for periodic special reports are described within individual proposed Unit 1 Technical Specifications. This is consistent with the TS approved for the Trojan Plant, Plant Amendment 194 issues March 31, 1995.

CTS 6.8 OFF SITE DOSE CALCULATION MANUAL (ODCM)

1. CTS 6.8.A regarding the submittal of the ODCM at the time of Radiological Effluent Technical Specification (RETS) to the Commission is superseded by the proposed Unit 1 Technical Specification 6.14.A.3. The proposed Unit 1 Technical Specification 6.14.A.3 requirements are consistent with the guidance provided in Generic Letter 89-01 and with the Unit 2/3 TSUP.
2. CTS 6.8.B is encompassed within the proposed Unit 1 Technical Specification 6.14.A.1 and 6.14.A.2. The proposed Unit 1 Technical Specification 6.14 requirements are consistent with guidance provided in Generic Letter 89-01 and with the Unit 2/3 TSUP.

CTS 6.8 OFF SITE DOSE CALCULATION MANUAL (ODCM) (cont)

3. CTS 6.8.B.1 has been moved to proposed Unit 1 specification 6.14.A.3. This is consistent with the Unit 2/3 TSUP.
4. CTS 6.8.B.2 has been moved to proposed Unit 1 specification 6.14.A.2. Approval has been changed from the Onsite Review Function to the Unit 2/3 Station Manager as delegated by the Unit 1 Decommissioning Manager. This is similar to the process approved in the Unit 2/3 TSUP.

CTS 6.9 PROCESS CONTROL PROGRAM (PCP)

1. CTS 6.9.A regarding the definition of the PCP is encompassed within proposed Technical Specification Section 1.0, "Definitions." This is consistent with the Unit 2/3 TSUP.
2. The CTS 6.9.B requirements are obsolete and are based upon Dresden and Quad Cities' TS submittals in the early 1980's related to the incorporation of the original Radiological Effluent Technical Specification (R. Bevan letter to D. Farrar [for Quad Cities], dated June 19, 1984). The proposed revised Unit 1 Technical Specification 6.13.A.2 requirements are consistent with the guidance provided in Generic Letter 89-01 and the Unit 2/3 TSUP.
3. CTS 6.9.C is encompassed within the proposed Unit 1 Technical Specification 6.13. The proposed Unit 1 Technical Specification 6.13 requirements are consistent with the guidance provided in Generic Letter 89-01. Approval has been changed from the Onsite Review Function to the Unit 2/3 Station Manager as delegated by the Unit 1 Decommissioning Plant Manager. This is similar to that approved for the Unit 2/3 TSUP.

CTS 6.10 Major Changes to Radwaste Treatment Systems

Current Specification 6.10, Major Changes to Radioactive Waste Treatment Systems is being proposed for deletion in accordance with Generic Letter 89-01, "Implementation of Programmatic Controls for Radiological Effluent Technical Specification in the Administrative Controls Section of the Technical Specification and Relocation of procedural details of RETS to the OFFSITE DOSE CALCULATION MANUAL or to the PROCESS CONTROL PROGRAM". The programmatic requirements contained within the current specification are relocated to the OFFSITE DOSE CALCULATION MANUAL in accordance with Generic Letter 89-01 and with the Unit 2/3 TSUP.

Miscellaneous New Requirements

1. Proposed Specification 6.8.D.4 is a new specification for the Radioactive Effluent Controls Program. The program ensures that the doses to the members of the public from radioactive effluents will remain as low as reasonably achievable. This is word for word from the Unit 2/3 TSUP and consistent with Generic Letter 89-01.
2. The proposed Unit 1 Technical Specification 6.12.A incorporates the definition of HIGH RADIATION AREA as revised in 10 CFR Part 20. The proposed Unit 1 requirements are the same as the Unit 2/3 TSUP.
3. The proposed Unit 1 Technical Specification 6.12.B removes the requirement to establish a stay time for personnel entering HIGH RADIATION AREA(s) with dose rates above 1000 mrem/hr at 30 cm (12 in.). The revised Unit 1 Technical Specification conservatively includes requirements such that persons entering a HIGH RADIATION AREA with dose rates above 1000 mrem/hr at 30 cm (12 in.) are required to have an alarming radiation monitoring device or to have surveillance and radiation monitoring by a qualified Radiation Protection Technician. This ensures that exposure control is maintained.

In emergency situations which involve personnel injury or actions taken to prevent major equipment damage, surveillance and radiation monitoring of the work area by a qualified individual may be substituted for routine RWP procedures.

The proposed revised Unit 1 Technical Specification requirements are equivalent to CTS requirements previously submitted for Dresden Units 2 and 3.

SUMMARY AND SCHEDULE

The proposed changes to the Dresden Station Technical Specification have been reviewed and approved by the Onsite Review in accordance with controlled Station Procedures. ComEd has reviewed these proposed amendments in accordance with 10CFR 50.92(c) and determined that no significant hazards consideration exist. It is requested that the proposed amendment be approved and made effective 30 days after approval.