

ATTACHMENT 3

PROPOSED AMENDED TECHNICAL SPECIFICATION PAGES

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DRESDEN STATION

UNIT 1

(DPR-2)

DEFINITIONS

<u>SECTION</u>	<u>PAGE</u>
Section 1.0 DEFINITIONS	
OFFSITE DOSE CALCULATION MANUAL (ODCM)	1-1
PROCESS CONTROL PROGRAM (PCP)	1-1
REPORTABLE EVENT	1-1

SAFETY LIMITS and LIMITING SAFETY SYSTEM SETTINGS

<u>SECTION</u>	<u>PAGE</u>
Section 2.0 SAFETY LIMITS and LIMITING SAFETY SYSTEM SETTINGS	
<u>2.1 SAFETY LIMITS</u>	{DELETED}
<u>2.2 LIMITING SAFETY SYSTEM SETTINGS</u>	{DELETED}

BASES

<u>2.1 SAFETY LIMITS</u>	{DELETED}
<u>2.2 LIMITING SAFETY SYSTEM SETTINGS</u>	{DELETED}

LIMITING CONDITION FOR REQUIRED EQUIPMENT and SURVEILLANCE REQUIREMENTS

<u>SECTION</u>	<u>PAGE</u>
Sections 3/4 LIMITING CONDITION FOR REQUIRED EQUIPMENT AND SURVEILLANCE REQUIREMENTS	
3/4.1 through 3/4.7	{DELETED}
<u>3/4.8</u> <u>PLANT SYSTEMS</u>	
3/4.8.A through 3/4.8.F	{DELETED}
3/4.8.G <u>Sealed Source Contamination</u>	3/4.8-1
3/4.8.H	{DELETED}
3/4.8.I	Not used
3/4.8.J <u>Radioactive Waste Storage</u>	3/4.8-2
<u>3/4.9</u>	{DELETED}
<u>3/4.10</u> <u>FUEL HANDLING AND STORAGE</u>	3/4.10-1

LIMITING CONDITION FOR REQUIRED EQUIPMENT and SURVEILLANCE REQUIREMENT BASES

<u>SECTION</u>	<u>PAGE</u>
B 3/4.1 through B 3/4.7	{DELETED}
<u>B 3/4.8</u> <u>PLANT SYSTEMS</u>	
B 3/4.8.A through B 3/4.8.F	{DELETED}
B 3/4.8.G <u>Sealed Source Contamination</u>	B 3/4.8-1
B 3/4.8.H	{DELETED}
B 3/4.8.I	Not used
B 3/4.8.J <u>Radioactive Waste Storage</u>	B 3/4.8-1
B 3/4.9	{DELETED}
<u>B 3/4.10</u> <u>FUEL HANDLING AND STORAGE</u>	B 3/4.10-1

DESIGN FEATURES

<u>SECTION</u>		<u>PAGE</u>
Section 5.0	<u>DESIGN FEATURES</u>	
<u>5.1</u>	<u>SITE</u>	
5.1.A	Site and Exclusion Area	5-1
5.1.B	Low Population Zone	5-1
5.1.C	Radioactive Gaseous Effluents	5-1
5.1.D	Radioactive Liquid Effluents	5-1
<u>5.2</u>	<u>CONTAINMENT</u>	{DELETED}
<u>5.3</u>	<u>REACTOR CORE</u>	5-1
<u>5.4</u>	<u>REACTOR COOLANT SYSTEM</u>	{DELETED}
<u>5.5</u>	[INTENTIONALLY BLANK]	
<u>5.6</u>	<u>FUEL STORAGE</u>	
5.6.A	K_{eff}	5-1

ADMINISTRATIVE CONTROLS

<u>SECTION</u>	<u>PAGE</u>
Section 6.0 <u>ADMINISTRATIVE CONTROLS</u>	
<u>6.1</u> <u>RESPONSIBILITY</u>	
6.1.A Unit 1 Decommissioning Plant Manager	6-1
6.1.B Station Manager	6-1
6.1.C Shift Manager	6-1
<u>6.2</u> <u>ORGANIZATION</u>	
6.2.A Onsite and Offsite Organizations	6-2
6.2.B Unit Staff	6-3
6.2.C Shift Technical Advisor - {DELETED}	6-3
<u>6.3</u> <u>UNIT STAFF QUALIFICATIONS</u>	6-4
<u>6.4</u> <u>TRAINING</u>	6-4
<u>6.5</u> [INTENTIONALLY BLANK]	6-4
<u>6.6</u> [INTENTIONALLY BLANK]	6-4
<u>6.7</u> <u>SAFETY LIMIT VIOLATION</u> - {DELETED}	6-4

ADMINISTRATIVE CONTROLS

<u>SECTION</u>	<u>PAGE</u>
<u>6.8</u>	<u>PROCEDURES AND PROGRAMS</u> 6-5
6.8.A	Procedures 6-5
6.8.B	{DELETED} 6-5
6.8.C	{DELETED} 6-5
6.8.D	Programs 6-5
<u>6.9</u>	<u>REPORTING REQUIREMENTS</u>
6.9.A	Routine Reports 6-8
6.9.B	Special Reports 6-9
<u>6.10</u>	[INTENTIONALLY BLANK] 6-9
<u>6.11</u>	<u>RADIATION PROTECTION PROGRAM</u> 6-9
<u>6.12</u>	<u>HIGH RADIATION AREA</u> 6-10
<u>6.13</u>	<u>PROCESS CONTROL PROGRAM</u> 6-12
<u>6.14</u>	<u>OFFSITE DOSE CALCULATION MANUAL</u> 6-13
	LIST OF TABLES {DELETED}
	LIST OF FIGURES NONE

1.0 DEFINITIONS

The following terms are defined so that uniform interpretation of these specifications may be achieved. The defined terms appear in capitalized type and shall be applicable throughout these Technical Specifications.

OFFSITE DOSE CALCULATION MANUAL (ODCM)

The OFFSITE DOSE CALCULATION MANUAL (ODCM) shall contain the methodology and parameters used in the calculation of offsite doses resulting from radioactive gaseous and liquid effluents, in the calculation of gaseous and liquid effluent monitoring Alarm/Trip Setpoints, and in the conduct of the Environmental Radiological Monitoring Program. The ODCM shall also contain (1) the Radioactive Effluent Controls and Radiological Environmental Monitoring Programs required by Specification 6.8 and (2) descriptions of the information that should be included in the Annual Radiological Environmental Operating and Annual Radioactive Effluent Release Reports required by Specification 6.9.

PROCESS CONTROL PROGRAM (PCP)

The PROCESS CONTROL PROGRAM (PCP) shall contain the current formulas, sampling, analysis, test, and determinations to be made to ensure that processing and packaging of solid radioactive wastes based on demonstrated processing of actual or simulated wet solid wastes will be accomplished in such a way as to assure compliance with 10 CFR Parts 20, 61, and 71, State regulations, burial ground requirements, and other requirements governing the disposal of solid radioactive waste.

REPORTABLE EVENT

A REPORTABLE EVENT shall be any of those conditions specified in Section 50.73 to 10 CFR Part 50.

3.8 - LIMITING CONDITIONS FOR REQUIRED EQUIPMENT

PLANT SYSTEMS

G. Sealed Source Contamination

Each sealed source containing radioactive material either in excess of 100 μCi of beta and/or gamma emitting material or 5 μCi of alpha emitting material shall be free of ≥ 0.005 μCi of removable contamination.

APPLICABILITY:

At all times.

ACTION:

1. With a sealed source having removable contamination in excess of the above limit, withdraw the sealed source from use and either:
 - a. Decontaminate and repair the sealed source, or
 - b. Dispose of the sealed source in accordance with Commission Regulations.
2. With a sealed source leakage test revealing the presence of removable contamination in excess of the above limit, a report shall be prepared and submitted to the Commission on an annual basis.

4.8 - SURVEILLANCE REQUIREMENTS

G. Sealed Source Contamination

1. Test Requirements - Each sealed source shall be tested for leakage and/or contamination by:
 - a. The licensee, or
 - b. Other persons specifically authorized by the Commission or an Agreement State.

The test method shall have a detection sensitivity of at least 0.005 μCi per test sample.

2. Test Frequencies - Each category of sealed sources, excluding startup sources and fission detectors previously subjected to core flux, shall be tested at the frequency described below.
 - a. Sources in use - At least once per 6 months for all sealed sources containing radioactive material:
 - 1) With a half-life > 30 days, excluding Hydrogen 3, and
 - 2) In any form other than gas.
 - b. Stored sources not in use - Each sealed source shall be tested prior to use or transfer to another licensee unless tested within the previous 6 months. Sealed sources transferred without a certificate indicating the last test date shall be tested prior to being placed into use.

3.8 - LIMITING CONDITIONS FOR REQUIRED
EQUIPMENT

PLANT SYSTEMS

J. Liquid Radioactive Storage

The maximum amount of radioactivity in liquid storage in all Dresden Station's above grade tanks shall not exceed 90 curies. All tanks located within the seismic portion of the Chemical Cleaning Building are not considered above grade storage.

APPLICABILITY:

At all times.

ACTION:

With the quantity of radioactive material in the tanks exceeding the above limit, immediately suspend all additions of radioactive material to the tanks and within 24 hours reduce the tank contents to within the limit by recycling the stored liquid to below grade tanks.

4.8 - SURVEILLANCE REQUIREMENTS

J. Liquid Radioactive Storage

A sample from each of the above grade liquid waste tanks shall be taken, analyzed, and recorded every 72 hours. If no additions to a tank have been made since the last sample, the tank need not be sampled until the next addition.

3.10 - LIMITING CONDITIONS FOR REQUIRED EQUIPMENT

FUEL HANDLING AND STORAGE

A. Fuel Storage Pool Water Level and Quality

1. Water Level - Fuel Storage Pool

The Fuel Storage Pool water level shall be maintained at a level of ≥ 18 feet.

2. Water Quality - Fuel Storage Pool

- a. Cl less than or equal to 0.5 ppm
- b. Conductivity less than or equal to 10.0 micromhos per cm at 25°C
- c. pH 5.3 to 8.6

APPLICABILITY:

Whenever irradiated fuel assemblies are in the Fuel Storage Pool.

ACTION:

- 1. With the requirements of Fuel Storage Pool water level specification not satisfied, suspend all movement of fuel assemblies and crane operations with loads in the Fuel Storage Pool area after placing the fuel assemblies and crane load in a safe condition, and restore pool level.
- 2. If any of the water quality specification limits are exceeded, prepare and submit to the NRC, within 30 days, a Special Report which identifies the cause(s) for exceeding the limit(s) and define the corrective actions to be taken to ensure that future water quality is in compliance.

4.10 - SURVEILLANCE REQUIREMENTS

A. Fuel Storage Pool Water Level and Quality

1. Water Level - Fuel Storage Pool

The water level in the Fuel Storage Pool shall be determined to be at least at its minimum required depth at least once per 24 hours.

2. Water Quality - Fuel Storage Pool

The Fuel Storage Pool Water shall be sampled and analyzed at least once per 30 days.

BASES

PLANT SYSTEMS

3/4.8.A through 3/4.8.F - {DELETED}

3/4.8.G Sealed Source Contamination

The limitations on removable contamination for sources requiring leak testing, including alpha emitters, is based on 10 CFR 70.39(c) limits for plutonium. This limitation will ensure that leakage from byproduct, source, and special nuclear material sources will not exceed allowable intake values. Sealed sources, including startup sources and fission detectors, are classified into three groups according to their use, with surveillance requirements commensurate with the probability of damage to a source in that group. Those sources which are frequently handled are required to be tested more often than those which are not. Sealed sources which are continuously enclosed within a shielded mechanism, i.e., sealed sources within radiation monitoring or boron measuring devices, are considered to be stored and need not be tested unless they are removed from the shielded mechanism.

3/4.8.H - {DELETED}

3/4.8.I - Not used

3/4.8.J Liquid Radwaste Storage

The maximum gross radioactivity in liquid storage in the specified tanks has been limited on the basis of an accidental spill from all stated tanks due to a seismic event great enough to damage them. The Chemical Cleaning Building is seismically designed and designed to contain a simultaneous spill from all the contaminated liquid storage tanks housed within. Assuming a low river flow of 3100 ft³/sec, a day period over which the radioactive liquid wastes are diluted in the river, and consumption of the water by individuals at standard man consumption rate (3000 ml/day), the single intake by an individual would not exceed one-third the yearly intake allowable by 10 CFR 20 for unidentified radioisotopes (1×10^{-7} uCi/ml). The factor of 3 was applied to 10 CFR 20 limits as recommended for situations in which population groups could be exposed.

The sampling frequency has been established so that if the maximum amount of gross radioactivity is exceeded, action can be taken to reduce the radioactivity to a level below the specified limit.

BASES

3/4.10.A Fuel Storage Pool Water Level And Quality

To assure there is adequate water to shield and cool the irradiated fuel assemblies stored in the pool, a minimum pool water level is established. The minimum water level of 18 feet is established because it would be a significant change from the normal level, well above a level to assure adequate cooling (just above active fuel) and above the level at which the GSEP action is initiated (5' uncontrolled loss of level with level decreasing).

To prevent the growth of micro-organisms and concern about corrosion of metallic pool structures, quality limits for fuel pool water chemistry have been established.

5.0 DESIGN FEATURES

5.1 SITE

5.1.A Site and Exclusion Area

Dresden Unit 1 is located at the Dresden Nuclear Power Station which consists of a tract of land of approximately 953 acres located in the Northwest quarter of the Morris 15-minute quadrangle (as designated by the U.S. Geological Survey), Goose Lake Township, Grundy County, Illinois. An Exclusion Area is shared with Units 2 and 3.

5.1.B Low Population Zone - {DELETED}

5.1.C Radioactive Gaseous Effluents

Information regarding radioactive gaseous effluents shall be located in the OFFSITE DOSE CALCULATION MANUAL.

5.1.D Radioactive Liquid Effluents

Information regarding radioactive liquid effluents shall be located in the OFFSITE DOSE CALCULATION MANUAL.

5.2 CONTAINMENT - {DELETED}

5.3 REACTOR CORE

5.3.A Nuclear Fuel shall not be loaded into the reactor core. This is to ensure that a critical assembly of nuclear fuel is no longer possible in the reactor core.

5.4 REACTOR COOLANT SYSTEM - {DELETED}

5.5 [INTENTIONALLY BLANK]

5.6 FUEL STORAGE

5.6.A The K_{eff} of the spent fuel storage pool shall be less than or equal to 0.90.

6.0 ADMINISTRATIVE CONTROLS

6.1 RESPONSIBILITY

- 6.1.A The Unit 1 Decommissioning Plant Manager shall have overall responsibility for the Unit 1 Facility and shall delegate in writing the succession to this responsibility during his absence.
- 6.1.B The Unit 1 Decommissioning Plant Manager shall delegate to the Unit 2/3 Station Manager the responsibility to provide site support activities such as the PROCESS CONTROL PROGRAM, the OFFSITE DOSE CALCULATION MANUAL, Site Fire Protection Program, the Radioactive Effluent Controls Program and Emergency Preparedness.
- 6.1.C The Unit 2/3 Shift Manager shall be responsible for directing and commanding the safe overall operation of the Dresden Station Site under all conditions. This shall include immediate notification of the NRC if required for a REPORTABLE EVENT.

ADMINISTRATIVE CONTROLS

6.2 ORGANIZATION

6.2.A Onsite and Offsite Organizations

Onsite and offsite organizations shall be established for unit operation and corporate management, respectively. The onsite and offsite organizations shall include the positions for activities affecting the safe storage of the irradiated fuel.

1. Lines of authority, responsibility, and communication shall be established and defined for the highest management levels through intermediate levels to and including all operating organization positions. These relationships shall be documented and updated, as appropriate, in the form of organization charts, functional descriptions of departmental responsibilities and relationships, and job descriptions for key personnel positions, or in equivalent forms of documentation. These requirements shall be documented in the Quality Assurance Manual.
2. The Unit 1 Decommissioning Plant Manager shall have overall responsibility for Unit 1 and shall have control over those Unit 1 activities necessary for operation and maintenance of structures and systems necessary for the safe storage of irradiated fuel.
3. The Chief Nuclear Officer (CNO) shall have the corporate responsibility for overall plant nuclear safety and shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the plant to ensure nuclear safety.
4. The individuals who train the staff and those who carry out health physics and quality assurance functions may report to the appropriate onsite manager; however, they shall have sufficient organizational freedom to ensure their independence from operating pressures.

ADMINISTRATIVE CONTROLS

6.2.B UNIT STAFF

The Unit Staff organization shall be as follows:

1. One of the non-licensed operators required for Unit 2/3 shall be assigned responsibility for Unit 1 while fuel is stored in the Unit 1 Fuel Storage Pool.
2. One of the persons qualified to stand watch in the Unit 2/3 control room shall be assigned responsibility for Unit 1 while irradiated fuel is stored in the Unit 1 Fuel Storage Pool.
3. An individual qualified in radiation protection procedures shall be on-site and assigned to Unit 1 during Unit 1 fuel handling operations.
4. All fuel handling operations shall be directly supervised by a Qualified Unit 1 Supervisor.^(a)
5. Administrative procedures shall be developed and implemented to limit the working hours of unit staff who perform operations on the Unit 1 irradiated fuel. e.g. Qualified Unit 1 Supervisor, health physicists, auxiliary operators, key maintenance personnel and fuel handlers.

The amount of overtime worked by unit staff members who perform work on Unit 1 irradiated fuel shall be limited in accordance with the NRC Policy Statement on working hours (Generic Letter 82-12)

6. The Unit 2/3 Operations Manager or Unit 2/3 Shift Operations Supervisor shall hold an active Unit 2/3 Senior Reactor Operators License.

6.2.C SHIFT TECHNICAL ADVISOR - {DELETED}

(a) A Qualified Unit 1 Supervisor is a person who has a valid Senior Reactor Operators License on Units 2(3), (SRO or SRO-L) or a person certified to an approved training program as a Qualified Unit 1 Supervisor.

ADMINISTRATIVE CONTROLS

6.3 UNIT STAFF QUALIFICATIONS

Each member of the unit staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971, "Selection and Training of Nuclear Plant Personnel", dated March 8, 1971, except for the Radiation Protection Manager, who shall meet or exceed the qualifications of the Radiation Protection Manager as specified in Regulatory Guide 1.8, September 1975. NRC licenses are not required for Unit 1 staff as noted in the Order Authorizing Decommissioning dated September 3, 1993.

6.4 TRAINING

A retraining and replacement program for the unit staff shall be maintained under the direction of the appropriate onsite manager. Training shall be in accordance with ANSI N18.1-1971 for appropriate designated positions and shall include familiarization with relevant industry operational experience.

6.5 [INTENTIONALLY LEFT BLANK]6.6 [INTENTIONALLY LEFT BLANK]6.7 SAFETY LIMIT VIOLATION - {DELETED}

ADMINISTRATIVE CONTROLS

6.8 PROCEDURES AND PROGRAMS

6.8.A Written procedures shall be established, implemented, and maintained covering the activities referenced below:

1. The procedures applicable to the safe storage of irradiated fuel recommended in Appendix A, of Regulatory Guide 1.33, Revision 2, February 1978;
2. Emergency Operating Procedures, - {DELETED}
3. Station Security Plan implementation,
4. Generating Station Emergency Response Plan implementation,
5. PROCESS CONTROL PROGRAM (PCP) implementation,
6. OFFSITE DOSE CALCULATION MANUAL (ODCM) implementation, and
7. Fire Protection Program implementation.

6.8.B {DELETED}

6.8.C {DELETED}

6.8.D The following programs shall be established, implemented, and maintained:

1. Reactor Coolant Sources Outside Primary Containment - {DELETED}
2. In-Plant Radiation Monitoring - {DELETED}
3. Post Accident Sampling - {DELETED}

ADMINISTRATIVE CONTROLS

4. Radioactive Effluent Controls Program

A program shall be provided conforming with 10 CFR 50.36a for the control of radioactive effluents and for maintaining the doses to members of the public from radioactive effluents as low as reasonably achievable. The program (1) shall be contained in the ODCM, (2) shall be implemented by station procedures, and (3) shall include remedial actions to be taken whenever the program limits are exceeded. The program shall include the following elements:

- a. Limitations on the operability of radioactive liquid and gaseous monitoring instrumentation including surveillance tests and set-point determination in accordance with the methodology in the ODCM,
- b. Limitations on the instantaneous concentrations of radioactive material released in liquid effluents to unrestricted areas conforming to ten (10) times the concentration values in 10 CFR Part 20, Appendix B, Table 2, Column 2.
- c. Monitoring, sampling, and analysis of radioactive liquid and gaseous effluents in accordance with 10 CFR 20.1302 and with the methodology and parameters in the ODCM,
- d. Limitations on the annual and quarterly doses to a member of the public from radioactive materials in liquid effluents released from each Unit conforming to Appendix I to 10 CFR Part 50,
- e. Determination of cumulative and projected dose contributions from radioactive effluents for the current calendar quarter and current calendar year in accordance with the methodology and parameters in the ODCM at least every 31 days,
- f. Limitations on the operability and use of the liquid and gaseous effluent treatment systems to ensure that the appropriate portions of these systems are used to reduce releases of radioactivity when the projected doses in a 31-day period would exceed 2 percent of the guidelines for the annual dose conforming to Appendix I to 10 CFR Part 50,

ADMINISTRATIVE CONTROLS

- g. Limitations on the dose rate resulting from radioactive materials released in gaseous effluents from the site to areas at or beyond the site boundary shall be limited to the following:
 - a) For noble gases: less than or equal to a dose rate of 500 mrem/yr to the whole body and less than or equal to a dose rate of 3000 mrem/yr to the skin, and
 - b) For Iodine-131, Iodine-133, tritium, and for all radionuclides in particulate form with half-lives greater than 8 days: less than or equal to a dose rate of 1500 mrem/yr to any organ.
 - h. Limitations on the annual and quarterly air doses resulting from noble gases released in gaseous effluents from each Unit to areas beyond the site boundary conforming to Appendix I to 10 CFR Part 50,
 - i. Limitations on the annual and quarterly doses to a member of the public from Iodine-131, Iodine-133, tritium, and all radionuclides in particulate form with half-lives greater than 8 days in gaseous effluents released from each Unit conforming to Appendix I to 10 CFR Part 50,
 - j. Limitations on the annual dose or dose commitment to any member of the public due to releases of radioactivity and to radiation from uranium fuel cycle sources conforming to 40 CFR Part 190.
5. Primary Containment Leakage Rate Testing Program - {DELETED}

ADMINISTRATIVE CONTROLS6.9 REPORTING REQUIREMENTS

In addition, to the applicable reporting requirements of Title 10, Code of Federal Regulations, the following identified reports shall be submitted to the Regional Administrator of the appropriate Regional Office of the NRC unless otherwise noted.

6.9.A. Routine Reports

1. {DELETED}
2. Annual Report

Annual reports covering the activities of the Unit for the previous calendar year, as described in this section shall be submitted prior to May 1 of each year.

The reports required shall include:

- a. Tabulation of the number of station, utility, and other personnel (including contractors) receiving exposures greater than 100 mrem/year and their associated person rem exposure according to work and job functions, e.g., surveillance, inservice inspection, routine maintenance, special maintenance (describe maintenance), waste processing, and fuel handling. The dose assignments to various duty functions may be estimated based on pocket dosimeter or TLD. Small exposures totaling less than 20% of the individual total dose need not be accounted for. In the aggregate, at least 80% of the total whole body dose received from external sources should be assigned to specific major work functions.
- b. Specific Reactor Coolant Activity - {DELETED}
3. Annual Radiological Environmental Operating Report

The Annual Radiological Environmental Operating Report covering the decommissioning activities during the previous calendar year shall be submitted prior to May 1 of each year. The report shall include summaries, interpretations, and analysis of trends of the results of the Radiological Environmental Monitoring Program for the reporting period. The material provided shall be consistent with the objectives outlined in (1) the ODCM and (2) Sections IV.B.2, IV.B.3, and IV.C of Appendix I to 10 CFR Part 50.

6.0 ADMINISTRATIVE CONTROLS

4. Radioactive Effluent Release Report

The Radioactive Effluent Release Report covering the decommissioning activities during the previous calendar year shall be submitted prior to April 1 of each year. The report shall include a summary of the quantities of radioactive liquid and gaseous effluents and solid waste released from the facility. The material provided shall be (1) consistent with the objectives outlined in the ODCM and PCP and (2) in conformance with 10 CFR 50.36a and Section IV.B.1 of Appendix I to 10 CFR Part 50.

5. Monthly Operating Report - {DELETED}

6. Core Operating Limits Report - {DELETED}

6.9.B Special Reports

Special reports shall be submitted to the Regional Administrator of the NRC Regional Office within the time period specified for each report.

6.10 [INTENTIONALLY LEFT BLANK]6.11 RADIATION PROTECTION PROGRAM

Procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR Part 20 and shall be approved, maintained and adhered to for all operations involving personnel radiation exposure.

ADMINISTRATIVE CONTROLS

6.12 HIGH RADIATION AREA

6.12.A Pursuant to 10 CFR 20.1601(c), in lieu of the requirements of paragraph 20.1601 of 10 CFR Part 20, each high radiation area in which the intensity of radiation is greater than 100 mrem/hr at 30 cm (12 in.) shall be barricaded and conspicuously posted as a high radiation area and entrance thereto shall be controlled by requiring issuance of a Radiation Work Permit (RWP)^(b) (or equivalent document). Any individual or group of individuals permitted to enter such areas shall be provided with or accompanied by one or more of the following:

1. A radiation monitoring device which continuously indicates the radiation dose rate in the area.
2. A radiation monitoring device which continuously integrates the radiation dose rate in the area and alarms when a preset integrated dose is received. Entry into such areas with this monitoring device may be made after the dose rate levels in the area have been established and personnel have been made knowledgeable of them; or
3. An individual qualified in radiation protection procedures with a radiation dose rate monitoring device, who is responsible for providing positive control over the activities within the area and shall perform periodic radiation surveillance at the frequency specified in the RWP (or equivalent document).

(b) Health Physics personnel or personnel escorted by Health Physics personnel shall be exempt from the RWP issuance requirements during the performance of their assigned Radiation Protection duties, provided they are otherwise following plant Radiation Protection Procedures for entry into High Radiation Areas.

ADMINISTRATIVE CONTROLS

6.12.B In addition to the requirements of 6.12.A, areas accessible to personnel with radiation levels greater than 1000 mrem/hr at 30 cm (12 in.) from the radiation source or from any surface which the radiation penetrates shall require the following:

1. Doors shall be locked to prevent unauthorized entry and shall not prevent individuals from leaving the area. In place of locking the door, direct or electronic surveillance that is capable of preventing unauthorized entry may be used. The keys shall be maintained under the administrative control of the Shift Manager on duty and/or health physics supervision.
2. Personnel access and exposure control requirements of activities being performed within these areas shall be specified by an approved RWP.
3. Each person entering the area shall be provided with an alarming radiation monitoring device that continuously integrates the radiation dose rate (such as an electronic dosimeter.) Surveillance and radiation monitoring by a Radiation Protection Technician may be substituted for an alarming dosimeter.
4. {DELETED}
5. For individual HIGH RADIATION AREAS accessible to personnel with radiation levels of greater than 1000 mrem/h at 30 cm (12 in.) that are located within large areas where no enclosure exists for purposes of locking, and where no enclosure can be reasonably constructed around the individual areas, then such individual areas shall be barricaded, conspicuously posted, and a flashing light shall be activated as a warning device.

ADMINISTRATIVE CONTROLS

6.13 PROCESS CONTROL PROGRAM (PCP)

6.13.A Changes to the PCP:

1. Shall be documented and records of reviews performed shall be retained. This documentation shall contain:
 - a. Sufficient information to support the change together with the appropriate analyses or evaluations justifying the change(s) and,
 - b. A determination that the change will maintain the overall conformance of the solidified waste product to existing requirements of Federal, State, or other applicable regulations.
2. Shall become effective after review and acceptance including approval by the Unit 2/3 Station Manager as delegated by the Unit 1 Decommissioning Plant Manager.

ADMINISTRATIVE CONTROLS

6.14 OFFSITE DOSE CALCULATION MANUAL (ODCM)

6.14.A Changes to the ODCM:

1. Shall be documented and records of reviews performed shall be retained. This documentation shall contain:
 - a. Sufficient information to support the change together with the appropriate analyses or evaluations justifying the change(s) and,
 - b. A determination that the change will maintain the level of radioactive effluent control required by 10 CFR 20.1302, 40 CFR Part 190, 10 CFR 50.36a, and Appendix I to 10 CFR Part 50 and not adversely impact the accuracy or reliability of effluent, dose, or setpoint calculations.
2. Shall become effective after review and acceptance, including approval by the Unit 2/3 Station Manager as delegated by the Unit 1 Decommissioning Plant Manager.
3. Shall be submitted to the Commission in the form of a complete, legible copy of the entire ODCM as a part of or concurrent with the Radioactive Effluent Report for the period of the report in which any change to the ODCM was made effective. Each change shall be identified by markings in the margin of the affected pages, clearly indicating the area of the page that was changed, and shall indicate the date (e.g., month/year) the change was implemented.

ATTACHMENT 4

MARKED UP CURRENT TECHNICAL SPECIFICATION PAGES

DRESDEN STATION

UNIT 1

(DPR-2)

Copy from book

Appendix A

to

Amended Facility License DPR-2

Technical Specifications and Bases For

Dresden Nuclear Power Station Unit 1

Grundy County, Illinois

Commonwealth Edison Company

Docket No. 50-10

Date: September 3, 1993

This page replaced
by new page i
with DEFINITIONS per
TSUP page order.

TABLE OF CONTENTS

PAGE

1.0 Definitions 1-1

1.1 Safety Limits - Deleted

1.2 Safety Limits - Deleted

2.1 LSSS - Deleted

2.2 LSSS - Deleted

3.0 LIMITING CONDITION FOR REQUIRED EQUIPMENT

Sections 3.1 through 3.7 - deleted

3.8 Radioactive Materials 3/4.8-1

~~3.8 A. Airborne Effluents 3/4.8-1 DELETED~~

~~3.8 B. Liquid Effluents 3/4.8-2 DELETED~~

3.8 C. Deleted

3.8 D. Radioactive Waste Storage 3/4.8-3

~~3.8 E. Radioactive Effluent Monitoring Availability 3/4.8-3 DELETED~~

3.8 F. Deleted

3.8 G. Miscellaneous Radioactive Waste Sources 3/4.8-4

~~3.8 H. General 3/4.8-3 DELETED~~

3.9 Auxiliary Electric Systems - Deleted

3.10 Fuel Handling and Storage 3/4.10-1

3.10.A. and 3.10.B - Deleted

3.10 C. Fuel Storage Pool Water Level 3/4.10-1

3.10 D. Deleted

3.10 E. Nuclear Fuel 3/4.10-1

3.11 High Energy Piping Integrity - Deleted

3.12 Fire Protection Systems 3/4.12-1

Sections 3.12.A through 3.12.H - Deleted per Generic Letters 86-10
and 88-12 (Amendment 101)

This page replaced
with new page ii
per TSUP page
order

SURVEILLANCE REQUIREMENT

TABLE OF CONTENTS (Cont'd)

PAGE

Sections 4.1 through 4.7 - Deleted

4.8	Radioactive Materials	3/4.8-1	
4.8	A. Airborne Effluents.	3/4.8-1	DELETED
4.8	B. Liquid Effluents.	3/4.8-2	DELETED
4.8	C. Deleted		
4.8	D. Radioactive Waste Storage.	3/4.8-3	
4.8	E. Radioactive Effluent Monitoring Availability.	3/4.8-3	DELETED
4.8	F. Deleted		
4.8	G. Miscellaneous Radioactive Materials Sources	3/4.8-4	
4.8	H. General	3/4.8-5	DELETED
4.9	Auxiliary Electrical Systems - Deleted		
4.10	Fuel Handling and Storage	3/4.10-1	
4.10	A. through 4.10.B. Deleted		
4.10	C. Fuel Storage Pool Water Level	3/4.10-1	
4.10	D. Deleted		
4.10	E. Nuclear Fuel	3/4.10-1	
4.11	High Energy Piping Integrity - Deleted		
4.12	Fire Protection Systems - Deleted		

5.0	Design Features.	5-1
-----	--------------------------	-----

5.1	Site	5-1
-----	----------------	-----

Sections 5.2 - 5.4 Deleted

5.5	Fuel Storage	5-1
-----	------------------------	-----

5.6 Seismic Design - Deleted

Revised on new page v
per TSUP page order

New page iii and iv
per TSUP page order

ADMINISTRATIVE CONTROLS

TABLE OF CONTENTS (Cont'd)

PAGE

6.0	Administrative Controls	6-1
6.1	Organization	6-1
6.2	Plant Operating Procedures	6-11
6.3	Action To Be Taken in the Event of a Reportable Event in Plant Operation	6-13
6.5	Plant Operating Record	6-13
6.6	Reporting Requirements	6-14

*Replaced with new pages vi and vii
per TSUP page order*

LIST OF TABLES

Page

Table 6.6.1	Minimum Shift Manning Chart	6-4
Table 6.6.1	Special Reports	6-22

LIST OF FIGURES

None

DELETED

1.0 Definitions

The succeeding frequently used terms are explicitly defined so that a uniform interpretation of the specifications may be achieved.

REVIEWED
to TSUP

- 8-4
- A. Immediate - Immediate means that the required action will be initiated as soon as practicable considering the safe operation of the unit and the importance of the required action.
 - B. Instrument Calibration - An instrument calibration means the adjustment of an instrument signal output so that it corresponds, within acceptable range, and accuracy, to a known value(s) of the parameter which the instrument monitors. Calibration shall encompass the entire instrument including actuation, alarm, or trip.
 - C. Instrument Functional Test - An instrument functional test means the injection of a simulated signal into the instrument primary sensor to verify the proper instrument response, alarm, and/or initiating action. The primary sensors of radiation monitors are excepted from this definition. For these monitors the functional test will consist of injecting a simulated electrical signal into the measurement channel.
 - D. Instrument Check - An instrument check is qualitative determination of acceptable operability by observation of instrument behavior during operation. This determination shall include, where possible, comparison of the instrument with other independent instruments measuring the same variable.
 - E. Operable - A system, subsystem, train, component, or device shall be operable when it is capable of performing its specified function(s). Implicit in this definition shall be the assumption that all necessary attendant instrumentation, controls, normal and emergency electrical power sources, cooling or seal water, lubrication or other auxiliary equipment that are required for the system, subsystem, train, component or device to perform its function(s) are also capable of performing their related support function(s).
 - F. Operating - Operating means that a system, subsystem, train, component or device is performing its intended functions in its required manner.
 - G. Surveillance Interval - Each surveillance requirement shall be performed within the specified surveillance interval with:
 - a. A maximum allowable extension not to exceed 25% of the surveillance interval.
 - b. A total maximum combined interval time for any 3 consecutive intervals not to exceed 3.25 times the specified surveillance interval.
- Spec 6.6.2 ?

DELETED

- 46
- H. Offsite Dose Calculation Manual (ODCM) - Contains the methodology and parameters used in the calculations of offsite doses due to radioactive gaseous and liquid effluents, and in the calculation of gaseous and liquid effluent monitor alarm/trip setpoints.
 - I. Process Control Program (PCP) - Contains the sampling, analysis, and formulation determination by which solidification of radioactive wastes from liquid systems is assured.

REPLACED with TSUP definitions

1.1 Safety Limits-Fuel Cladding Integrity

Deleted

2.1 Limiting Safety System Settings -
Fuel Cladding Integrity Deleted

Deleted

1.2 Safety Limits-Reactor Coolant System

Deleted

2.2 Limiting Safety System Settings -
Reactor Coolant System

Deleted

Page DELETED

3.0 LIMITING CONDITION FOR REQUIRED EQUIPMENT

3.1 Reactor Protection System

Deleted

3.2 Protective Instrumentation

Deleted

3.3 Reactivity Control

Deleted

3.4 Standby Liquid Control System

Deleted

3.5 Core and Containment Cooling Systems

Deleted

3.6 Primary System Boundary

Deleted

3.7 Containment Systems

Deleted

4.0 SURVEILLANCE REQUIREMENTS

4.1 Reactor Protection System

Deleted

4.2 Protective Instrumentation

Deleted

4.3 Reactivity Control

Deleted

4.4 Standby Liquid Control System

Deleted

4.5 Core and Containment Cooling Systems

Deleted

4.6 Primary System Boundary

Deleted

4.7 Containment Systems

Deleted

Page DELETED

3.8 Limiting Condition For Required Equipment

3.8 Radioactive Materials

Applicability:

Applies to the radioactive effluents from the plant.

Objective:

To assure that radioactive effluents are kept as low as practicable, and, in any event, are not released to the environment in an uncontrolled manner and to assure that any material released is within the limits of 10 CFR 20.

Specification:

A. Airborne Effluents

1. Radioactive gases released from the Dresden Unit 1 chimney shall be continuously monitored. To accomplish this, the chimney monitoring system shall be operable at all times except as noted in Specification 3.8.E.
2. Airborne effluents from Unit 1 shall be added to those from Units 2 and 3 and be included in the site dose rate as calculated from prescribed samples and following methods prescribed in the approved Dresden ODCM.

4.8 Surveillance Requirement

4.8 Radioactive Materials

Applicability:

Applies to the periodic monitoring and recording of radioactive effluents.

Objective:

To ascertain that radioactive releases are kept as low as practicable and are within allowable values.

Specification:

A. Airborne Effluents

1. The main chimney monitoring system shall have a daily instrument check, monthly source check, quarterly function test and once per 18 month calibration.
2. Main Chimney activity analysis shall be performed at the specified frequencies.
 - a. Main chimney noble 1/month gas (tritium and principal gamma emitters).
 - b. Main chimney parti- 1/month* culate (principal gamma emitters).
 - c. Main chimney 1/month* iodine.
 - d. Main chimney parti- 1/qtr. culate composite (Sr-89, Sr-90, gross alpha).

Note * Analysis frequency shall be increased to 1/week if release rates exceed 1% of any applicable limit referenced in Section 3.8.A.2.

Removed to ODCM
Page DELETED

3/4.8-1

3.8 Limiting Condition For Required
Equipment (Cont'd)

4.8 Surveillance Requirement (Cont'd)

B. Liquid Effluents

1. Radioactive effluents shall not be released from Unit 1 storage tanks directly to the environment (release can be made through D2/3 Radwaste System). Radioactive effluents may be released from Units 2 and 3 by way of the Unit 1 discharge canal only when discharges are controlled on a radionuclide basis in accordance with Appendix B, Table II, Column 2 of 10 CFR 20 and all applicable limits listed in DPR-19 and DPR-25. Additionally, the discharge canal sampler shall be operable at any time a radioactive discharge is occurring via this pathway or the radioactive discharge shall be immediately suspended.
2. The service water discharge shall be continuously monitored and the concentration (above background) in the condenser cooling water discharge canal shall not exceed the limits stated below unless the discharge is controlled on a radionuclide basis in accordance with Appendix B, Table II, Column 2 of 10 CFR 20 and Note 1 thereto:

Maximum Concentration

1×10^{-7} $\mu\text{Ci/ml}$

C. Deleted

B. Liquid Effluents

1. a. The service water radiation monitor shall have an instrument check performed daily, a functional check performed quarterly, and a source check and calibration performed once every 18 months.
 - b. The operability of the discharge canal sampler shall be verified prior to performing and once a day during planned discharge.
 - c. Station records of batch releases from Units 2 and 3 shall be maintained in accordance with the specifications of DPR-19 and DPR-25.
2. a. Activity analysis of continuous service water discharge shall be performed monthly for I-131, principal gamma emitters dissolved and entrained gases, H-3, and gross alpha activity. Additional analysis for Sr-89, Sr-90 and Fe-55 shall be performed quarterly.
 - b. In the event of failure of the service water monitor, effluents may continue to be released via this pathway if a service water grab sample is taken once every 24 hours and analyzed.

C. Deleted

REMOVED TO
DDCM
Page deleted

D. Radioactive Waste Storage

The maximum amount of radioactivity in liquid storage in all Dresden Stations above grade tanks shall not exceed 90 curies. If these conditions cannot be met the stored liquid shall be recycled within 24 hours to below grade tanks. All tanks located within the seismic portion of the Chemical Cleaning Building are not considered above grade storage.

D. Radioactive Waste Storage

A sample from each of the above-grade liquid waste tanks shall be taken, analyzed, and recorded every 72 hours. If no additions to a tank have been made since the last sample, the tank need not be sampled until the next addition.

Renumbered 3/4.B.1 per TSUP

E. Radioactive Effluent Monitoring Availability

1. The entire main chimney monitoring system, including the particulate filters and charcoal cartridges, may be out of service for calibration or maintenance provided that the requirements listed in 4.8.E. are satisfied.

REMOVED TO ODCM

E. Radioactive Effluent Monitoring Availability

1. a. The main chimney noble gas monitor may be out-of-service for calibration and maintenance provided that a noble gas grab sample is taken daily and analyzed.
- b. The main chimney particulate and iodine sampling system may be out-of-service for maintenance provided that particulate and iodine samples shall be collected using alternate filter holders and pumps connected to the main chimney sample stream.

F. Deleted

F. Deleted

C. Miscellaneous Radioactive Materials Sources

Source Leakage Test

Specification

Each sealed source containing radioactive material in excess of 100 microcuries of beta and/or gamma emitting material or 5 microcuries of alpha emitting material shall be free of ≥ 0.005 microcuries of removable contamination.

Each sealed source with removable contamination in excess of the above limit shall be immediately withdrawn from use and either decontaminated and repaired or disposed of in accordance with Commission regulations.

A complete inventory of radioactive materials in the licensee's possession shall be maintained current at all times.

REVISED to TSUP
approved wording

G. Miscellaneous Radioactive Materials Sources

Each sealed source shall be tested for leakage and/or contamination by the licensee or by other persons specifically authorized by the Commission or an Agreement State. The test method shall have a detection sensitivity of at least 0.005 microcuries per test sample.

Each category of sealed sources shall be tested at the frequency described below.

1. Sources in use (excluding startup sources previously subjected to core flux) - At least once per six months for all sealed sources containing radioactive material:
 - a. With a half-life greater than 30 days (excluding Hydrogen 3), and
 - b. In any form other than gas.
2. Stored sources not in use - Each sealed source shall be tested prior to use or transfer to another licensee unless tested within the previous six months. Sealed sources transferred without a certificate indicating the last test date shall be tested prior to being placed into use.

A Special Report shall be prepared and submitted to the Commission pursuant to Specification 6.6.C.3 if source leakage tests reveal the presence of ≥ 0.005 microcuries of removable contamination.

3.8 Limiting Condition For Required
Equipment (Cont'd)

E. General

It is expected that releases of radioactive material in effluents will be kept at small fractions of the limits specified in Section 20.106 of 10 CFR Part 20. The licensee will exert his best efforts to keep levels of radioactive material in effluents as low as is reasonably achievable.

REMOVED TO ODCM

4.8 Surveillance Requirement (Cont'd)

H. General

1. Operating procedures shall be developed and used, and equipment which has been installed to maintain control over radioactive materials in gaseous and liquid effluents produced during normal activity shall be maintained and used, to keep levels of radioactive material in effluents released to unrestricted areas as low as is reasonably achievable. The environmental monitoring program given in the ODCM shall be conducted.

BASES

- A. Airborne Effluents - The basis for airborne effluents from the site are contained in the Off-Site Dose Calculation Manual.
- B. Liquid Effluents - Liquid effluent release rate will be controlled in terms of the concentration in the discharge canal. In the case of unidentified mixtures, such concentration limit is based on assumption that the entire content is made up of the most restrictive isotope in accordance with 10 CFR 20. Such a limit assures that even if a person obtained all of his daily water intake from such a source, the resultant dose would not exceed that specified in 10 CFR 20. Since no such use of the discharge canal is made and considerable natural dilution occurs prior to any location where such doses could occur, this assures that off-site doses from this source will be far less than the limits specified in 10 CFR 20.

C. Deleted

REMOVED to ODCM

- D. Radioactive Liquid Waste Storage - The maximum gross radioactivity in liquid storage in the specified tanks has been limited on the basis of an accidental spill from all stated tanks due to a seismic event great enough to damage them. The Chemical Cleaning Building is seismically designed and designed to contain a simultaneous spill from all the contaminated liquid storage tanks housed within. Assuming a low river flow of 3100 ft³/sec, a day period over which the radioactive liquid wastes are diluted in the river, and consumption of the water by individuals at standard man consumption rate (3000 ml/day), the single intake by an individual would not exceed one-third the yearly intake allowable by 10 CFR 20 for unidentified radioisotopes (1×10^{-7} μ Ci/ml). The factor of 3 was applied to 10 CFR 20 limits as recommended for situations in which population groups could be exposed.

The sampling frequency has been established so that if the maximum amount of gross radioactivity is exceeded, action can be taken to reduce the radioactivity to a level below the specified limit.

- E. Radioactive Effluent Monitoring Availability

MOVED to 3/4.B.J

F. Deleted

- G. Miscellaneous Radioactive Materials Sources

The objective of this specification is to assure that leakage from byproduct, source and special nuclear material sources does not exceed allowable limits. The limitations on removable contamination for sources requiring leak testing, including alpha emitters, is based on 10 CFR 70.39(c) limits for plutonium.

- H. Environmental Radiological Monitoring Program - The bases for the environmental monitoring program are contained in the ODCM.

DELETED

3.9 Limiting Condition For Required Equipment

4.9 Surveillance Requirement

.9 Auxiliary Electrical Systems

4.9 Auxiliary Electrical Systems

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Deleted

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3/4.9-1

+4144

BASES

Deleted

Page deleted

B.3/4.9-2

WP-6144

3.10 Limiting Condition For Required Equipment

Fuel Handling and Storage

Applicability

Applies to fuel handling and fuel storage.

Objective

To prohibit fuel from being loaded into the reactor core and ensure adequate fuel pool water level and quality.

Specification

A. and B. - Deleted

C. Fuel Storage Pool Water Level

Whenever irradiated fuel is stored in the fuel storage pool, the pool water level shall be maintained at a level of at least 18 feet.

D. DELETED

E. Nuclear Fuel shall not be loaded into the reactor core.

F. Fuel Storage Pool Water Quality

Once initial fuel pool cleanup is completed:

1. $Cl \leq 0.5$ ppm
2. Conductivity ≤ 10.0 $\mu mho/cm$ @25°C
3. pH 5.3 to 8.6

If any of the above limits are exceeded, prepare and submit to the commission within 30 days, a Special Report which identifies the cause(s) for exceeding the limit(s) and defines the corrective actions to be taken to ensure that future water quality is in compliance with specification 3.10.F. This is in lieu of a Licensee Event Report.

4.10 Surveillance Requirement

Fuel Handling and Storage

Applicability

Applies to the recording of the fuel pool water level and water quality parameters.

Objective

To verify the fuel pool water level is maintained as specified in 3.10.C and water quality parameters as specified in 3.10.F.

Specification

A. and B. - Deleted

C. Fuel Storage Pool Water Level

Whenever irradiated fuel is stored in the fuel storage pool, the pool water level shall be recorded daily.

D. DELETED

F. Fuel Storage Pool Water

1. Sample and analyze monthly.

This requirement moved to section 5 DESIGN FEATURES to be consistent with TSUP

Remainder of page revised into TSUP format. All specifications and surveillances maintained

BASES

Revised into TSUP format and placed into B.3/4.10

C. Fuel Storage Pool Water Level -

To assure that there is adequate water to shield and cool the irradiated fuel assemblies stored in the pool, a minimum pool water level is established. The minimum water level of 18 feet is established because it would be a significant change from the normal level, well above a level to assure adequate cooling (just above active fuel) and above the level at which the GSEP action is initiated (5' uncontrolled loss of level with level decreasing).

E. Reactor Core

Rewritten and included in DESIGN FEATURES Section 5 to be consistent with TSUP format

To assure that a critical assembly of nuclear fuel is no longer possible in the reactor core, the placement of nuclear fuel into the reactor core is specifically prohibited.

F. Fuel Storage Pool Water Quality

In December 1983, the Unit 1 Fuel Pool Water cooling and Clean-up System was taken out of service because of operational problems. This did not adversely affect the fuel shielding or cooling since the Pool Water level was maintained and the latest discharged fuel had been in the pool for greater than five years. However, four years of stagnation led to the growth of micro-organisms and the concern for microbial influenced corrosion (MIC) of pool structures. A Pool Water Treatment Program was initiated in December of 1987 which includes hydrogen peroxide addition, vacuuming, and filtration. This clean-up effort will continue until the desired cleanliness level has been reached and a Demineralization System can be put in-service to maintain water quality.

Revised into TSUP format and placed in B.3/4.10

3.11 Limiting Conditions for Operation

High Energy Piping Integrity

Deleted

4.11 Surveillance Requirements

High Energy Piping Integrity

Deleted

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5.0 Design Features

5.1 Site

Dresden Unit 1 is located at the Dresden Nuclear Power Station which consists of a tract of land of approximately 953 acres located in the Northwest quarter of the Morris 15-minute quadrangle (as designated by the U.S. Geological Survey), Goose Lake Township, Grundy County, Illinois. The tract is situated in portions of Sections 25, 26, 27, 34, 35, and 36 of Township 34 North, Range 8 East of the Third Principal Meridian.

5.2 - 5.4 - DELETED

5.5 Fuel Storage

The K_{eff} of the spent fuel storage pool shall be less than or equal to 0.90.

5.6 SEISMIC DESIGN - DELETED

Reformatted page to TSUP style.

Added: 5.1.B (deleted)

5.1.C Radioactive Gaseous
Effluents

5.1.D Radioactive Liquid
Effluents

5.2 (deleted)

5.4 (deleted)

Information from 3/4.10 and B3/4.10
added to this page as 5.3

Changed 5.5 to 5.6 to be consistent
with TSUP

Section 5.5 left intentionally blank

6.0 ADMINISTRATIVE CONTROLS

6.1 Organization

Moved to 6.2.A

A. Onsite and offsite organizations shall be established for the unit operation and corporate management, respectively. The onsite and offsite organizations shall include the positions for activities affecting the safety of the nuclear power plant.

1. Lines of authority, responsibility, and communication shall be established and defined for the highest management levels through the intermediate levels to and including all operating organization positions. These relationships shall be documented and updated, as appropriate, in the form of organization charts, functional descriptions of department responsibilities and relationships, and job descriptions for key personnel positions, or in the equivalent forms of documentation. The requirements shall be documented in the Quality Assurance Manual.
2. The Station Manager shall be responsible for overall unit safe operation and shall have control over those onsite activities necessary for safe operation and maintenance of plant.
3. The Chief Nuclear Officer (CNO) shall have the corporate responsibility for overall plant nuclear safety and shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the plant to ensure nuclear safety.
4. The individuals who train the operating staff and those who carry out health physics and quality assurance functions may report to the appropriate onsite manager; however, they shall have sufficient organizational freedom to ensure their independence from operational pressures.

B. Deleted

- C. The shift manning for the station shall be as shown in Table 6.1.1. The Operations Manager or Shift Operations Supervisor, Shift Managers, Unit Supervisors, and Field Supervisors shall have a Senior Operating License. The Fuel Handling Supervisors shall have a limited Senior Operating License. The Site Vice President on the corporate level has responsibility for the Fire Protection Program. An Operations Manager at the station will be responsible for implementation of the Fire Protection Program.

*Deleted - replaced by description in 6.2.B UNIT STAFF,
Fire protection covered by 6.1.B*

Added new section 6.1 RESPONSIBILITY

6.0 ADMINISTRATIVE CONTROLS (Cont'd.)

*COVERED IN 6.3 UNIT STAFF
QUALIFICATIONS*

- D. Qualifications of the station management and operating staff shall meet minimum acceptable levels as described in ANSI N18.1, "Selection and Training of Nuclear Power Plant Personnel," dated March 8, 1971, with the exception of the Radiation Protection Manager who shall meet or exceed the qualifications of Radiation Protection Manager of Regulatory Guide 1.8, September 1975, and the Shift Technical Advisor who shall have a bachelor's degree or equivalent in a scientific or engineering discipline with specific training in plant design and response and analysis of the plant for transients and accidents. The individual filling the position of Site Engineering Manager shall meet the minimum acceptable level for "Technical Manager" as described in 4.2.4 of ANSI N18.1 - 1971.

- E. Retraining and replacement training of Station personnel shall be in accordance with ANSI N18.1, "Selection and Training of Nuclear Power Plant Personnel," dated March 8, 1971.

A training program for the fire brigade shall be maintained under the direction of an Operations Manager and shall meet or exceed the requirements of Section 27 of the NFPA Code - 1975, except for fire brigade training sessions which shall be held at least quarterly.

- F. Retraining shall be conducted at intervals not exceeding two years.

- G. Deleted.

COVERED IN 6.4 TRAINING

TABLE 6.1.1
MINIMUM SHIFT MANNING CHART (1)

UNITS WITH FUEL	CONDITION OF			NUMBER OF MEN IN EACH POSITION				
	FIRST UNIT	SECOND UNIT	THIRD UNIT	SRO ⁽¹⁾	RO ⁽²⁾	STA	NON- LIC	RAD MEN
ONE	Cold Shutdown	Cold Shutdown	Cold Shutdown	1	1	0	5	1
	Cold Shutdown	Cold Shutdown	Above Cold Shutdown	2	2	1	5	1
TWO	Cold Shutdown	Cold Shutdown	Cold Shutdown	1	2	0	5	1
	Cold Shutdown	Cold Shutdown	Above Cold Shutdown	2	3	1	5	1
	Cold Shutdown	Above Cold Shutdown	Above Cold Shutdown	2	3	1	5	1

SRO Senior Reactor Operator. At least one SRO must remain in the Control Room at all times when one or more units is above cold shutdown. This person may, however leave the Control Room for periods not to exceed 10 minutes, provided another SRO acts as relief operator.

RO Reactor Operator (For each reactor containing fuel, one RO will be in the Control Room at all times.)

STA Shift Technical Advisor.

NON-LIC Equipment Operators and Equipment Attendants.

RAD MEN Radiation Protection Men.

- NOTES: (1) Shift crew composition may be less than the minimum requirements for a period of time not to exceed 2 hours in order to accommodate unexpected absence of on-duty shift crew members provided immediate action is taken to restore the shift crew composition to within the minimum requirements.
- (2) Does not include the licensed Senior Reactor Operator or Senior Reactor Operator limited to fuel handling, supervising alteration of the reactor core.
- (3) Shall not operate units on which they are not licensed.

ADDITIONAL REQUIREMENTS

- SRO can be RO at controls.
- SRO in Control Room cannot provide relief to SRO/RO at controls.
- SRO in Control Room must be in sight of or audible range of operator at all times or be in audible range of annunciators.

Deleted - Covered in 6.2.B UNIT STAFF
in narrative.

6.0 ADMINISTRATIVE CONTROLS (Cont'd.)

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(Pages 6-6 thru 6-12 not used)

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6.0 ADMINISTRATIVE CONTROLS (Cont'd.)

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6.0 ADMINISTRATIVE CONTROLS (Cont'd.)

6.2 Plant Operating Procedures

- A. Detailed written procedures including applicable checkoff lists covering items listed below shall be prepared, approved, and adhered to:
1. Systems and components involving nuclear safety of the facility.
 2. Deleted.
 3. Actions to be taken to correct specific and foreseen potential malfunctions of systems or components including responses to alarms.
 4. Emergency conditions involving potential or actual release of radioactivity - "Generating Stations Emergency Plan" and station emergency and abnormal procedures.
 5. Instrumentation operation which could have an effect on the safety of the facility.
 6. Preventive and corrective maintenance operations which could have an effect on the safety of the facility.
 7. Surveillance and testing requirements.

*Replaced in proposed revision
section 6.8. A under PROCEDURES
AND PROGRAMS*

6.0 ADMINISTRATIVE CONTROLS (Cont'd.)

8. Tests and experiments.
9. Deleted
10. Station Security Plan and implementing procedures.
11. Fire Protection Program implementation.
12. ODCM implementation.
13. PCP implementation.

*Replaced by proposed
Section 6.8.A*

14. Working hours of the Shift Manager, Unit Supervisor, Field Supervisor, and Nuclear Station Operator job classifications such that the heavy use of overtime is not routinely required.

- B. Radiation control procedures shall be maintained, made available to all station personnel and adhered to. These procedures shall show permissible radiation exposure and shall be consistent with the requirements of 10 CFR 20. This radiation protection program shall be organized to meet the requirements of 10 CFR 20.

Replaced by proposed Section 6.11

- C. 1. Procedures for items identified in Specification 6.2.A and any changes to such procedures shall be reviewed and approved by an Operations Manager and the Technical Superintendent in the areas of operation, fuel handling, or instrument maintenance, and by the Maintenance Superintendent and Technical Superintendent in the areas of plant maintenance and plant inspection. Procedures for items identified in Specification 6.2.B and any changes to such procedures shall be reviewed and approved by the Radiation Protection Manager. At least one person approving each of the above procedures shall hold a valid senior reactor operator's license. In addition, these procedures and changes thereto must have authorization by the Station Manager (or designee) before being implemented.
2. Work and instruction type procedures which implement approved maintenance or modification procedures shall be approved and authorized by the Maintenance Superintendent where the written authority has been provided by an Operations Manager. The "Maintenance/Modification Procedure" utilized for safety related work shall be so approved only if procedures referenced in the "Maintenance/Modification Procedure" have been approved as

Replaced by proposed section 6.8.A.

6.0 ADMINISTRATIVE CONTROLS (Cont'd.)

required by 6.2.A. Procedures which do not fall within the requirements of 6.2.A or 6.2.B may be approved by the Department Heads.

D. Temporary changes to procedures 6.2.A and 6.2.B above may be made provided:

1. The intent of the original procedure is not altered. **DELETED**
2. The change is approved by two members of the plant management staff, at least one of whom holds a Senior Reactor Operator's License for Units 2 and 3.
3. The change is documented, reviewed by the Onsite Review and Investigative Function and approved by the Station Manager (or designee) within 14 days of implementation.

E. Drills of the emergency procedures described in Specification 6.2.A.4 shall be conducted at the frequency specified in the Generating Station Emergency Plan. These drills will be planned so that during the course of the year, communication links are tested and outside agencies are contacted.

DELETED - Replaced by proposed section 6.2.A.4

6.3 Action to be Taken in the Event of a REPORTABLE EVENT in Plant Operation

Any reportable event shall be promptly reported to the Site Vice President or his designated alternate. The incident shall be promptly reviewed by the Onsite Review and Investigative Function and a separate report for each reportable event shall be prepared in accordance with the requirements of Specification 6.6.B.

DELETED

6.4 Deleted.

6.5 Plant Operating Records

- A. Records and/or logs relative in the following items shall be kept in a manner convenient for review and shall be retained for at least five years.

DELETED as TS improvement item

6.0 ADMINISTRATIVE CONTROLS (Cont'd.)

1. Deleted.
 2. Records of standby operations and principal maintenance activities, including inspection and repair, regarding principal items of equipment pertaining to nuclear safety.
 3. Records and reports of reportable and safety limit events.
 4. Records and periodic checks, inspection and/or calibrations performed to verify the Surveillance Requirements (See Section 4 of these Specifications) are being met. All equipment failing to meet surveillance requirements and the corrective action taken shall be recorded.
 5. Records of changes made to the equipment or reviews of tests and experiments to comply with 10 CFR 50.59.
 6. Records of radioactive shipments.
 7. Records of tests pertaining to nuclear safety.
 8. Records of changes to operating procedures
 9. Shift Managers Logs . .
 10. By-product material inventory records and source leak test results.
- B. Records and/or logs relative to the following items shall be recorded in a manner convenient for review and shall be retained for the life of the plant.
1. Substitution or replacement of principal items of equipment pertaining to nuclear safety.
 2. Changes made to the plant as it is described in the Safety Analysis Report.
 3. Records of spent fuel inventory and assembly histories.
 4. Deleted.
 5. Updated, corrected, and as-built drawings of the plant.
 6. Records of plant radiation and contamination surveys.
 7. Records of off-site environmental monitoring surveys.

Deleted as TS improvement items

6.0 ADMINISTRATIVE CONTROLS (Cont'd.)

8. Records of radiation exposure for all plant personnel, including all contractors and visitors to the plant in accordance with 10 CFR 20.
9. Records of radioactivity in liquid and gaseous wastes released to the environment.
10. Deleted.
11. Records of individual staff members indicating qualifications, experience, training and retraining.
12. Deleted.
13. Minutes of meetings and results of reviews performed by the Offsite and Onsite Review and Investigative Functions.
14. Deleted. *Deleted as TS improvement item*

6.6 REPORTING REQUIREMENTS

In addition to the applicable reporting requirements of Title 10, Code of Federal Regulations, the following identified reports shall be submitted to the Regional Administrator of the appropriate Regional Office of the NRC unless otherwise noted.

A. Routine Reports

1. Deleted.
2. A tabulation shall be submitted on an annual basis of the number of station, utility and other personnel (including contractors) receiving exposures greater than 100 mrem/yr and their associated man rem exposure according to work and job functions (See Note); e.g., reactor operations and surveillance, inservice inspection, routine maintenance, special maintenance (describe maintenance), waste processing, and refueling. The dose assignment to various duty functions may be estimated based on pocket dosimeter, TLD, or film badge measurements. Small exposures totalling less than 20% of the individual total dose need not be accounted for. In the aggregate, at least 80% of the total whole body dose received from external sources shall be assigned to specific major work functions.
3. Deleted. *Replaced by proposed section 6.9.A.2.a*

Note: This tabulation supplements the requirements of 20.407 of 10 CFR Part 20.

6.0 ADMINISTRATIVE CONTROLS (Cont'd.)

B. Reportable Events

Replaced in proposed DEFINITIONS

Reportable events will be submitted as required by 10 CFR 50.73.

C. Unique Reporting Requirements

1. Radioactive Effluent Release Report (Annual)

*Replaced by
proposed
Section
6.9.A.4
and ODCM*

A report shall be submitted to the Commission within 60 days after January 1 of each year specifying the quantity of each of the principal radionuclides released to unrestricted areas in liquid and gaseous effluents during the previous 12 months. The format and content of the report shall be in accordance with Regulatory Guide 1.21 (Revision 1) dated June 1974. Any changes to the PCP shall be included in this report.

2. Environmental Radioactivity Data (Annual Report)

a. Standard Radiological Monitoring Program

(1) Non-Routine Report

- (a) If a confirmed measured radionuclide concentration in an environmental sampling medium averaged over any calendar quarter sampling period exceeds the reporting level given in Table 4.8-1 and if the radioactivity is attributable to plant operation, a written report shall be submitted to the Regional Administrator of the NRC Regional Office, with a copy to the Director, Office of Nuclear Reactor Regulation, within 30 days from the end of the quarter. When more than one of the radionuclides in Table 4.8-1 are detected in the medium, the reporting level shall have been exceeded if

$$I(C_i/(RL)_i) \text{ is equal to or greater than } 1$$

where C is the concentration of the i^{th} radionuclide in the medium and RL is the reporting level of radionuclide i .

- (b) If radionuclides other than those in Table 4.8-1 are detected and are due to plant effluents, a reporting level is exceeded if the potential annual dose to an individual is equal to or greater than the design objective doses of 10 CFR 50, Appendix I.

Removed and placed in ODCM

*Removed and
placed in ODCM*

- (c) This report shall include an evaluation of any release conditions, environmental factors, or other aspects necessary to explain the anomalous effect.

(2) Annual Operating Report

An annual report containing the data taken in the standard radiological monitoring program (Table 4.8-1) shall be submitted by March 31 of the next year. The content of the report shall include:

- (a) Results of environmental sampling summarized on a quarterly basis following the format of Regulatory Guide 4.8 Table 1 (December 1975); (individual sample results will be retained at the station);

In the event that some results are not available for inclusion with the report, the report shall be submitted noting and explaining the reasons for the missing results. Summaries, interpretations, and analysis of trends of the results are to be provided.

- (b) An assessment of the monitoring results and radiation dose via the principal pathways of exposure resulting from plant emissions of radioactivity including the maximum noble gas gamma and beta air doses in the unrestricted area. The assessment of radiation doses shall be performed in accordance with the ODCM.
- (c) Results of the census to determine the locations of animals producing milk for human consumption, and the pasture season feeding practices at dairies in the monitoring program.
- (d) The reason for the omission if the nearest dairy to the station is not in the monitoring program. (Table 4.8-5)
- (e) An annual summary of meteorological conditions concurrent with the releases of gaseous effluents in the form of joint frequency distributions of wind speed, wind direction, and atmospheric stability.

*Replaced by proposed section 6.9.A.3
and ODCM*

6.0 ADMINISTRATIVE CONTROLS (Cont'd.)

*Replaced by
proposed
section
6.9.A.3
and ODCM*

- (f) The results of the interlaboratory comparison program described in Section 3.8.E.7.
- (g) The results of the 40 CFR 190 uranium fuel cycle dose analysis for each calendar year
- (h) A summary of the monitoring program, including maps showing sampling locations and tables giving distance and direction of sampling locations from the station.

3. Special Reports *Replaced by proposed section 6.9.B*
Special reports shall be submitted as indicated in Table 6.6.1.

6.7 Deleted.

6.8 Offsite Dose Calculation Manual (ODCM)

- A. The ODCM shall describe the methodology and parameters to be used in the calculation of offsite doses due to radioactive gaseous and liquid effluents and in the calculation of gaseous and liquid effluent monitoring instrumentation alarm/trip setpoints consistent with the applicable LCO's contained in these Technical Specifications. Methodologies and calculational

Replaced by proposed section 6.14.A.3

TABLE 6.6.1

SPECIAL REPORTS

<u>AREA</u>	<u>SPECIFICATION REFERENCE</u>	<u>SUBMITTAL DATE</u>
a. Radioactive Source Leak Testing (1)	3.8.F	Annual Report

NOTES:

1. The report is required only if the tests reveal the presence of 0.005 microcuries or more of removable contamination.

Replaced by proposed section 6.9.B

Table DELETED

6.0 ADMINISTRATIVE CONTROLS (Cont'd.)

Replaced by proposed section 6.14.A.3
procedures acceptable to the Commission are contained in NUREG-0133.

The ODCM shall be submitted to the Commission at the time of proposed Radiological Effluent Technical Specifications and shall be subject to review and approval by the Commission prior to implementation.

B. Licensee initiated changes to the ODCM may be made provided the change:

1. Shall be submitted to the Commission by inclusion in the Monthly Operating Report within 90 days of the date the change(s) was made effective and shall contain:
 - a. Sufficiently detailed information to support the change. Information submitted should consist of a package of those pages of the ODCM to be changed together with appropriate analyses or evaluations justifying the change(s);
 - b. A determination that the change will not reduce the accuracy or reliability of dose calculations or setpoint determinations; and
 - c. Documentation of the fact that the change has been reviewed and found acceptable by the Onsite Review and Investigative Function.
2. *Replaced by proposed section 6.14.A.1 and 2*
Shall become effective upon review and acceptance by the Onsite Review and Investigative Function.

6.9 Process Control Program (PCP)

- A. The PCP shall contain the sampling, analysis, and formulation determination by which solidification of radioactive wastes from liquid systems is assured.
- B. The PCP shall be approved by the Commission prior to implementation.
- C. Licensee initiated changes may be made to the PCP provided the change:
 1. Shall be submitted to the Commission in the Radioactive Effluent Release Report for the period in which the change was made and shall contain:

Replaced by proposed section 6.13

6.0 ADMINISTRATIVE CONTROLS (Cont'd.)

- a. Sufficiently detailed information to support the change;
- b. A determination that the change did not reduce the overall conformance of the solidified waste product to existing criteria for solid wastes; and
- c. Documentation that the change has been reviewed and found acceptable by the Onsite Review and Investigative Function.

- Replaced by proposed Section 6.13*
2. Shall become effective upon review and acceptance by the Onsite Review and Investigative Function.

6.10 Major Changes to Radioactive Waste Treatment Systems (Liquid, Gaseous, Solid)
(See note below)

A. Licensee initiated major changes to the radioactive waste systems may be made provided:

1. The change is reported in the Monthly Operating Report for the period in which the evaluation was reviewed by the Onsite Review and Investigative Function. The discussion of each change shall contain:
 - a. A summary of the evaluation that led to the determination that the change could be made in accordance with 10 CFR 50.59;
 - b. Sufficient detailed information to support the reason for the change;
 - c. A detailed description of the equipment, components, and process involved and the interfaces with other plant systems;
 - d. An evaluation of the change which shows the predicted releases of radioactive materials in liquid and gaseous effluents and/or quantity of solid waste that differ from those previously predicted in the license application and amendments;
 - e. A comparison of the predicted releases of radioactive materials in liquid and gaseous effluent and in solid waste to the actual releases for the period in which the changes were made;
 - f. An estimate of the exposure to plant operating personnel as a result of the change; and

Relocated to ODCM

Note: Licensee may choose to submit this information as part of the annual FSAR update.

6.0 ADMINISTRATIVE CONTROLS (Cont'd.)

- g. Documentation of the fact that the change was reviewed and found acceptable by the Onsite Review and Investigative Function.
2. The change shall become effective upon review and acceptance by the Onsite Review and Investigative Function.

Relocated to ODCM

ATTACHMENT 5

EVALUATIONS

NO SIGNIFICANT HAZARDS

ENVIRONMENTAL IMPACT ASSESSMENT

IRREVERSIBLE CONSEQUENCES

ATTACHMENT 5

EVALUATION OF SIGNIFICANT HAZARDS CONSIDERATION

Commonwealth Edison has evaluated this proposed amendment and determined that it involves no significant hazards consideration. According to 10 CFR 50.92(c), a proposed amendment to an operating license involves no significant hazards consideration if operation of the facility, in accordance with the proposed amendment would not:

- 1) Involve a significant increase in the probability or consequences of an accident previously evaluated; or
- 2) Create the possibility of a new or different kind of accident from any accident previously evaluated; or
- 3) Involve a significant reduction in a margin of safety.

The proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated because:

In general the proposed amendment represents the conversion of current requirements to a more generic format, or the addition of requirements which are based on the current safety analysis (Decommissioning Plan). Implementation of these changes will not reduce reliability of equipment assumed to operate in the current safety analysis (Decommissioning Plan), or will provide continued assurance that specified parameters remain within their acceptance limits, and as such, will not significantly increase the probability or consequences of a previously evaluated accident.

Some of the proposed changes represent minor curtailments of the current requirements which are based on generic guidance or previously approved provisions for other stations. The proposed amendment for Dresden Station Unit 1's Technical Specifications in general is based on STS guidelines or NRC accepted changes to other facilities such as Trojan or San Onofre Unit 1. Any deviations from STS requirements do not significantly increase the probability or consequences of any previously evaluated accidents for Dresden Station Unit 1. The proposed amendment is consistent with the current safety analysis (Decommissioning Plan) and has been previously determined to represent sufficient requirements for the assurance and reliability of equipment assumed to operate in the safety analysis (Decommissioning Plan), or provide continued assurance that specified parameters remain within their acceptance limits. As such, these changes will not significantly increase the probability or consequences of a previously evaluated accident.

ATTACHMENT 5

Create the possibility of a new or different kind of accident from any previously evaluated because:

In general, the proposed amendment represents the conversion of current requirements to a more generic format, or the addition of requirements which are based on the current safety analysis (Decommissioning Plan). Others represent minor curtailments of the current requirements which are based on generic guidance or previously approved provisions for other stations. These changes do not involve revisions to the design of the station. Some of the changes may involve revision in the operation of the station; however, these provide additional restrictions which are in accordance with the current safety analysis (Decommissioning Plan).

The proposed amendment for Dresden Station Unit 1's Technical Specifications in general is based on STS guidelines or NRC accepted changes to other facilities such as Trojan or San Onofre Unit 1. The proposed amendment has been reviewed for acceptability at the Dresden Nuclear Power Station considering similarity of system or component design versus the STS of later operating plants. Any deviations from STS requirements do not create the possibility of a new or different kind of accident previously evaluated for Dresden Station, Unit 1. No new modes of operation are introduced by the proposed changes. The proposed changes maintain at least the present level of operability. Therefore, the proposed changes do not create the possibility of a new or different kind of accident from any previously evaluated.

Involve a significant reduction in the margin of safety because:

In general, the proposed amendment represents the conversion of current requirements to a more generic format, or the addition of requirements which are based on the current safety analysis (Decommissioning Plan). Others represent minor curtailments of the current requirements which are based on generic guidance or previously approved provisions for other stations. Some of the later individual items may introduce minor reductions in the margin of safety when compared to the current requirements. However, other individual changes are the adoption of new requirements which will provide significant enhancement of the reliability of human performance assumed in the safety analysis (Decommissioning Plan), or provide enhanced assurance that specified parameters remain within their acceptance limits. These enhancements compensate for the individual minor reductions, such that taken together, the proposed changes will not significantly reduce the margin of safety.

The proposed amendment to Technical Specification Section 6.0 implements present requirements, or the intent of present requirements in accordance with the guidelines set forth in the STS. Any deviations from STS requirements do not significantly reduce the margin of safety for Dresden Station. The proposed changes are intended to improve readability, usability, and the understanding of technical specification requirements while maintaining acceptable levels of safe operation. The proposed changes have been evaluated and found to be acceptable for use at Dresden based on system design, safety analysis requirements and operational performance. Since the proposed changes are based on NRC accepted provisions at other operating plants that are applicable at Dresden and maintain necessary levels of system or component reliability, the proposed changes do not involve a significant reduction in the margin of safety.

ATTACHMENT 5

ENVIRONMENTAL ASSESSMENT

Commonwealth Edison has evaluated the proposed amendment against the criteria for the identification of licensing and regulatory actions requiring environmental assessment in accordance with 10 CFR 51.20. It has been determined that the proposed changes meet the criteria for a categorical exclusion as provided under 10 CFR 51.22 (c)(9). This conclusion has been determined because the changes requested do not pose significant hazards consideration or do not involve a significant increase in the amounts, and no significant changes in the types, of any effluent that may be released offsite. Additionally, this request does not involve a significant increase in individual or cumulative occupational radiation exposure. Therefore, the Environmental Assessment Statement is not applicable for these changes.

IRREVERSIBLE CONSEQUENCES ASSESSMENT

Commonwealth Edison has evaluated this proposed amendment and determined that it involves no irreversible consequences. According to 10 CFR 50.92(b), the Commission will be particularly sensitive to a license amendment request that involves irreversible consequences (such as one that permits a significant increase in the amount of effluents or radiation emitted by a nuclear power plant). This amendment is primarily administrative in nature and does not involve any change in operation of any equipment that could change the amounts of effluents or radiation emitted or any other type of irreversible effects.

ATTACHMENT 6

INFORMATION ONLY MATRIXES

DRESDEN UNIT 1 VS TROJAN TS

DRESDEN UNIT 1 TS VS ODCM PLACEMENT

MATRIX - CURRENT TS TO ODCM

Location in the OFFSITE DOSE CALCULATION MANUAL which cover current Technical Specifications (Amendment 38).

<u>Technical Specification</u>	<u>ODCM Chapter</u>
3/4.8 "Applicability" & "Objective"	2, various sections
3.8.A.1	10.1.2.1
3.8.A.2	Table 12.4-1 & footnote 6
3.8.B.1	10.2.1.1
3.8.B.2	10.2.3.2.1
3.8.E.1	Table 12.2-3 action 27 & 28
3.8.H	12.3.C liquid, 12.4.C gaseous
4.8.A.1	Table 12.2-4
4.8.A.2	Table 12.4-1 & footnote 6
4.8.B.1.a	Table 12.2-2
4.8.B.1.b	Table 12.2-2
4.8.B.1.c	12.6.1.2.2 (life of plant)
4.8.B.2.a	Table 12.3-2
4.8.B.2.b	Table 12.2-1 action 10
4.8.E.1	Table 12.2-3 actions 27 & 28
4.8.H.1	2.1.1.2 and 2.1.1.3
B.3/4.8.A	Section E9 page E10
B.3/4.8.B	Section E10 page E18
B.3/4.8.H	Throughout ODCM
6.6.C.1	12.6.2.1
6.6.C.2.a.(1).	12.6.2.3 (Table 12.5-2 ref.)
6.6.C.2.a.(2)	12.6.2.2
6.10.A	12.6.4

COMPARISON BETWEEN UNIT 1 AND TROJAN TS

Proposed	Trojan	Notes
None	1.0.	Use and Application - D1 did not use due to TSUP format
1.0.	1.1	Definitions - Trojan used "Actions" and "Certified Fuel Handler" - D1 used Unit 2/3 TSUP
None	1.2	Logical Connectors - Not used at Dresden Unit 1 which uses TSUP format
None	1.3	Completion Times - TSUP format has times under ACTION
None	1.4	Frequency - TSUP has frequency under SURVEILLANCE
2.0.	2.0.	SAFETY LIMITS - same - N/A to decommissioned plants
None	3.0.	LCO Applicability - Dresden Unit 1 written into individual specifications
None	3.1	Defueled Systems
3/4.8.G	N/A	Sealed Sources - Not in Trojan TS
3/4.8.J	5.7.2.6	Liquid Radwaste Storage - Included in Trojan Administrative Controls
3/4.10.A.1	3.1.1	Spent Fuel Pool Water Level -
None	3.1.2	Spent Fuel Pool Boron Concentration - N/A to BWRs
None	3.1.3	Spent Fuel Pool Temperature - N/A to D1 - no cooling necessary due to fuel age
None	3.1.4	Spent Fuel Pool Load Restrictions - N/A to D1 - no previous specification
5.0.	4.0.	DESIGN FEATURES
6.1	TITLE	RESPONSIBILITY
6.1.A	5.1.1	same - Trojan has add'l words similar to QA Manual
6.1.B	N/A	Sta Mngr shall provide U1 support
6.1.C	5.1.2	same - Shift Mngr resp for operational command function
6.2	TITLE	ORGANIZATION
6.2.A	5.2.1	same
6.2.A.1	5.2.1.a	same
6.2.A.2	5.2.1.b	same - Unit 1 Decommissioning Mngr v. Gen Mngr
6.2.A.3	5.2.1.c	same - A Senior Vice President vs VP and CNO
6.2.A.4	5.2.1.d	same - Trojan calls out Certified Fuel Handlers vs generic statement
6.2.B	TITLE	UNIT STAFF
None	5.2.2.a	Crew composition table 5.2.2-1, D-1 uses words in 6.2.A.1 & 2. No manning relaxation
6.2.B.1	5.2.2-1	same - Trojan requires Shift Manager, D-1 Control room operator
6.2.B.2	5.2.2.b	same - non licensed operator for Unit 1
6.2.B.3	5.2.2.c	same - HP on site during fuel handling
6.2.B.4	5.2.2.d	same - Supervision of fuel handling
6.2.B.5	5.2.2.e	same - GL 82-12 spelled out in detail for Trojan, referred to for D-1
6.2.B.6	5.2.2.g	Shift Mngr Certified Fuel Handler
6.2.B.7	5.2.2.f	Shift Mngr report to individual who is a Certified Fuel Handler
6.2.C	N/A	STA position
6.3.	5.3.1	UNIT STAFF QUALIFICATIONS Refers to no need for Unit 1 NRC licenses
6.4.	5.4.1	TRAINING - Trojan refers to Certified Fuel Handler, Dresden generic
None	5.5	Reviews and Audits - This was removed from Unit 1 in Amendment 38
None	5.6	Tech Spec Bases Control - not in Dresden TS

COMPARISON BETWEEN UNIT 1 AND TROJAN TS

Proposed	Trojan	Notes
6.5	N/A	BLANK
6.6	N/A	BLANK
6.7	N/A	SAFETY LIMIT VIOLATION N/A to Unit 1
6.8	5.7	PROCEDURES AND PROGRAMS
6.8.A	5.7.1.1	same
6.8.A.1	5.7.1.1.a	same - Reg Guide 1.33 procedures
6.8.A.2	N/A	Deleted from Unit 1, refers to EOPs and NUREG 0737
6.8.A.3	5.7.1.1.b	same - security plan
None	5.7.1.1.d	Trojan has QA program for rad effluent and rad monitoring. D-1 in QA Manual
6.8.A.4	5.7.1.1.c	same - GSEP
6.8.A.5	5.7.1.1.f	same PCP - Trojan 5.7.2.2, D-1 6.13
6.8.A.6	5.7.1.1.f	same - ODCM - Trojan 5.7.2.3, D-1 6.14
6.8.A.7	5.7.1.1.e	same - fire protection
6.8.B	5.7.1.2	Deleted from Dresden TS and placed in Decommissioning Plan - Review and Approval
6.8.C	5.7.1.3	Deleted from Dresden - Temporary Changes
6.8.D	5.7.2	The following programs shall be ...
6.8.D.1	N/A	Deleted from Unit 1, not applicable to a shutdown plant
6.8.D.2	N/A	Deleted from Unit 1, not applicable to a shutdown plant
6.8.D.3	N/A	Deleted from Unit 1, not applicable to a shutdown plant
6.8.D.4	5.7.2.4	same - Dresden more restrictive and encompassing
6.8.D.5	N/A	Deleted from Unit 1, not applicable to a shutdown plant
3.8.D	5.7.2.6	Storage Tank Radioactivity Monitoring Program - in 3/4.8.J for D1
3.10.F	5.7.2.8	Spent Fuel Pool Water Chemistry Program - in 3/4.10.A.2 for D1
None	5.7.2.9	Control Building Structural Monitoring - N/A for D1
6.9	TITLE	REPORTING REQUIREMENTS
6.9.A	TITLE	ROUTINE REPORTS - Trojan talks about 50.4
6.9.A.1	N/A	Deleted
6.9.A.2	N/A	same - Radiation exposure report
6.9.A.3	5.8.1.2	same - Annual rad envir report
6.9.A.4	5.8.1.3	same - Rad effluent release report
6.9.A.5	N/A	Monthly operating report, deleted from Unit 1
6.9.A.6	N/A	COLR, deleted from Unit 1
None	5.9	Record Retention - D1 located in Decommissioning Plan
6.9.B	N/A	Special Reports
6.10.	N/A	BLANK
6.11	5.7.2.1	RADIATION PROTECTION PROGRAM
6.12	5.10.	HIGH RADIATION AREA
6.13	5.7.2.2	PROCESS CONTROL PROGRAM
6.14	5.7.2.3	ODCM