

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



June 5, 1997

JSPLTR #97-0109

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

Subject: Dresden Nuclear Power Station Unit 1  
Application for Amendment to Facility Operating License DPR-2  
Technical Specifications, **NRC Docket 50-010**

References: a) J. S. Perry letter to U. S. NRC dated October 23, 1996  
b) J. S. Perry letter to U. S. NRC dated November 25, 1996

ComEd submitted a request for an amendment to the Technical Specifications of the License for Dresden Unit 1 in reference (a) as revised in reference (b). That amendment request revised the Technical Specifications to a format consistent with the recently approved Technical Specification upgrade for Dresden Units 2 and 3, and proposed other miscellaneous changes related to the decommissioning status of Unit 1. This letter submits an update to the proposed Technical Specification Amendment.

Attachment 1 describes the update to the previously submitted amendment request, compares it to the technical specification currently in effect and provides the reason for the changes. Attachment 2 is a replacement for pages 3/4.8-2, 6-2, 6-3, 6-5, 6-6, and 6-11 of the proposed Technical Specifications.

The evaluation of significant hazards consideration, environmental assessment and irreversible consequences assessment included with reference (a) have been reviewed in light of these changes and the conclusions reached in those assessments are not affected.

This update to the amendment request has been reviewed and approved by ComEd's Onsite and Offsite Review functions in accordance with ComEd procedures.

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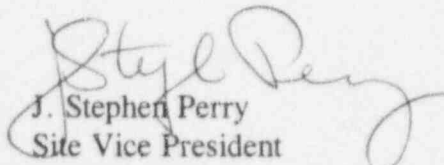


To the best of my knowledge and belief, the statements contained above are true and correct. In some respect these statements are not based on my personal knowledge, but are obtained from information furnished by other ComEd employees, contract employees and consultants. Such information has been reviewed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

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

Please direct any questions you may have concerning this submittal to Thomas L. Nauman, Unit 1 Manager, extension 2841.

Sincerely,

  
J. Stephen Perry  
Site Vice President  
Dresden Station

Subscribed and Sworn to before me

on this 5th day of

June, 1997.



Notary Public



JSP/tln:lad

Attachments

cc: A. Bill Beach, Regional Administrator, NRC, Region III  
M. K. Webb, Project Manager, NRR (Unit 1)  
NRC Senior Resident Inspector, Dresden Station  
Illinois Department of Nuclear Safety, State of Illinois  
File: Numerical

## ATTACHMENT 1

### Description Of Change And Comparison To Current Technical Specification

#### Current Technical Specification 3/4.8.D

Section 3/4.8, paragraph D on page 3/4.8-3 of the current Technical Specifications (Amendment 38), in part, states "The maximum amount of radioactivity in liquid storage in all Dresden Station's 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." and "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."

In the amendment request of reference (a), it was proposed to move and retitle the Technical Specification 3/4.8.J "Liquid Radwaste Storage", and modify the Technical Specification to the Dresden Units 2/3 Technical Specification Upgrade format. The proposed requirements and surveillances were to remain the same as the current Technical Specification.

This update revises Section 3/4.8.J of the proposed Technical Specification to read as follows: "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 48 hours reduce the tank contents to within the limit by recycling the stored liquid to below grade tanks." and "A sample from each of the above grade liquid waste tanks shall be taken, analyzed, and recorded every 7 days. If no additions to a tank have been made since the last sample, the tank need not be sampled until the next addition."

#### Reason For Change

The change revises the action time limit for recycling tank contents from "24 hours" to "48 hours".

The change revises the surveillance frequency from "72 hours" to "7 days".

These changes make the proposed Technical Specification 3/4.8.J action time limit and surveillance frequency the same as the Dresden Unit 2/3 Technical Specification 3/4.8.J.

### Current Technical Specification 6.1.A.3

Section 6.1, paragraph A.3 on page 6-1 of the current Technical Specifications (Amendment 38), states "Chief Nuclear Officer (CNO) shall have 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."

In the amendment request of reference (a), the quoted paragraph was moved intact to section 6.2.A.3.

In the amendment request of reference (b) it states "The Senior Vice President, Corporate Strategic Services shall have corporate responsibility for the safe storage of irradiated fuel and shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining and providing technical support to the structures and systems necessary to ensure safe storage of irradiated fuel".

This update revises Section 6.2.A.3 of the proposed Technical Specification to read as follows:  
"A Corporate Vice President shall have corporate responsibility for the safe storage of irradiated fuel 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 the safe storage of irradiated fuel."

In the amendment request of reference (b), a substantive change was made to substitute safe storage of irradiated fuel for overall plant nuclear safety. This change has been retained in the current request. Given the decommissioning status of Dresden Unit 1 (fuel has been permanently removed from the reactor vessel), safe storage of irradiated fuel is the principal safety concern. This change is consistent with changes made to similar technical specifications approved for the permanently shutdown Trojan facility.

In the amendment request of reference (b), "technical support to the plant" was changed to "technical support to the structures and systems necessary." This change has not been retained.

In the amendment request of reference (b), a substantive change was made to shift the overall safety responsibility at the corporate level from the Chief Nuclear Officer to another officer of the corporation, the Senior Vice President, Corporate Strategic Services. A substantive change has been made to this paragraph. The change is the shift in overall safety responsibility at the corporate level from the Chief Nuclear Officer to another officer of the corporation, a Corporate Vice President.

The implementation of ComEd's Quality Assurance Program on Dresden Unit 1 activities will remain the same, as well as oversight of the program implementation.

#### Reason For Change

The change replacing "technical support to the plant" with "technical support to the structures and systems necessary" proposed in the amendment request of reference (b) is not being made.

This change was not consistent with the wording of the current Dresden Unit 1 Technical Specification 6.1.3 and Dresden Unit 2/3 Technical Specification 6.2.A.3. This change is not substantive and does not have an affect on the content of the proposed Technical Specification.

The transition of responsibility is being made for three reasons. First, it will enable the Chief Nuclear Officer to further focus on improving the performance of ComEd's twelve operating units. Second, ComEd recognizes the need to develop competencies for its long term decommissioning responsibilities associated with nuclear generation. A Corporate Vice President will devote separate management attention at the executive level to develop this important function, beginning with responsibility for safe storage of irradiated fuel at the permanently shutdown Dresden Unit 1 facility. Third, the terminology Corporate Vice President allows for latitude in making future changes to administrative titles.

#### Current Technical Specification 6.1.A.4

Section 6.1, paragraph A.4 on page 6-1 of the current Technical Specifications (Amendment 38) states, "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 operating pressures."

In the amendment request of reference (a), it was proposed to move this Technical Specification intact to Technical Specification 6.2.A.4 to be consistent with the Technical Specification Upgrade Program. However, in the transition "operating staff" was inadvertently changed to "staff". Attachment 2 retains the terminology "operating staff" in accordance with the amendment request of reference (a).

#### Reason For Change

This change is being made in accordance with the amendment request of reference (a).

#### Current Technical Specification 6.1.C

In Section 6.1, paragraph C on page 6-1 of the current Technical Specifications (Amendment 38) it states, in part "The Operations Manager or Shift Operations Supervisor, Shift Managers, Unit Supervisors, and Field Supervisors shall have a Senior Operating License."

In the amendment request of reference (a), it was proposed , in part, to replace Technical Specification 6.1.C with Technical Specification 6.2.B.6 which states "The Unit 2/3 Operations Manager or Unit 2/3 Shift Operations Supervisor shall hold an active Unit 2/3 Senior Reactor Operator License". This change was made to model the Unit 2/3 Technical Specification Upgrade Program and ensure that a person who is currently trained on Unit 1 in the Licensed Operator Retraining Program is in charge of Control Room personnel monitoring Unit 1 activities.

This update revises Section 6.2.B.6 of the proposed Technical Specification to read as follows: "The Unit 2/3 Operations Manager or Unit 2/3 Shift Operations Supervisor shall hold a Unit 2/3 Senior Reactor Operator License."

This change removes a substantive change proposed in the amendment request of reference (a). The terminology "active Senior Reactor Operators License" is changed to "Senior Reactor Operators License".

#### Reason For Change

This change makes proposed Technical Specification 6.2.B.6 consistent with the Dresden Unit 2/3 Technical Specification 6.2.B.6 and previous Unit 1 Technical Specification 6.1.C. This change eliminates a requirement that was inadvertently added in the amendment request of reference (a).

#### Current Technical Specification 6.2.A

In Section 6.2, paragraph A on page 6-13 and 6-14 of the current Technical Specifications (Amendment 38) controls for plant operating procedures are specified.

In the amendment request of reference (a), Technical Specification 6.8.A.1 was proposed which states "The procedures applicable to the safe storage of irradiated fuel recommended in Appendix A, of Regulatory Guide 1.33, Revision 2, February 1978;".



This update revises Section 6.8.A.1 and adds Section 6.8.A.8 of the proposed Technical Specification to read as follows:

- 6.8.A.1. The procedures applicable to the safe storage and handling of irradiated fuel recommended in Appendix A, of Regulatory Guide 1.33, Revision 2, February 1978;
- 6.8.A.8. Winterization Program applicable to the safe storage and handling of irradiated fuel.

A substantive change is being made to the proposed Technical Specification 6.8.A.1. This change adds the requirement for procedural controls for the safe handling of irradiated fuel.

Technical Specification 6.8.A.8 is being added to ensure procedural controls for the Winterization Program applicable to the safe storage and handling of irradiated fuel.

#### Reason For Change

This change is being made to ensure procedures are established, implemented, and maintained covering the safe handling of irradiated fuel and the Winterization Program.

#### Proposed Technical Specification 6.8.D.4

In the amendment request of reference (a), it was proposed to add Technical Specification 6.8.D.4 for the Radioactive Effluent Control Program. Technical Specification 6.8.D.4 was proposed to be word for word the same as the Unit 2/3 Technical Specification 6.8.D.4. However, in making the change to Technical Specification 6.8.D.4.b the wording "to 10 CFR Part 20.1001 - 20.2402," was inadvertently omitted. Attachment 2 contains Technical Specification 6.8.D.4 which is word for word the same as the Dresden Unit 2/3 Technical Specification 6.8.D.4 in accordance with the amendment request of reference (a).

#### Reason For Change

This change is being made in accordance with the amendment request of reference (a).

#### Proposed Technical Specification 6.12.B

In the amendment request of reference (a), it was proposed to add Technical Specification 6.12.B for the control of High Radiation Areas. Technical Specification 6.12.B was proposed to be equivalent to the Unit 2/3 Technical Specification 6.12.B. However, in making the change to Technical Specification 6.12.B.2, the wording "(or equivalent document)" was inadvertently omitted. Attachment 2 contains Technical Specification 6.12.B which is word for word the same as the Dresden Unit 2/3 Technical Specification 6.12.B in accordance with the amendment request of reference (a).

#### Reason For Change

This change is being made in accordance with the amendment request of reference (a).