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RS-01-171

September 6, 2001

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

Clinton Power Station, Unit 1  
Facility Operating License No. NPF-62  
NRC Docket No. 50-461

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

LaSalle County Station, Units 1 and 2  
Facility Operating License Nos. NPF-11 and NPF-18  
NRC Docket Nos. 50-373 and 50-374

Quad Cities Nuclear Power Station, Units 1 and 2  
Facility Operating License Nos. DPR-29 and DPR-30  
NRC Docket Nos. 50-254 and 50-265

Subject: Long Term Solution Stability System Oscillation Power Range Monitor  
Revised Implementation Plan

- References:
- (1) Letter from R. M. Krich (Commonwealth Edison Company) to U.S. NRC, "Long Term Solution Stability System Oscillation Power Range Monitor Installation Status and Revised Implementation Schedule," dated June 5, 2000.
  - (2) Letter from C. G. Pardee (Commonwealth Edison Company) to U.S. NRC, "Application for Amendment to Appendix A, Technical Specifications for the Oscillation Power Range Monitor Instrumentation," dated November 10, 2000.
  - (3) Letter from R. M. Krich (Commonwealth Edison Company) to U.S. NRC, "Long Term Solution Stability System Oscillation Power Range Monitor Revised Implementation Schedule for LaSalle County Station," dated April 5, 2001.
  - (4) Letter from M. T. Coyle (AmerGen Energy Company, LLC) to U.S. NRC, "Revision to the Clinton Power Station Implementation Schedule for the Resolution to Generic Letter (GL) 94-02, Long-Term Solution and Upgrade of Interim Operating Recommendation for Thermal-Hydraulic Instabilities in Boiling Water Reactor," dated March 30, 2000.

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- (5) Letter from J. M. Heffley (AmerGen Energy Company, LLC) to U.S. NRC, "Request for Amendment to Appendix A, Technical Specifications for the Oscillation Power Range Monitor Instrumentation," dated June 1, 2001.

Exelon Generation Company (EGC), LLC, formerly Commonwealth Edison (ComEd) Company, in Reference 1 provided the NRC with the implementation schedule for the Long Term Solution Stability System Oscillation Power Range Monitor (OPRM) for Dresden Nuclear Power Station (DNPS), LaSalle County Station (LCS) and Quad Cities Nuclear Power Station (QCNPS). EGC in Reference 2, provided the NRC with a revised schedule for the OPRMs at LCS and in Reference 3, provided the NRC with the proposed Technical Specifications (TS) for the LCS OPRMs.

AmerGen Energy Company (AmerGen), LLC, in Reference 4 provided the NRC with the implementation schedule for the OPRM for Clinton Power Station (CPS). AmerGen in Reference 5, provided the NRC with proposed TS for the CPS OPRM.

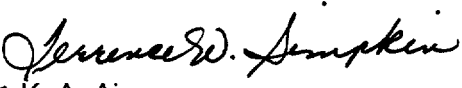
General Electric Company (GE) on June 29, 2001, issued a 10 CFR 21, "Reporting of Defects and Noncompliance," notification identifying potential non-conservative assumptions used in the generation of OPRM trip setpoints. The assumptions were utilized in developing the OPRM trip setpoints for CPS, DNPS, LCS and QCNPS. As a result, we have decided to revise our OPRM implementation plans as follows.

- We have decided not to arm the OPRM trip functions at CPS, DNPS, LCS and QCNPS until after the resolution of the GE 10 CFR 21 issue.
- In the interim, CPS, DNPS, LCS and QCNPS will continue to use the Interim Corrective Actions (ICAs) specified in NRC Bulletin 88-07, Supplement 1, "Power Oscillations in Boiling Water Reactors (BWRs)," and "BWR Owners Group Guidelines for Stability Interim Corrective Action," dated June 6, 1994. The use of the ICAs will ensure that appropriate actions are taken to prevent or mitigate any potential core instability event, thus ensuring continued safe plant operation.
- We request that the proposed TS amendment requests for LCS, Reference 2, and CPS, Reference 5, be withdrawn. The withdrawal requests are based on the extended time period GE is projecting to resolve this issue (i.e., 12 to 18 months), potential changes needed to the submittals to address the non-conservative OPRM assumptions and discussions with the NRC on August 7, 2001.
- Based on current information and schedules to resolve this issue, we intend to submit proposed TS amendments for CPS, DNPS, LCS and QCNPS in the Fall of 2002. However, this date may be adjusted based upon any changes in the projected resolution schedule.

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Should you have any questions concerning this submittal, please contact Mr. T. W. Simpkin at (630) 657-2821.

Respectfully,

  
for K. A. Ainger  
Director - Licensing  
Mid-West Regional Operating Group

cc: Regional Administrator – NRC Region III  
NRC Senior Resident Inspector - Clinton Power Station  
NRC Senior Resident Inspector - Dresden Nuclear Power Station  
NRC Senior Resident Inspector - LaSalle County Station  
NRC Senior Resident Inspector - Quad Cities Nuclear Power Station  
Office of Nuclear Facility Safety - Illinois Department of Nuclear Safety