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RS-01-194

September 14, 2001

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

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

**Subject:** Additional Risk Information Supporting the License Amendment Request to Permit Uprated Power Operation at Dresden Nuclear Power Station

- References:**
- (1) Letter from R. M. Krich (Commonwealth Edison Company) to U. S. NRC, "Request for License Amendment for Power Uprate Operation," dated December 27, 2000
  - (2) Letter from K. A. Ainger (Exelon Generation Company, LLC) to U. S. NRC, "Additional Risk Information Supporting the License Amendment Request to Permit Uprated Power Operation at Dresden Nuclear Power Station and Quad Cities Nuclear Power Station," dated August 14, 2001
  - (3) Letter from K. A. Ainger (Exelon Generation Company, LLC) to U. S. NRC, "Additional Risk Information Supporting the License Amendment Request to Permit Uprated Power Operation at Dresden Nuclear Power Station and Quad Cities Nuclear Power Station," dated September 5, 2001

In Reference 1, Commonwealth Edison Company, now Exelon Generation Company (EGC), LLC, submitted a request for changes to the operating licenses and Technical Specifications (TS) for Dresden Nuclear Power Station (DNPS), Units 2 and 3, and Quad Cities Nuclear Power Station (QCNPS), Units 1 and 2, to allow operation with an extended power uprate (EPU). In a July 18, 2001, telephone conference call between representatives of EGC and Mr. L. W. Rossbach and other members of the NRC, the NRC requested additional information regarding these proposed changes. In References 2 and 3, EGC provided a portion of the requested information. The attachment to this letter provides the remainder of the information. In an August 31, 2001, teleconference between representatives of EGC and Mr. J. Hopkins and other members of the NRC, it was agreed that EGC would provide this information for DNPS by September 14, 2001.

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Should you have any questions concerning this letter, please contact Mr. A. R. Haeger at (630) 657-2807.

Respectfully,



T. W. Simpkin  
Manager – Licensing  
Mid-West Regional Operating Group

Attachments:

Affidavit

Attachment: Additional Risk Information Supporting the License Amendment Request to Permit  
Up-rated Power Operation

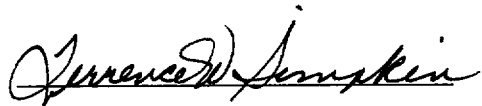
cc: Regional Administrator - NRC Region III  
NRC Senior Resident Inspector - Dresden Nuclear Power Station  
Office of Nuclear Facility Safety - Illinois Department of Nuclear Safety

STATE OF ILLINOIS )  
COUNTY OF DUPAGE )  
IN THE MATTER OF )  
EXELON GENERATION COMPANY, LLC ) Docket Numbers  
DRESDEN NUCLEAR POWER STATION, UNITS 2 AND 3 ) 50-237 AND 50-249

**SUBJECT:** Additional Risk Information Supporting the License Amendment Request to Permit Up-rated Power Operation at Dresden Nuclear Power Station

**AFFIDAVIT**

I affirm that the content of this transmittal is true and correct to the best of my knowledge, information and belief.



T. W. Simpkin  
Manager – Licensing  
Mid-West Regional Operating Group

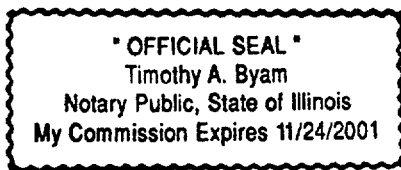
Subscribed and sworn to before me, a Notary Public in and

for the State above named, this 14<sup>th</sup> day of

September, 2001.



Notary Public



**Attachment**  
**Additional Risk Information Supporting the License Amendment Request to**  
**Permit Uprated Power Operation**  
**Dresden Nuclear Power Station, Units 2 and 3**

Question

*11. What is the current plant's estimated seismic CDF and what is the estimated impact of the extended power uprate on this seismic CDF? Please explain the bases for deriving this estimate.*

Response

As noted in the previous partial response to Question 11 in Reference 1, the response to this question addresses the seismic dam failure scenario and the use of the isolation condenser for the safe shutdown path. This scenario does not include a postulated small break LOCA. This scenario is of interest because it corresponds to the only seismic margins outlier identified in the Dresden Nuclear Power Station (DNPS) Individual Plant Examination of External Events (Reference 2) that will not have been corrected at the time of extended power uprate (EPU) implementation. In accordance with this request, and since DNPS, like many other sites, does not currently maintain a seismic probabilistic risk assessment (PRA), the response to this question includes a quantitative estimate of the core damage frequency (CDF) prior to the EPU for this specific scenario. The basis for deriving this estimate was described in the partial response to Question 11 in Reference 1.

The CDF for the seismic dam failure scenario prior to implementation of the EPU is estimated at  $9E-6/yr$ . This result, combined with the estimated impact of the EPU on the CDF for this scenario provided in Reference 1 (i.e., an increase of  $1E-8/yr$ ), demonstrates that operation following EPU, but prior to correcting the seismic margins outlier related to isolation condenser makeup path, has a minimal effect on plant safety.

Reference

1. Letter from K. A. Ainger (Exelon Generation Company, LLC) to U. S. NRC, "Additional Risk Information Supporting the License Amendment Request to Permit Uprated Power Operation at Dresden Nuclear Power Station and Quad Cities Nuclear Power Station," dated September 5, 2001
2. Letter from P. Swafford (Commonwealth Edison Company) to U. S. NRC, "Request for Additional Information Regarding Individual Plant Examination of External Events," dated March 30, 2000