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DRL/DRS Branch Chiefs

Docket No. 50-249

Commonwealth Edison Company
ATTN: Mr. Byron Lee, Jr.
Assistant to the President
P. O. Box 767
Chicago, Illinois 60690

Gentlemen:

We have reviewed your letters dated August 12, 1971, and August 18, 1971, requesting elimination of the requirement to perform measurements on Dresden Unit 3 to verify the adequacy of the design of the steam separator and dryer with regard to moisture carryover to the turbine and steam carryunder to the jet pumps.

Since the results of similar tests performed on Dresden Unit 2 indicated satisfactory performance of the steam dryer and since the steam separator dryer configuration on Dresden Unit 3 is identical to that of Unit 2, we conclude that the proposed change to the start-up test program does not present significant hazards considerations not described or implicit in the safety analysis report and that there is reasonable assurance that the health and safety of the public will not be endangered by deletion of this test. Accordingly, Page 13.8-1 for Dresden Unit 3 safety analysis report will be replaced by the enclosed Page 13.8-1 (Rev. 8/12/71).

Sincerely,

Original signed by F. Schroeder

Peter A. Morris, Director
Division of Reactor Licensing

Enclosure:
Page 13.8-1 (Rev 8/12/71)

cc: Arthur C. Gehr, Esquire
Isham, Lincoln & Beale
Counselors at Law

S. Kari
M. J. Wetterhahn
OGC
CO (2)
ACRS (16)

OFFICE ▶	DRL:BWR-2	DRL:BWR-2	DRL:BWR	CO	DRL:DDIR	DRL:DIR
	previously concurred in on atch pg			9-15-71		
SURNAME ▶	MJWetterhahn	sajRLTedesco	RSBoyd	JKeppler	FSchroeder	PAMorris
DATE ▶	9/15/71	9/ /71	9/ /71	9/ /71	9/15/71	9/15/71

Form AEC-318 (Rev. 9-53) AECM 0240 ☆ U. S. GOVERNMENT PRINTING OFFICE: 1971—416—469

*Rev. 8-12-71

13.8 STARTUP AND POWER TEST PROGRAM

13.8.1 General Requirements: The startup and power test program is performed to assure that the plant is capable of operating safely and satisfactorily. Systems and components, which cannot be fully checked out in pre-operational test phase, are tested at power during this phase of the unit startup to confirm reactor parameters and characteristics determined by an extensive program of analysis and tests executed prior to initial fuel loading. The nuclear characteristics of fuel, control rods and control curtains are calculated with methods which are continuously compared with results of experiments in the Vallecitos Atomic Laboratory's critical facilities, including measurements of simular or identical components. In addition, startup tests and operating data from other boiling water reactors in commercial operation and other measurements throughout the nuclear industry are used to confirm the applicability of the analytical methods.

The tests listed in 13.8.3, 13.8.4 and 13.8.5 will be conducted on Dresden Unit 2 and the results will be considered in preparing the specific tests to be performed in Unit 3.

* Tests which are unnecessary for Unit 3 are: 13.8.3g, Control Rod Sequence; 13.8.5s, Calibration of Rods; 13.8.5u, Rod Pattern Exchange and 13.8.4k, 13.8.5v, Steam Separator-Dryer Measurements. Tests which will be modified depending on the Unit 2 results, to collect a limited amount of data are: 13.8.3c, Radiation Measurements; 13.8.3d, Vibration Measurements; 13.8.3h, SRM Performance, 13.8.5h, Recirculation Jet Pumps and 13.8.5t, Axial Power Distribution.

13.8.2 General Procedures: The startup procedures will be written, with individual detailed sub-sections.

13.8.3 Fuel Loading and Tests at Atmospheric Pressure: The initial fuel loading and critical testing are performed at near-zero power, and at atmospheric pressure, with the reactor pressure vessel open. The following tests are performed during this phase of the startup program:

a. Chemical and Radiochemical tests are conducted to establish water conditions prior to initial operation and to maintain these throughout the test program. Chemical and radiochemical checks are made at primary coolant, off-gas exhaust, waste and auxillary system sample locations. Base or background radioactivity levels are determined at this time for use in fuel assembly failure detection and long range activity buildup studies.

b. Control Rod Drive System tests are performed on all drives prior to fuel loading to assure proper operability and to measure and adjust operating speeds. Drive line friction and scram times are determined for all drives at zero reactor pressure. Functional testing of each drive is performed with dummy fuel just prior to and then following the fuel loading in each cell.

c. Radiation Measurements are made prior to nuclear operation to establish base levels in the plant and the nearby environs.

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ATTN: Mr. Byron Lee, Jr.,
Assistant to the President
P. O. Box 767
Chicago, Illinois 60690

Gentlemen:

We have reviewed your proposal requested by your letters dated August 12, 1971 and August 18, 1971, to eliminate the test on Dresden Unit 3 to verify the adequacy of the design of the steam separator and dryer with regard to moisture carryover to the turbine and steam carryunder to the jet pumps.

We find that the deleted test will not provide more information than similar tests which have been performed on Dresden Unit 2 and that the results of the tests on Dresden Unit 2 indicated satisfactory performance of the steam dryer. We, therefore, conclude that the proposed change to the startup test program does not present significant hazards considerations not described or implicit in the safety analysis report and that there is reasonable assurance that the health and safety of the public will not be endangered. Accordingly, Page 13.8-1 for Dresden Unit 3 safety analysis report will be replaced by the enclosed Page 13.8-1 (Rev. 8/12/71).

Sincerely,

Peter A. Morris, Director
Division of Reactor Licensing

Enclosure:
Page 13.8-1 (Rev. 8/12/71)

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Retyped per comments

S. Kari
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