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Exelon Nuclear

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U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

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

Limerick Generating Station, Units 1 and 2
Facility Operating License Nos. NPF-39 and NPF-85
NRC Docket Nos. 50-352 and 50-353

Peach Bottom Atomic Power Station, Units 2 and 3
Facility Operating License Nos. DPR-44 and DPR-56
NRC Docket Nos. 50-277 and 50-278

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

Oyster Creek Generating Station
Facility Operating License No. DPR-16
NRC Docket No. 50-219

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

Subject: Notification of Intent to use "Implementing Improved GE Steady-State Methods"

Dear Sir/Madam:

As requested in Generic Letter (GL) 83-11, Supplement 1, "Licensee Qualification for Performing Safety Analyses", dated June 24, 1999, this letter serves to notify the U. S. Nuclear Regulatory Commission (USNRC) of the intent to use the generically approved "Implementing Improved GE Steady-State Methods." The specific steady-state analyses which Exelon Generation Company, LLC (Exelon) intends to use are the improved GE steady-state methods for the reactivity anomaly evaluations and cold shutdown margin evaluations. Exelon has implemented the program discussed in GL 83-11 for use of the improved GE steady-state

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methods as discussed in Attachment 1. Documentation regarding this qualification is available for USNRC audit.

As discussed in the GL, "the licensee should send the NRC a notification of its having followed the guidelines at least 3 months before the date of its intended first licensing application." The date of the first application of the improved GE steady-state methods is the startup of Oyster Creek, Cycle 19, currently scheduled for October 2002.

Commitments associated with this letter are contained in Attachment 2, "Summary of Exelon Commitments."

If you have any questions, please contact us.

Very truly yours,

Michael P. Gallagher
Director, Licensing and Regulatory Affairs
Mid-Atlantic Regional Operating Group

Attachments

cc: Regional Administrator – NRC Region I
Regional Administrator – NRC Region III
NRC Senior Resident Inspector – Dresden Nuclear Power Station
NRC Senior Resident Inspector – LaSalle County Station
NRC Senior Resident Inspector – Limerick Generating Station
NRC Senior Resident Inspector – Peach Bottom Atomic Power Station
NRC Senior Resident Inspector – Quad Cities Nuclear Power Station
NRC Senior Resident Inspector – Oyster Creek Generating Station
NRC Senior Resident Inspector – Clinton Power Station

Eligibility

The NRC has generically approved "Implementing Improved GE Steady-State Methods" (References 1 and 2). Reactivity anomaly evaluations and shutdown margin evaluations are the specific steady-state evaluations which Exelon intends to utilize.

References:

1. "Amendment 26 To GE Licensing Topical Report NEDE-24011-P-A, "GESTAR II" Implementing Improved GE Steady-State Methods (TAC NO. MA6481)," November 10, 1999.

2. "SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION – AMENDMENT 26 TO GENERAL ELECTRIC COMPANY (GE) TOPICAL REPORT NEDE-24011-P-A, "GESTAR II" ITEM 2: IMPLEMENTING IMPROVED GE STEADY-STATE METHODS," November 10, 1999.

Application Procedures

All applicable procedures were reviewed. Procedures having dependencies related to the steady-state methods were identified. Revisions to these procedures to include the instructions and restrictions on the use of the Improved GE Steady-State Methods for tasks related to reactivity anomaly and cold shutdown margin evaluations will be completed. Certification Guides (Qualification Requirements) associated with the revised procedures will be reviewed and revised as appropriate.

Training and Qualification of Licensee Personnel

Global Nuclear Fuels (GNF) gave formal Improved GE Steady-State Methods training to selected Exelon Nuclear Fuel Management employees. The qualification of personnel will be maintained on a task specific basis.

Comparison Calculations

Exelon performed comparison calculations with the Improved GE Steady-State Methods. The results were compared to Startup Tests (Cold Criticals - both local and distributed) and Measured Flux Detector Data (Traversing In-Core Probes - TIPs). Furthermore, the results were also compared to higher order methods and the core monitoring system results. The focus of these comparisons was those parameters that most affect Reactivity Anomaly and Cold Shutdown Margin such as: 1) Hot and Cold K-effective behavior with cycle burnup; 2) Hot Power Distribution and associated Thermal Margin behavior; and 3) One-Rod-Out Shutdown Margin predictions.

The results of these comparison calculations are documented in a report maintained in accordance with Exelon's quality assurance program.

Quality Assurance and Change Control

GNF provides the Improved GE Steady-State Methods through the General Electric Nuclear Interactive Evaluation (GENIE) System product. Updates to the GENIE System product are provided to Exelon. GNF also provides Engineering Computer Program Problem Reports associated with the GENIE components. The GENIE updates are installed in accordance with the Exelon Digital Technology Systems Quality Assurance procedures.

Evaluations performed with Improved GE Steady-State Methods — specifically Reactivity Anomaly and Cold Shutdown Margin — will be conducted under the control of the Exelon Quality Assurance Program.

SUMMARY OF EXELON NUCLEAR COMMITMENTS

The following table identifies commitments made in this document by Exelon Nuclear. (Any other actions discussed in the submittal represent intended or planned actions by Exelon Nuclear. They are described to the NRC for the NRC's information and are not regulatory commitments.)

COMMITMENT	COMMITED DATE OR "OUTAGE"
"Revisions to these procedures to include the instructions and restrictions on the use of the Improved GE Steady-State Methods for tasks related to reactivity anomaly and cold shutdown margin evaluations will be completed. Certification Guides (Qualification Requirements) associated with the revised procedures will be reviewed and revised as appropriate."	Prior to startup of Oyster Creek, Cycle 19, currently scheduled for October 2002.