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July 17, 2003

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 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 Information Regarding Request for License Amendment for Pressure-Temperature Limits

Reference: Letter from P. R. Simpson, (Exelon Generation Company, LLC) to U. S. NRC, "Request for Changes Related to Technical Specifications Section 3.4.9, 'Reactor Coolant System Pressure and Temperature Limits,'" dated February 27, 2003

In the referenced letter, Exelon Generation Company (EGC), LLC, requested a change to Facility Operating License Nos. DPR-19 and DPR-25 and the Technical Specifications (TS) for Dresden Nuclear Power Station (DNPS), Units 2 and 3, regarding reactor coolant system pressure and temperature limits.

In a teleconference between Ms. M. Banerjee of the NRC and Mr. A. R. Haeger of EGC on July 2, 2003, the NRC requested that EGC revise the information in the referenced letter that supported a finding of no significant hazards consideration. The attachment to this letter provides the revised information.

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

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 17th day of July 2003.

Respectfully,



Patrick R. Simpson
Manager - Licensing
Mid-West Regional Operating Group

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

Attachment

Additional Information Regarding Request for License Amendment for Pressure-Temperature Limits

No Significant Hazards Consideration

Exelon Generation Corporation (EGC), LLC, has evaluated the proposed changes to the Technical Specifications (TS) and Operating Licenses for Dresden Nuclear Power Station (DNPS), Units 2 and 3, and has determined that the proposed changes do not involve a significant hazards consideration. EGC is providing the following information to support a finding of no significant hazards consideration.

Does the change involve a significant increase in the probability or consequences of an accident previously evaluated?

Response: No

The proposed changes request that, for DNPS, Units 2 and 3, the pressure and temperature (P/T) limit curves in TS 3.4.9, "RCS Pressure and Temperature (P/T) Limits," be revised and that the license conditions specified in Operating License Sections 2.C(8) and 3.P, "Pressure-Temperature Limit Curves," for DNPS, Units 2 and 3, respectively, be deleted.

The P/T limits are prescribed during all operational conditions to avoid encountering pressure, temperature, and temperature rate of change conditions that might cause undetected flaws to propagate, resulting in non-ductile failure of the reactor coolant pressure boundary, which is an unanalyzed condition. The methodology used to determine the P/T limits has been approved by the NRC and thus is an acceptable method for determining these limits. Therefore, the proposed changes do not affect the probability of an accident previously evaluated.

There is no specific accident that postulates a non-ductile failure of the reactor coolant pressure boundary. The loss of coolant accident analyzed for the plant assumes a complete break of the reactor coolant pressure boundary. The revision to the P/T limits does not change this assumption. Thus, the radiological consequences of any accident previously evaluated are not increased.

Therefore, the proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.

Does the change create the possibility of a new or different kind of accident from any accident previously evaluated?

Response: No

The proposed changes do not change the response of plant equipment to transient conditions. The proposed changes do not introduce any new equipment, modes of system operation, or failure mechanisms.

Non-ductile failure of the reactor coolant pressure boundary is not an analyzed accident. The proposed changes to the P/T limits were developed using an NRC-approved methodology, and thus the revised limits will continue to provide protection against non-

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ductile failure of the reactor coolant pressure boundary. Therefore, the proposed changes do not create the possibility of a new or different kind of accident from any previously evaluated.

Does the change involve a significant reduction in a margin of safety?

Response: No

The margin of safety related to the proposed changes is the margin between the proposed P/T limits and the pressures and temperatures that would produce non-ductile failure of the reactor coolant pressure boundary. The use of an NRC-approved methodology together with conservatively-chosen plant-specific input parameters provides an acceptable margin of safety. Therefore, the proposed changes do not involve a significant reduction in a margin of safety.

Conclusion

Based upon the above responses, EGC concludes that the proposed amendment presents no significant hazards consideration under the standards set forth in 10 CFR 50.92 (c), "Issuance of amendment," and, accordingly, a finding of no significant hazards consideration is justified.