

**An Exelon/British Energy Company**

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**Nuclear**

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

Clinton Power Station  
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

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

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

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

**Subject: Notification of Intent to Perform Analyses Using Vendor Safety Analysis Codes**

As requested in Generic Letter (GL) 83-11, Supplement 1, "Licensee Qualification for Performing Safety Analyses," Exelon Generation Company, LLC (EGC) and AmerGen Energy Company, LLC (AmerGen) are notifying the NRC of our intent to perform safety analyses using computer codes supplied by Framatome Advanced Nuclear Products (FANP) based on NRC-approved methods. The specific steady-state analyses are the reactivity anomaly evaluations and cold shutdown margin evaluations. We have implemented the program discussed in GL 83-11, Supplement 1 as discussed in Attachment 1.

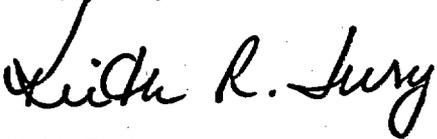
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As discussed in the GL, the licensee should send the NRC a notification of its having followed the guidelines at least three months before the date of its intended first licensing application. The first application of the FANP methods will occur in support of the startup of LaSalle County Station Unit 1 Cycle 11, currently scheduled to begin in January 2004.

Commitments associated with this letter are contained in Attachment 2.

If you have any questions, please contact Mr. Allan R. Haeger at (630) 657-2807.

Respectfully,



Keith R. Jury  
Director – Licensing and Regulatory Affairs  
Exelon Generation Company, LLC  
AmerGen Energy Company, LLC

Attachment 1: Summary of Program Controlling Use of Vendor Methodology  
Attachment 2: Summary of Commitments

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

## **Attachment 1**

### **Summary of Program Controlling Use of Vendor Methodology**

#### **Eligibility**

The NRC has approved the Framatome Advanced Nuclear Products (FANP) method CASMO-4/MICROBURN-B2 (Reference 1). Exelon Generation Company, LLC (EGC) and AmerGen Energy Company, LLC (AmerGen) intend to use CASMO-4/MICROBURN-B2 to perform reactivity anomaly evaluations and shutdown margin evaluations.

#### **Application Procedures**

All applicable procedures were reviewed. Procedures related to the steady-state methods were identified. Revisions to these procedures, including the instructions and restrictions on the use of CASMO-4/MICROBURN-B2 related to reactivity anomaly and cold shutdown margin evaluations, will be completed.

#### **Training and Qualification of Licensee Personnel**

FANP gave formal training to selected Nuclear Fuels employees. Personnel certification guides associated with the revised procedures will be reviewed and revised as appropriate. The qualification of personnel will be maintained on a task-specific basis.

#### **Comparison Calculations**

We will perform comparison calculations using CASMO-4/MICROBURN-B2. The results will be compared with startup test results (i.e., cold criticals) and measured flux detector data. The results will also be compared with core monitoring system results. The focus of these comparisons is on 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 will be documented in a calculation notebook maintained in accordance with our quality assurance program.

#### **Quality Assurance and Change Control**

FANP provides quality assurance and change control for CASMO-4/MICROBURN-B2 using a formal software development record. Once received, software is installed and controlled in accordance with our software quality assurance procedures.

Our software quality assurance program requires that any identified errors that affect the use or operation of software products be documented in our corrective action program. Currently, the software quality assurance program does not explicitly address informing the vendor of identified errors. By agreement with FANP, errors are reported to FANP. The requirement to inform the vendor will be added to the software quality assurance program.

Evaluations performed with CASMO-4/MICROBURN-B2 — specifically reactivity anomaly and cold shutdown margin — will be conducted under the control of our quality assurance program.

**Attachment 1**  
**Summary of Program Controlling Use of Vendor Methodology**

**Reference**

1. Letter from U. S. NRC to J. F. Mallay (Siemens Power Corporation), "Acceptance for Referencing of Licensing Topical Report EMF-2158(P), Revision 0, 'Siemens Power Corporation Methodology for Boiling Water Reactors: Evaluation and Validation of CASMO-4/MICROBURN-B2,'" dated October 18, 1999

**Attachment 2  
Summary of Commitments**

The following commitments are made in this document by Exelon Generation Company, LLC (EGC) and AmerGen Energy Company, LLC (Amergen). Any other actions discussed in the submittal represent intended or planned actions. They are described for the NRC's information and are not regulatory commitments.

<b>COMMITMENT</b>	<b>COMMITTED DATE OR OUTAGE</b>
<p>Revisions to procedures, including the instructions and restrictions on the use of CASMO-4/MICROBURN-B2 for tasks related to reactivity anomaly and cold shutdown margin evaluations, will be completed.</p>	<p>Prior to startup of LaSalle County Station, Unit 1 Cycle 11, currently scheduled for January 2004</p>
<p>Certification Guides associated with the revised procedures will be reviewed and revised as appropriate.</p>	<p>Prior to startup of LaSalle County Station, Unit 1 Cycle 11, currently scheduled for January 2004</p>
<p>We will perform comparison calculations using CASMO-4/MICROBURN-B2. The results will be compared with startup test results (i.e., cold criticals) and measured flux detector data. The results will also be compared with core monitoring system results. The focus of these comparisons is on 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.</p> <p>The results of these comparison calculations will be documented in a calculation notebook maintained in accordance with our quality assurance program.</p>	<p>Prior to startup of LaSalle County Station, Unit 1 Cycle 11, currently scheduled for January 2004</p>
<p>The software quality assurance program will be revised to require that EGC/AmerGen notify vendors of errors discovered in vendor-supplied computer codes.</p>	<p>Prior to startup of LaSalle County Station, Unit 1 Cycle 11, currently scheduled for January 2004</p>