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Exelon Nuclear

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

Clinton Power Station, Unit 1
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

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: Schedule for Completing Actions to Implement Long-Term Stability Solution

References: (1) Letter from K. S. Putnam (Boiling Water Reactor Owners' Group) to U. S. NRC, "Resolution of Reportable Condition for Stability Reload Licensing Calculations Using Generic Regional Mode DIVOM Curve," dated September 30, 2003

(2) Letter from K. R. Jury (AmerGen Energy Company, LLC) to U. S. NRC, "Request for License Amendment for Core Flow Operating Range Expansion and Oscillation Power Range Monitor (OPRM) Instrumentation," dated May 1, 2003

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Exelon Generation Company, LLC (EGC) and AmerGen Energy Company, LLC (AmerGen) are providing a schedule of commitments to complete actions to implement a long-term stability solution as requested in NRC Generic Letter 94-02, "Long-Term Solutions and Upgrade of Interim Operating Recommendations for Thermal-Hydraulic Instabilities in Boiling Water Reactors."

EGC and AmerGen have selected stability Option III as a long-term stability solution for the facilities listed above, using the Oscillation Power Range Monitor (OPRM) system. In Reference 1, the Boiling Water Reactor Owners' Group (BWROG) described a resolution to a reportable condition previously identified for stability reload licensing calculations. The reportable condition applied to power reactors implementing stability Option III as a long-term corrective action.

The resolution described in Reference 1 involves the use of plant-specific delta critical power ratio/initial critical power ratio vs. oscillation magnitude (DIVOM) curves, or the use of an alternate method, known as the detect and suppress solution – confirmation density (DSS-CD). Reference 1 states that the NRC has endorsed the BWROG resolution.

Based on this resolution, EGC and AmerGen are providing a schedule of commitments to submit license amendment requests to incorporate requirements for the stability solution into the Technical Specifications (TS) and make the systems operational. The attachment to this letter provides this schedule.

The attached schedule has been developed to implement the stability solution at the earliest opportunity for each facility, consistent with the following considerations.

- General Electric (GE) Company has methodologies capable of developing the DIVOM curves. However, the methodologies require enhancement, benchmarking, validation, and documentation. For all facilities except Clinton Power Station (CPS), GE will supply the plant-specific DIVOM curves and the setpoints for the OPRM systems. This will occur in time to support startup for the first unit to enter a refueling outage at each facility, beginning in fall 2004. The plant-specific setpoints are expected to be applicable to both units at each facility.

- For all facilities except CPS, the first unit at each facility (i.e., the unit starting up from the refueling outage) will activate the scram function of the OPRM systems following NRC approval of the license amendment requests and no earlier than 30 days following startup from the refueling outage. The remaining unit will activate the scram function within 30 days following the lead unit.

- In Reference 2, CPS submitted a license amendment request to adopt a maximum extended load line limit analysis "plus" (MELLLA +) and the DSS-CD solution. Since the MELLLA + analysis requires the use of DSS-CD, CPS will implement this solution as part of implementation of the MELLLA +

amendment request. Reference 2 discusses the requested approval date for this amendment request; therefore, no separate schedule for implementation of the OPRM system for CPS is provided in the attachment to this letter.

While EGC and AmerGen are confident that the GE activities described above can be accomplished in support of the attached schedule, there is the chance of unforeseen difficulties. EGC and AmerGen will monitor the GE activities closely to assure that results are being achieved as expected in accordance with established milestones. The NRC will be kept informed should difficulties arise that could impact the implementation dates attached.

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

Respectfully,

Keith R. Jury

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

Attachment

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

Attachment
Schedule for Completing Actions to Implement Long-Term Stability Solution

Action	Completion Date or Milestone
Submit license amendment request to NRC as follows:	
Dresden Nuclear Power Station (DNPS) and Quad Cities Nuclear Power Station (QCNPS) (combined submittal)	February 2004
Peach Bottom Atomic Power Station (PBAPS)	February 2004
LaSalle County Station (LCS)	March 2004
Limerick Generating Station (LGS)	May 2004
Activate Oscillation Power Range Monitor (OPRM) system scram function and declare system operable as follows:	
PBAPS, Unit 2	Following NRC approval of license amendment request and no earlier than 30 days after completion of refueling outage PB2R15, which is scheduled to complete in September 2004
PBAPS, Unit 3	Within 30 days after activation of OPRM at PBAPS, Unit 2
DNPS, Unit 3	Following NRC approval of license amendment request and no earlier than 30 days after completion of refueling outage D3R18, which is scheduled to complete in December 2004
DNPS, Unit 2	Within 30 days after activation of OPRM at DNPS, Unit 3
LCS, Unit 2	Following NRC approval of license amendment request and no earlier than 30 days after completion of refueling outage L2R10, which is expected to complete in February 2005
LCS, Unit 1	Within 30 days after activation of OPRM at LCS, Unit 2
LGS, Unit 2	Following NRC approval of license amendment request and no earlier than 30 days after completion of refueling outage LG2R08, which is expected to complete in March 2005
LGS, Unit 1	Within 30 days after activation of OPRM at LGS, Unit 2
QCNPS, Unit 1	Following NRC approval of license amendment request and no earlier than 30 days after completion of refueling outage Q1R18, which is expected to complete in March 2005
QCNPS, Unit 2	Within 30 days after activation of OPRM at QCNPS, Unit 1