

August 25, 2005

Mr. Christopher M. Crane, President
and Chief Nuclear Officer
Exelon Generation Company, LLC
4300 Winfield Road
Warrenville, IL 60555

SUBJECT: DRESDEN NUCLEAR POWER STATION, UNITS 2 AND 3 - ISSUANCE OF
AMENDMENTS RE: ISOLATION CONDENSER SURVEILLANCE
REQUIREMENTS (TAC NOS. MC5835 AND MC5836)

Dear Mr. Crane:

The Nuclear Regulatory Commission (Commission) has issued the enclosed Amendment No. 215 to Facility Operating License No. DPR-19 and Amendment No. 207 to Facility Operating License No. DPR-25 for Dresden Nuclear Power Station, Units 2 and 3. The amendments are in response to your application dated January 21, 2005.

The amendments modify the Isolation Condenser System heat removal capability surveillance requirement (SR) by adding a note to the technical specification Section SR 3.5.3.4. This note allows a delay of 12 hours after adequate reactor power is achieved to perform the test.

A copy of the Safety Evaluation is also enclosed. The Notice of Issuance will be included in the Commission's biweekly *Federal Register* notice.

Sincerely,

/RA/

Maitri Banerjee, Project Manager, Section 2
Project Directorate III
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket Nos. 50-237 and 50-249

Enclosures: 1. Amendment No. 215 to DPR-19
2. Amendment No. 207 to DPR-25
3. Safety Evaluation

cc w/encls: See next page

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DATE	8/25/05	6/6/05	06/23/05	6/30/05	7/19/05	8-25-05

OFFICIAL RECORD COPY

Dresden Nuclear Power Station, Units 2 and 3

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EXELON GENERATION COMPANY, LLC

DOCKET NO. 50-237

DRESDEN NUCLEAR POWER STATION, UNIT 2

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 215
License No. DPR-19

1. The Nuclear Regulatory Commission (Commission) has found that:
 - A. The application for amendment by the Exelon Generation Company, LLC (licensee) dated January 21, 2005, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment and paragraph 2.C.(2) of Facility Operating License No. DPR-19 is hereby amended to read as follows:

(2) Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No. 215, are hereby incorporated into this renewed operating license. The licensee shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of the date of its issuance and shall be implemented within 90 days of the date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

/RA/

Gene Y. Suh, Chief, Section 2
Project Directorate III
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical
Specifications

Date of Issuance: August 25, 2005

EXELON GENERATION COMPANY, LLC

DOCKET NO. 50-249

DRESDEN NUCLEAR POWER STATION, UNIT 3

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 207
License No. DPR-25

1. The Nuclear Regulatory Commission (Commission) has found that:
 - A. The application for amendment by the Exelon Generation Company, LLC (licensee) dated January 21, 2005, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment and paragraph 3.B. of Facility Operating License No. DPR-25 is hereby amended to read as follows:

B. Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No. 207, are hereby incorporated into this renewed operating license. The licensee shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of the date of its issuance and shall be implemented within 90 days of the date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION
/RA/

Gene Y. Suh, Chief, Section 2
Project Directorate III
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical
Specifications

Date of Issuance: August 25, 2005

ATTACHMENT TO LICENSE AMENDMENT NOS. 215 AND 207

FACILITY OPERATING LICENSE NOS. DPR-19 AND DPR-25

DOCKET NOS. 50-237 AND 50-249

Replace the following page of the Appendix "A" Technical Specifications with the attached page. The revised page is identified by amendment number and contain a marginal line indicating the area of change.

Remove Page

3.5.3-2

Insert Page

3.5.3-2

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 215 TO FACILITY OPERATING LICENSE NO. DPR-19
AND AMENDMENT NO. 207 TO FACILITY OPERATING LICENSE NO. DPR-25
EXELON GENERATION COMPANY, LLC
DRESDEN NUCLEAR POWER STATION, UNITS 2 AND 3
DOCKET NOS. 50-237 AND 50-249

1.0 INTRODUCTION

By application dated January 21, 2005, Exelon Generation Company, LLC (licensee, EGC) requested approval of changes to the Technical Specifications (TSs) for the Dresden Nuclear Power Station (DNPS) Units 2 and 3. The staff's original proposed no significant hazards consideration determination was published in the *Federal Register* on May 24, 2005 (70 FR 29793).

The proposed changes would revise the Isolation Condenser (IC) TS surveillance requirement SR 3.5.3.4 by adding a note. This note states that the IC system heat removal capability surveillance is not required to be performed until 12 hours after adequate reactor power is achieved to perform the test. This note is needed to allow performance of the surveillance test and to ensure IC system operability after an outage if maintenance or modifications were performed during the outage that could affect the IC heat removal capability. Traditionally, this test is performed during power operation, a necessary condition for the test, with a frequency of 60 months. However, during an upcoming outage of DNPS, Exelon is planning to conduct eddy current testing (ECT) of the IC tubes. Because some tubes may be plugged based on the ECT results, a post tube plug testing is required to demonstrate the decay heat removal capacity of the IC. At present, the TS prevents entering Modes 1, 2, or 3 if the surveillance test is required. The proposed addition of the note to the TS will allow the licensee to enter Modes 1, 2, or 3 without the surveillance test.

2.0 REGULATORY EVALUATION

The Commission's regulatory requirements that are related to the content of the TS are contained in Section 50.36 of Title 10 of the *Code of Federal Regulations* (10 CFR). The IC system is included in the TS in accordance with criterion 4 of 10 CFR 50.36(c)(2)(ii). Section 50.36(c)(3) requires that TS include surveillance requirements.

NUREG-1433, Revision 3, "Standard Technical Specifications, General Electric Plants, BWR/4," Revision 3, dated March 31, 2004, incorporates the general guidance regarding limiting conditions for operation scoping criteria set forth in the Commission's "Final Policy Statement on Technical Specification Improvement for Nuclear Power Reactors," Published in the *Federal Register* on July 23, 1993 (58 FR 39132) and incorporated in 10 CFR 50.36 effective August 18, 1995. Within this general framework, licensees may revise the TSs to

adopt current improved standard technical specification format and content provided that plant-specific review supports a finding of continued adequate safety.

The staff finds that the licensee in Section 5.2 of its submittal identified the applicable regulatory requirements.

3.0 TECHNICAL EVALUATION

The staff has reviewed the licensee's regulatory and technical analyses in support of its proposed license amendment which are described in Sections 5.0 and 4.0 of the licensee's submittal. The detailed evaluation below will support the conclusion that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

The IC system provides for decay heat removal from the reactor in the event that the reactor becomes isolated from the turbine and the main condenser. It is an Engineered Safety Feature System. The IC consists of two tube bundles immersed in a large water storage tank. The IC system operates by natural circulation. During operation of the IC, steam flows from the reactor, condenses in the tubes of the heat exchanger, and the condensate returns by gravity to the reactor. Automatic initiation occurs when reactor pressure exceeds about 1070 psig for more than 15 seconds.

10 CFR 50.36(c)(3) defines SR as "requirements relating to test, calibration, or inspection to assure that the necessary quality of systems and components is maintained, that the facility operation will be within safety limits, and that the limiting conditions for operation will be met." SR 3.5.3.4 verifies the capability of the IC system to remove the design decay heat. The IC system is designed for a heat removal rate of 252.5×10^6 BTU/HR. The system is required to be operable during Modes 1 (Run), 2 (Start-Up), and 3 (Hot Shutdown) with reactor pressure above 150 psig. If some of the condenser tubes are plugged during maintenance and testing, a heat removal capability surveillance is required before declaring the system to be operable. The reactor vessel supplies the heat load required during the surveillance test and the surveillance test can not be performed until adequate steam is available for the test. This requires the unit to be in Mode 1 (Run) and a power level between 60 to 75 percent reactor power as indicated in the plant procedures. The proposed addition of the note to the TS will allow the licensee to postpone the test for 12 hours. The proposed delay time of 12 hours is a reasonable time to stabilize the reactor operating conditions during the start-up.

In the current emergency core cooling system (ECCS) TS SR 3.5.1.7, the following note is included: "Not required to be performed until 12 hours after reactor steam pressure and flow are adequate to perform the test." This note is included in the ECCS TS to ensure that proper reactor operating conditions are available to complete the surveillance requirements. The proposed TS change follows the same approach the staff approved previously for the ECCS systems.

Before the start-up, the licensee will perform an engineering evaluation to assure that the required IC decay heat removal capability is available with margin. The licensee will then confirm the heat removal capability of the IC during power operation by performing TS SR

3.5.3.4 once the necessary reactor operating conditions are reached. The reactor will not be operated in Mode 1 without some assurance that the necessary safety functions could be met should a plant event occur.

If there is no IC system degradation, the heat removal capability surveillance test required by TS SR 3.5.3.4 is only performed once in 60 months.

The proposed addition of the note to TS SR 3.5.3.4 and the proposed addition to the corresponding Bases Section are acceptable as explained above.

4.0 STATE CONSULTATION

In accordance with the Commission's regulations, the State of Illinois official was notified of the proposed issuance of the amendment. The State official had no comments.

5.0 ENVIRONMENTAL CONSIDERATION

The amendments change a requirement with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20. The NRC staff has determined that the amendments involve no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendments involve no significant hazards consideration, and there has been no public comment on such finding (70 FR 29793). Accordingly, the amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendments.

6.0 CONCLUSION

The IC system heat removal capability test is being performed in an upcoming outage and will be repeated once in every 60 months. The methodology and the acceptance criteria for the surveillance test is not changed. The surveillance is still required to demonstrate the same heat removal capability. The proposed changes are acceptable since the proposed change does not alter the system or its operation. The staff reviewed the proposed change for compliance with 10 CFR 50.36 and agreement with the guidance set forth in NUREG-1433. The staff concludes that the proposed change to the DNPS, Units 2 and 3 TS are acceptable.

The Commission has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendments will not be inimical to the common defense and security or to the health and safety of the public.

7.0 REFERENCES

Letter from P. Simpson, Exelon Generating Company LLC to US Nuclear Regulatory Commission "Request for Amendment to Technical Specifications Associated with Isolation Condenser System Heat Removal Capability Surveillance," dated January 21, 2005.

Principal Contributor: George Thomas, SRXB/DSSA
301-415-1814

Date: August 25, 2005