

August 10, 2006

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 - REQUEST FOR
ADDITIONAL INFORMATION RELATED TO LICENSE AMENDMENT
REQUEST TO REVISE TECHNICAL SPECIFICATION SURVEILLANCE
REQUIREMENT 3.4.3.1 AND 3.1.7.10 (TAC NOS. MD2166 AND MD2167)

Dear Mr. Crane:

By letter to the Nuclear Regulatory Commission (NRC) dated June 2, 2006, Exelon Generation Company, LLC submitted a request to revise Technical Specification (TS) Surveillance Requirement (SR) 3.4.3.1 and SR 3.1.7.10, for the Dresden Nuclear Power Station, Units 2 and 3. Specifically, the request proposes to change TS SR 3.4.3.1, to increase the allowable as-found main steam safety valve (MSSV) lift setpoint tolerance and TS SR 3.1.7.10, to increase the enrichment of sodium pentaborate used in the standby liquid control system.

The NRC staff is reviewing your submittal and has determined that additional information is required to complete the review. The specific information requested is addressed in the enclosure to this letter. During a discussion with your staff on July 25, 2006, it was agreed that you would provide a response within 30 days from the date of this letter.

The NRC staff considers that timely responses to requests for additional information help ensure sufficient time is available for staff review and contribute toward the NRC's goal of efficient and effective use of staff resources. If circumstances result in the need to revise the requested response date, please contact me at (301) 415-2277.

Sincerely,

/RA/

Maitri Banerjee, Senior Project Manager
Plant Licensing Branch III-2
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-237 and 50-249

Enclosure:
Request for Additional Information

cc w/encl: See next page

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Dresden Nuclear Power Units 2 and 3

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REQUEST FOR ADDITIONAL INFORMATION

DRESDEN NUCLEAR POWER STATION, UNITS 2 AND 3

DOCKET NOS. 50-237 AND 50-249

In reviewing the Exelon Generation Company LLC's (Exelon's) submittal dated June 2, 2006, related to a license amendment request to revise Technical Specification (TS) Surveillance Requirement (SR) 3.4.3.1 and SR 3.1.7.10, to increase the allowable as-found main steam safety valve (MSSV) lift setpoint tolerance and to increase the enrichment of sodium pentaborate used in the standby liquid control system (SLCS), for the Dresden Nuclear Power Station, Units 2 and 3, the NRC has determined that the following information is needed in order to complete its review:

1. The final paragraph of GE-NE-0000-0053-8435-R1P, page 6-5, states, "Exelon will ensure that the 10CFR50.62 [sic] requirement to inject 86 GPM [gallons per minute] of 13% sodium pentaborate solution, or the equivalent, plus the ATWS [anticipated transient without scram] specific injection requirements stated in Section 3.0 of this report are met for injection against the maximum reactor vessel pressure of 1301 psig at the SLCS sparger occurring during an ATWS event when the SLCS is in operation without opening of the SLCS relief valve." However, TS SR 3.1.7.7 requires a discharge pressure of 1275 psig for each pump. Explain the disparity in discharge pressure between the General Electric (GE) maximum and the SR. Also explain why TS SR 3.1.7.7 should not be revised to reflect the higher discharge pressure. (Category 2.a)
2. Figure 3-8 of same report provides the bounding pressure against which SLCS must inject. Please provide the figure with reactor vessel lower plenum pressure scaled in psig. (Category 2.c)

ENCLOSURE

RAI CATEGORIES

(Select only one, most dominant category for each RAI question)

1. More information is needed because of:
 - a. complexity of request
 - b. first-of-a-kind nature of request
 - c. NRC change in regulatory significance or focus
 - d. NRC questions on previously used methodology or guidance
 - e. licensee change to previously used methodology
 - f. licensee reduction in current safety margin

2. The review can not be completed without additional explanation or clarification of:
 - a. input variables or analytical assumptions
 - b. methodology used or results obtained
 - c. applicability or bounding nature of third party analyses or data correlations
 - d. differences from NRC guidance documents (SRP, RG, etc.)
 - e. no significant hazards consideration discussion
 - f. environmental considerations discussion
 - g. applicable regulatory requirements discussion
 - h. information that appears to be incorrect and needs to be corrected
 - i. response to previous RAI appears inadequate

3. Reviewer requesting information even though the question is, or the question asks for:
 - a. not directly related to the request
 - b. inconsistent with applicable codes, standards, RGs, or SRP sections
 - c. information accessible from readily available sources and was explicitly referenced
 - d. information does not appear needed given the precedent cases discussed in the request
 - e. information that is not safety significant or pertinent to the regulatory finding
 - f. information that is known to engineers who work in the general technical area
 - g. going beyond the current licensing basis and doesn't need to be asked
 - h. a formal commitment

4. Other (please specify)