

RS-10-022
February 4, 2010

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

Dresden Nuclear Power Station, Units 1, 2 and 3
Facility Operating License No. DPR-2 (Renewed) DPR 19 and DPR 25
NRC Docket Nos. 50-010, 50-237, 50-249 and 72-37

Quad Cities Nuclear Power Station, Units 1 and 2
Renewed Facility Operating License Nos. DPR-29 and DPR-30
NRC Docket Nos. 50-254, 50-265, and 72-53

Subject: Response to NRC's Request for Disposition of Non-Helium Leak Tested Holtec Multi-Purpose Canisters (MPCs) as Discussed in EA-09-190, "Exercise of Enforcement Discretion – Holtec International"

Based on a telephone conversation with the NRC on December 01, 2009, Exelon Generation Company, LLC (EGC) is submitting this letter to formally document the information regarding the Holtec Multi-Purpose Canisters (MPCs) that have been loaded without the receipt of the required helium leak test specified in the Holtec HI-STORM Final Safety Analysis Report (FSAR). EGC is providing the information requested for maximum heat load and the radiological effects due to the subject MPCs in storage at the Independent Spent Fuel Storage Installations (ISFSIs) and entry into, and resolution of the issue in EGC's Corrective Action Process (CAP).

Dresden Nuclear Power Station

Dresden Nuclear Power Station (DNPS) has reviewed the spent fuel loading records and determined that the heat loads for the subject MPCs is in the range of 8.6 kW to 10.9 kW, which is well below the 21 kW threshold discussed in the December 01, 2009, telephone conversation. DNPS has also reviewed the records for offsite dose as calculated in accordance with the methodology described in the DNPS Offsite Dose Calculation Manual (ODCM) and has confirmed that the dose to the public from the ISFSI is insignificant.

In accordance with EGC procedure LS-AA-125, "Corrective Action Process (CAP) Procedure," the subject issue was entered into the EGC CAP on August 06, 2009, under Issue Report (IR) 00950564. As a result of the corrective action process, an Operability Determination was prepared and approved on August 11, 2009, which included the heat load and radiological effects addressed above, and determined that the subject MPCs are operable.

Quad Cities Nuclear Power Station

Quad Cities Nuclear Power Station (QCNPS) has reviewed the spent fuel loading records and determined that the heat loads for the subject MPCs is in the range of 10.0 kW to 13.1 kW, which is well below the 21 kW threshold discussed in the December 01, 2009, telephone conversation. QCNPS has also reviewed the records for offsite dose as calculated in accordance with the methodology described in the QCNPS ODCM and has confirmed that the dose to the public from the ISFSI is insignificant.

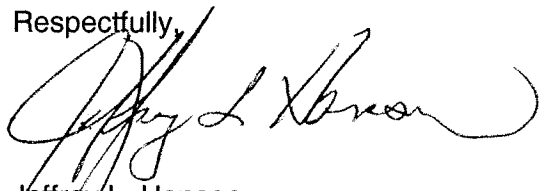
In accordance with Exelon procedure LS-AA-125, the subject issue was entered into the EGC CAP on August 06, 2009, under IR 00950556. As a result of the corrective action process, an Operability Determination was prepared and approved on August 11, 2009, which included the heat load and radiological effects addressed above, and determined that the subject MPCs are operable.

Additionally, EGC has recently received information from Holtec regarding helium leak testing that was performed on over 100 unloaded MPCs. This testing was performed on unloaded MPCs that have been deployed to utility sites and those that remain at Holtec Manufacturing Division. These MPCs did not originally receive the factory helium leak test, but when tested, all of these MPCs were found to meet the ANSI N14.5-1997 leak test criterion. This information demonstrates, with high probability and confidence levels, that there is a degree of package containment sufficient to preclude any significant release of radioactive materials. Accordingly, these casks are bounded by the existing EGC evaluations for compliance with 10 CFR 72.104, "Criteria for radioactive materials in effluents and direct radiation from an ISFSI or MRS."

EGC looks forward to written communication from the NRC regarding our response.

If you have any questions about this letter, please contact me at (630) 657-2833.

Respectfully,



Jeffrey L. Hansen
Manager – Licensing and Regulatory Affairs