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October 7, 1992

Dr. Thomas E. Murley, Director
Office of Nuclear Reactor Regulation
Nuclear Regulatory Commission
Washington, DC 20555

Attention: Document Control Desk

Subject: Dresden Nuclear Power Station Unit 2
Cycle 13 Coastdown
NRC Docket No. 50-237

- References:
- (1) Letter, A.C. Thadani to R.A. Copeland, "Acceptance for Referencing of Topical Report ANF-1125(P) and Supplement 1, 'ANFB Critical Power Correlation'," March 8, 1980
 - (2) Letter, A.C. Thadani to R.A. Copeland, "Acceptance for Referencing of Licensing Topical Report ANF-913, 'CONTRANSA2: A Computer Program for Boiling Water Reactor Transient Analyses'," May 23, 1990.
 - (3) Letter, A.C. Thadani to R.A. Copeland, "Acceptance for Referencing of Topical Report ANF-524(P) Revision 2, 'ANF Critical Power Methodology for Boiling Water Reactors'," August 8, 1990.
 - (4) Letter, A.C. Thadani to R.A. Copeland, "Acceptance for Referencing of Topical Report XN-NF-80-19(P), Volume 1, Supplement 3, 'Advanced Nuclear Fuels Methodology for Boiling Water Reactors; Benchmark Results for the CASMO-3G/MICROBURN-B Calculational Methodology'," August 13, 1990.

Dr. Murley:

This letter provides information concerning Commonwealth Edison Company's (CECo) intentions to use a generic coastdown analysis performed by Siemens Power Corporation (SPC) for the current Dresden Unit 2 operating cycle, Cycle 13, and subsequent Dresden reloads. No changes in the Technical Specifications or Core Operating Limits Report (COLR) are required, and CECo anticipates no unreviewed safety questions. The 10CFR50.59 Safety Evaluation of the SPC analysis is currently in progress will be completed before Unit 2 exceeds its licensed exposure value in mid-November.

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Siemens is responsible for the cycle reload licensing analyses at Dresden. Each cycle, Siemens evaluates the limiting pressurization events at the projected end-of-cycle, where scram reactivity and power shape effects are most limiting. Typically, Siemens establishes a conservative end-of-cycle (EOC) exposure to account for any planned coastdown and any nominal variations in operating capacity factor. This projected EOC exposure value currently forms an upper bound for cycle exposure unless additional analysis is performed. Should outage schedules change significantly, extending cycle operation beyond the established EOC exposure, subsequent analyses are necessary to ensure the COLR limits remain bounding.

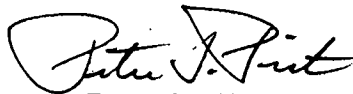
Originally, D2C13 was scheduled to shutdown for refueling in September, 1992. However, the Unit 2 shutdown date was moved from September, 1992 to January, 1993. CECo therefore requested that Siemens provide an appropriate analysis before the unit would exceed its licensed exposure (24,364 MWD/MTU). The current EOC exposure projected for January 18, 1993 is 25,295 MWD/MTU.

Siemens used their advanced methodology package to perform the generic coastdown study. They include CASMO-3G/MICROBURN-B, COTRANSA2, XCOBRA, XCOBRA-T with the ANFB Critical Power Correlation, and RODEX2. Although these methods are not yet referenced in the current Unit 2 Technical Specifications, they have been generically approved by the NRC in References 1-4. In addition, an administrative Technical Specification change has previously been submitted to reference the Siemens advanced methodology package in the Unit 2 Technical Specifications, Section 6, in support of the upcoming Cycle 14. This amendment mirrors the current Unit 3 Section 6 and is expected to be approved prior to Unit 2 Cycle 14 startup.

The generic analysis does not necessitate any changes to the Unit 2 COLR limits because it confirms that the full power limits are applicable to coastdown operation as expected. This is consistent with previous coastdown studies by General Electric. Although Edison has not yet completed its review of the Siemens generic coastdown analysis, no unreviewed safety questions are anticipated. The coastdown analysis is not used to determine COLR limits, only to verify they may still be used. Therefore, no changes to Section 6 are needed. Since no changes to the Technical Specifications are necessary, CECo believes that application of 10CFR50.59 is appropriate and that prior review and approval by the NRC staff is not necessary for the Siemens analysis.

Please contact this office should further information be needed.

Sincerely,



Peter L. Piet

Nuclear Licensing Administrator

cc: A.B. Davis - Regional Administrator, Region III
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