



Commonwealth Edison
1400 Opus Place
Downers Grove, Illinois 60515

10 CFR 50.90

June 2, 1993

Dr. Thomas E. Murley, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Attn: Document Control Desk

Subject: Dresden Nuclear Power Station Units 2 and 3
Application to Amendment to Facility Operating
Licenses DPR-19 and DPR-25;
Appendix A, Technical Specifications
NRC Docket Nos. 50-237 and 50-249

Reference:(a) C. P. Patel letter to T.J. Kovach, dated March 22, 1993.

Dear Dr. Murley:

Pursuant to 10 CFR 50.90, Commonwealth Edison (CECo) proposes to amend Appendix A, Technical Specification, of Facility Operating Licenses DPR-19 and DPR-25. The purpose of this amendment request is to include CECo's Topical Report NFSR-0091, in Section 6.6 of the Technical Specifications. Topical Report NFSR-0091 has been recently approved by the NRC staff as documented in Reference (a). CECo requests approval of this amendment request prior to November 1, 1993. It is requested that the proposed changes be made effective 45 days after approval.

This proposed amendment is subdivided as follows:

1. Attachment A gives a description and safety analysis of the proposed changes in this amendment.
2. Attachments B and C include the marked-up Technical Specification pages with the requested changes indicated for Dresden Station Units 2 and 3 respectively.
3. Attachment D describes CECo's evaluation performed in accordance with 10 CFR 50.92(c), which confirms that no significant hazards consideration is involved.
4. Attachment E provides the Environmental Assessment.

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The proposed amendment has been reviewed and approved by CECo On-Site and Off-Site Review committees in accordance with company procedures.

To the best of my knowledge and belief, the statements contained above are true and correct. In some respect these statements are not based on my personal knowledge, but obtained information furnished by other Commonwealth Edison employees, contractor employees, and consultants. Such information has been reviewed in accordance with company practice, and I believe it to be reliable.

Commonwealth Edison is notifying the State of Illinois of this application for amendment by transmitting a copy of this letter and its attachment to the designated state official.

Please direct any questions you may have concerning this submittal to this office.

Sincerely,



Peter L. Piet
Nuclear Licensing Administrator

Attachments:

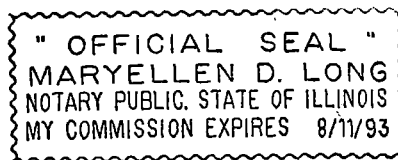
- A. Description of Safety Analysis of the Proposed Changes
- B. Marked-up Technical Specification Page for Dresden Unit 2
- C. Marked-up Technical Specification Page for Dresden Unit 3
- D. Evaluation of Significant Hazards Consideration
- E. Environmental Assessment

cc: A.B. Davis - Regional Administrator, RIII
M.N. Leach - Senior Resident Inspector - DNPS
J.F. Stang - NRR, Project Manager - Dresden
Office of Nuclear Facility Safety - IDNS

Signed before me on this 2nd day

of June, 1993,

by Maryellen D. Long
Notary Public



Attachment A

Description of Amendment Request

Introduction

The NRC has reviewed Commonwealth Edison Company (CECo) Topical Report NFSR-0091, including Supplements 1 and 2 and additional comparisons to vendor results (References 1, 2, 3, and 4, respectively). This Topical Report establishes Edison as a qualified user of the Siemens Power Corporation (SPC) neutronics methodology currently described in XN-NF-80-19 (Reference 5) and applied at Dresden Station. This amendment request is an administrative change to add the Edison Topical Report to the list of approved methodologies referenced in Section 6.6 of the Technical Specifications for Dresden Station. This will enable CECo to use the SPC methodology for the licensing grade calculations required to determine the cycle specific limits in the Core Operating Limits Report (COLR). The NRC has approved NFSR-0091 and its associated supplements in Reference 6.

CECo plans on using the methodology in the design and fuel management of future reloads of Dresden Station. References 2 and 4 have provided comparisons of CECo versus vendor generated results for previous analyses of record; with the Reference 6 NRC SER documenting acceptability of Edison's analyses within the limitations identified. Upon approval of this amendment, Edison will perform the analyses required to determine the core operating limits, as discussed in Section 6.6 of the Technical Specifications, starting with the Dresden Unit 3 Cycle 14 reload licensing analyses.

Description and Basis of Request

SPC currently performs the reload licensing calculations for Dresden Station using the methodology described in Reference 5. Edison submitted a Topical Report (References 1 through 4) to the NRC and obtained approval to perform the neutronic licensing calculations for the reloads. The remaining analyses for items such as pressurization events, stability margins, and Loss of Coolant Accident will continue to be performed by the fuel vendor until such time that CECo may request and receive approval to perform them. To allow CECo to perform the neutronic licensing calculations, the Edison Topical Report NFSR-0091 and its associated supplements (References 2 and 3) is being added to Section 6.6 of the Technical Specifications of each unit. Edison requests that this amendment be issued to support the Dresden Unit 3 Cycle 14 design schedule. There are no other Technical Specification changes required.

A. Minimum Critical Power Ratio Safety Limit

The CECo analyses are to be performed with the same computer codes and methods as used by SPC. Therefore, there is no impact on the MCPR Safety Limit attributable to CECo personnel performing the neutronic licensing calculations in lieu of SPC.

B. Other Core Limits

Cycle specific updates to future Core Operating Limit Reports (COLRs) and Core Monitoring software inputs will be generated by Edison using the SPC methodology described in Reference 5. For example, the Linear Heat Generation Rate (LHGR) limit is a thermal-mechanical limit determined by SPC and will continue to be incorporated per SPC's recommendations into the COLR of each unit. The MAPLHGR limit is a composite limit, consisting of the most limiting of either the LOCA-ECCS limit or the fuel mechanical integrity curve. The calculations for the MAPLHGR curve will continue to be performed by SPC.

As demonstrated by the benchmark comparisons in References 1, 2, and 3, the calculation of the above parameters will have no adverse effect on the validity of the cycle specific limits or associated surveillance calculation.

Summary

Based on the above discussion, CECo proposes to revise Technical Specification Section 6.6 of Dresden Units 2 and 3 to include the Edison Topical Report NFSR-0091 and its supplements. The proposed revisions for these amendments are presented in Attachments B and C for Dresden Unit 2 and Dresden Unit 3, respectively.

Schedule

CECo requests approval of the proposed change no later than November 1, 1993 (prior to D3R13) to avoid incurring the cost of additional analysis currently performed by the fuel vendor.

References

1. Letter, P. L. Piet to T. E. Murley (NRC), "Dresden Station Units 2 and 3, Quad Cities Station Units 1 and 2, LaSalle County Station Units 1 and 2, Topical Report for Neutronics Methods for BWR Reload Design Using CASMO/MICROBURN", December 31, 1991.
2. Letter, P. L. Piet to T. E. Murley (NRC), "Dresden Station Units 2 and 3, Quad Cities Station Units 1 and 2, LaSalle County Station Units 1 and 2, Topical Report for Neutronics Methods for BWR Reload Design", March 24, 1992.
3. Letter, P. L. Piet to T. E. Murley (NRC), "Dresden Station Units 2 and 3, Quad Cities Station Units 1 and 2, LaSalle County Station Units 1 and 2, Topical Report for Neutronics Methods for BWR Reload Design", May 22, 1992.
4. Letter, P. L. Piet to T. E. Murley (NRC), "Dresden Station Units 2 and 3, Quad Cities Station Units 1 and 2, LaSalle County Station Units 1 and 2, Topical Report for Neutronics Methods for BWR Reload Design", January 20, 1993.
5. XN-NF-80-19(P)(A), "Exxon Nuclear Methodology for Boiling Water Reactors".
6. C. P. Patel (NRC) to T. J. Kovach (CECo), "Commonwealth Edison Topical Report NFSR-0091 'Benchmark of CASMO/MICROBURN BWR Nuclear Design Methods' (TAC No. M82731)", dated March 22, 1993.