

**Attachment B**

**Proposed Changes to Appendix A,**

**Technical Specifications, of Facility Operating License DPR-19**

**Dresden Unit 2**

Revised Page: 6-19

9306080270 930602  
PDR ADOCK 05000237  
P PDR

6.0 ADMINISTRATIVE CONTROLS (Cont'd.)

4. Core Operating Limits Report

- a. Core operating limits shall be established and documented in the Core Operating Limits Report before each reload cycle or any remaining part of a reload cycle for the following:
- 1) The Control Rod Withdrawal Block Instrumentation for Table 3.2-3 of Specification 3.2.C.
  - 2) The Average Planar Linear Heat Generation Rate (APLHGR) Limit and associated APLHGR multipliers for Specifications 3.5.I, 3.5.D.2, and 3.6.H.3.f.
  - 3) The Local Steady State Linear Heat Generation Rate (LHGR) for Specification 3.5.J.
  - 4) The Local Transient Linear Heat Generation Rate (LHGR) for Specification 3.5.K.
  - 5) The Minimum Critical Power Operating Limit for Specification 3.5.L. This includes rated and off-rated flow conditions.
- b. The analytical methods used to determine the core operating limits shall be those previously reviewed and approved by the NRC in the latest approved revision or supplement of the topical reports describing the methodology. For Dresden Unit 2, the topical reports are:
- 1) ANF-1125(P)(A), "Critical Power Correlation - ANFB." *je*
  - 2) ANF-524(P)(A), "ANF Critical Power Methodology for Boiling Water Reactors." *je*
  - 3) XN-NF-79-71(P)(A), "Exxon Nuclear Plant Transient Methodology for Boiling Water Reactors".
  - 4) XN-NF-80-19(P)(A), "Exxon Nuclear Methodology for Boiling Water Reactors".
  - 5) XN-NF-85-67(P)(A), "Generic Mechanical Design for Exxon Nuclear Jet Pump Boiling Water Reactors Reload Fuel".
  - 6) XN-NF-81-22(P)(A), "Generic Statistical Uncertainty Analysis Methodology".
  - 7) ANF-913(P)(A), "COTRANSA2: A Computer Program for Boiling Water Reactor Transient Analyses." *je*

INSERT 'A'



INSERT A

- 8) Commonwealth Edison Company Topical Report NFSR-0091,  
"Benchmark of CASMO/MICROBURN BWR Nuclear Design Methods",  
and associated Supplements on Neutronic Licensing Analyses (Supplement 1)  
and La Salle County Unit 2 Benchmarking (Supplement 2).

**Attachment C**

**Proposed Changes to Appendix A,**

**Technical Specifications, of Facility Operating License DPR-25**

**Dresden Unit 3**

Revised Page: 6-19

## 6.0 ADMINISTRATIVE CONTROLS (Cont'd.)

- 3) The Local Steady State Linear Heat Generation Rate (LHGR) for Specification 3.5.J.
  - 4) The Local Transient Linear Heat Generation Rate (LHGR) for Specification 3.5.K.
  - 5) The Minimum Critical Power Operating Limit for Specification 3.5.L. This includes rated and off-rated flow conditions.
- b. The analytical methods used to determine the core operating limits shall be those previously reviewed and approved by the NRC in the latest approved revision or supplement of the topical reports describing the methodology. For Dresden Unit 3, the topical reports are:
- 1) ANF-1125(P)(A), "Critical Power Correlation - ANFB." *fe*
  - 2) ANF-524(P)(A), "ANF Critical Power Methodology for Boiling Water Reactors." *fe*
  - 3) XN-NF-79-71(P)(A), "Exxon Nuclear Plant Transient Methodology for Boiling Water Reactors."
  - 4) XN-NF-80-19(P)(A), "Exxon Nuclear Methodology for Boiling Water Reactors."
  - 5) XN-NF-85-67(P)(A), "Generic Mechanical Design for Exxon Nuclear Jet Pump Boiling Water Reactors Reload Fuel."
  - 6) XN-NF-81-22(P)(A), "Generic Statistical Uncertainty Analysis Methodology."
  - 7) ANF-913(P)(A), "COTRANSA2: A Computer Program for Boiling Water Reactor Transient Analyses." *fe*
- c. The core operating limits shall be determined so that all applicable limits (e.g., fuel thermal-mechanical limits, core thermal-hydraulic limits, ECCS limits, nuclear limits such as shutdown margin, and transient and accident analysis limits) of the safety analysis are met.
- d. The Core Operating Limits Report, including any mid-cycle revisions or supplements thereto, shall be provided upon issuance to the NRC Document Control Desk with copies to the Regional Administrator and Resident Inspector.

INSERT 'A'

### B. Reportable Events

Reportable events will be submitted as required by 10 CFR 50.73.

INSERT A

- 8) Commonwealth Edison Company Topical Report NFSR-0091,  
"Benchmark of CASMO/MICROBURN BWR Nuclear Design Methods",  
and associated Supplements on Neutronic Licensing Analyses (Supplement 1)  
and La Salle County Unit 2 Benchmarking (Supplement 2).

## Attachment D

### Evaluation of Significant Hazards Consideration

Commonwealth Edison Company (Edison) proposes an amendment to Facility Operating Licenses DPR-19 and DPR-25 to include the Edison Topical Report NFSR-0091 which, having been approved by the NRC, will allow Edison to perform neutronic licensing calculations. As discussed in Attachment A, Description of Amendment Request, Edison proposes to reference the Edison Topical Report (and related Supplements) in the Technical Specifications of Dresden Station.

Edison has evaluated the proposed amendment and concluded that it does not involve a significant hazards consideration. In accordance with 10CFR50.92(c):

- The proposed amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated.

The Topical Report methodology to be referenced in the Technical Specifications is approved by the NRC and is used to evaluate reload designs and related core operating limits. Edison performing these analyses instead of the fuel vendor does not introduce physical changes to the plants which would involve a significant increase in the probability or consequences of an accident previously evaluated. The methodology is the same as is currently being used at Dresden Station. Edison will continue to analyze the same spectrum of limiting events for each reload, and an Interaction Procedure with the fuel vendor has been implemented to ensure the interface between the two organizations is working properly. The MCPR Safety Limit is assessed by the fuel vendor on a cycle by cycle basis to confirm its continued applicability. The fuel vendor will continue this assessment based on the specific core conditions provided by Edison. Therefore, the MCPR Safety Limit will continue to maintain fuel cladding integrity by ensuring that 99.9% of the fuel rods will avoid transition boiling during limiting anticipated operational occurrences. Thus, the changes do not affect the probability or consequences of accidents previously analyzed.

- The proposed amendment does not create the possibility of a new or different kind of accident from any accident previously evaluated.

The referenced methodology is the same as that currently used to analyze in-core fuel management and neutronic licensing events and therefore does not introduce any physical changes to the plant which would create the possibility of a new or different kind of accident from any accident previously evaluated. Similarly, the statistical basis of the MCPR Safety Limit has not been impacted as demonstrated by the Topical and Supplements. The safety limit will therefore continue to maintain fuel cladding integrity during limiting anticipated operational occurrences. Therefore, the possibility of a new or different kind of accident is not created.

- The proposed amendment does not involve a significant reduction in a margin of safety.

Since the Edison methodology is consistent with the currently approved neutronic methods for Dresden, it will continue to ensure fuel design and licensing criteria are met. The MCPR Safety Limit will continue to be based on the value specified by the fuel vendor, which is assessed on a cycle by cycle basis to ensure continued applicability. Therefore, the margin of safety between the MCPR Safety Limit and potential fuel failure after the onset of transition boiling is not decreased.

The limits based on mechanical design and LOCA considerations will continue to be specified by the fuel vendor (LHGR and MAPLHGR). Therefore, this proposed administrative change has no adverse impact on any margin of safety.

## Attachment E

### Environmental Assessment Statement Applicability Review

The proposed amendment to the Dresden Units 2 and 3 Technical Specifications reflects the use of the NRC approved Edison Topical Report NFSR-0091 and its associated supplements. The methodologies are the same as are currently in use at Dresden Station. Therefore, the current margin of safety and fuel cladding integrity will be maintained so that no environmental impact will result.

Commonwealth Edison has evaluated the proposed changes against the criteria for the identification of licensing and regulatory actions requiring environmental assessment in accordance with 10 CFR 51.20. It has been determined that the proposed changes meet the criteria for a categorical exclusion as provided under 10 CFR 51.22(c)(9). This conclusion has been determined because the proposed changes do not pose a significant hazards consideration or do not involve a significant increase in the amounts, and no significant changes in the types, of effluents that may be released offsite. This request does not involve a significant increase in individual or cumulative occupational radiation exposure. Therefore, the Environmental Assessment Statement requirement is not applicable for these changes.