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ComEd

September 15, 1997

United States Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D.C. 20555

Subject: **Revision to ComEd Response to Generic Letter 94-02, BWR Stability**
LaSalle County Station, Units 1 and 2
Facility Operating License NPF-11 and NPF-18,
Quad Cities Station, Units 1 and 2
Facility Operating License DPR-29 and DPR-30,
Dresden Nuclear Power Station, Units 2 and 3
Facility Operating License DPR-19 and DPR-25
NRC Docket Nos. 50-373/374, 50-254/265 and 50-237/249

References:
1. NRC Generic Letter 94-02, "Long-Term Solutions and Upgrade of Interim Operating Recommendations for Thermal-Hydraulic Instabilities in Boiling Water Reactors", dated July 11, 1994
2. J. Brons letter to W. Russell, dated September 9, 1994 transmitting Dresden, Quad Cities, and LaSalle County Stations "Response to Generic Letter 94-02 (BWR Stability)."
3. W.T. Subalusky letter to U.S. NRC, dated August 1, 1997, transmitting "Revision to ComEd response to Generic Letter 94-02 (BWR Stability)."

The purpose of this letter is to describe the approach ComEd is taking to the BWR Core Stability issue at our three BWR sites. ComEd is taking a common project approach to the instability issue. A project team has been formed that consists of individuals from all three sites, corporate, ABB and S&L, and a consultant who participated in the ABB/BWR Owners' Group design effort. Taking a common approach to this project has the following advantages:

1. The design cost is minimized.
2. It allows implementation of lessons learned from ComEd and the industry.
3. An installation team will be formed that can install the mod at all three sites.
4. It facilitates installation of the modification at Dresden and Quad Cities within a 40 day outage.
5. Operator distractions such as nuisance alarms can be minimized through experience.
6. Development of procedures and training can be bundled among the three sites.

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A key element in this approach is the scheduling and sequencing of the installation of the modification at the sites. The current schedule for installation is as follows:

• LaSalle partial installation on Unit 2	Complete
• LaSalle partial installation on Unit 1	Current L1F35
• LaSalle complete installation on Unit 2	Current L2R07
• Quad Cities installation on Unit 1	Q1R15 - (Currently scheduled to start in September, 1998)
• LaSalle complete installation on Unit 1	L1R08 - (Currently scheduled to start in late 1998 or early 1999)
• Dresden installation on Unit 3	D3R15 - (Currently scheduled to start in January, 1999)
• Quad Cities installation on Unit 2	Q2R15 - (Currently scheduled to start in February, 1999)
• Dresden installation on Unit 2	D2R16 - (Currently scheduled to start in November, 1999) (See discussion below)

The schedule for implementing this approach is adjusted from that described in the Reference 2 letter in that the Dresden Unit 2 installation is deferred one cycle, and the time during which the Quad Cities and Dresden units will run with the modification installed but with the scram initiation disabled is increased from six months to one cycle, consistent with the current LaSalle commitment and industry practice.

This change to the installation schedule for Dresden Station does not affect the level of safety of the station. The most recent BWR Owners' Group interim actions have been implemented at each ComEd BWR. These actions including detailed procedural guidance and training, have proven successful at avoiding onset of instability in recent years.

The Dresden Unit 2 installation date of D2R16 scheduled for November, 1999, is a change to our previous commitment as described in Reference 2. Our original committed date for Dresden Unit 2 was D2R15, scheduled for March, 1998. The scheduled date for installation of the modification on Dresden Unit 2 has been changed to allow installation with an experienced installation team, incorporation of lessons learned from the complete installation at LaSalle, and installation at Dresden within a 40 day outage. Also, Dresden is in the process of procuring old cabinets that can be modified and used as a mock up for installation and training. The procurement and preparation of the mock up may not support training for D2R15 installation in March, 1998.

In addition, there are competing priorities for the resources available to Dresden Station, and for the outage time available. As an example, Dresden has determined that establishing a modern, 3-element feedwater level control system on Unit 2 is one of the highest priorities for Dresden Station. Upgrading the feedwater level control system will provide immediate benefit by reducing challenges to both the operators and plant.

In addition to the above mentioned change to the schedule for installation of the BWR Stability modification, the time during which the units will be operated with the scram initiation bypassed is being adjusted for Quad Cities and Dresden Stations. The units will be operated for one cycle with the alarm fully functional, but with the scram initiation bypassed. This will provide a sufficient time frame to identify and correct unit-specific problems without risking cycling the unit through an unnecessary scram. The BWR Owners' Group interim actions will be used during the interim period when the scram initiation is disabled. This time frame is consistent with LaSalle County Station and other utilities' plans for similar installations.

To the best of my knowledge and belief, the statements contained in this document are true and correct.

If there are any questions concerning this letter, please contact this office.

Respectfully,

John Hosmer

John Hosmer
Engineering Vice President

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