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JSPLTR: #97-0156

October 3, 1997

U.S. Nuclear Regulatory Commission
Washington, D.C. 20555
Attn: Document Control Desk

Subject: Dresden Nuclear Power Station Units 2 and 3
**Elimination of Main Steam Line Valve Closure and Scram Function
Related to Main Steam Line Radiation Monitor**
NRC Docket Nos. 50-237/249

- Reference: (a) J. S. Perry letter to USNRC dated March 5, 1997, Elimination of Main Steam Line Valve Closure and Scram Function Related to Main Steam Line Radiation Monitor.
- (b) NEDO-31400(a), Safety Evaluation for Eliminating the Boiling Water Reactor Main Steam Line Isolation Valve Closure Function and Scram Function of the Main Steam Line Rad Monitor, dated October 1992

In the Reference (a) submittal, ComEd proposed changes to the Technical Specification that removed the Main Steam Line High Radiation scram and Main Steam Line High Radiation isolation functions. The proposed changes were prepared in accordance with the Reference (b) NRC approved topical report, which provided the Staff's conditions for applying the generic evaluation to a plant specific application.

During the review of the subject license amendment, the Staff could not determine if one of the conditions was fully met. Specifically, condition 1, as provided in Reference (b) states:

"The applicant demonstrates that the assumptions with regard to input values (including power per assembly, Chi/Q, and decay times) that are made in the generic analysis bound those for the plant."

As requested by the Staff, ComEd has confirmed that the assumptions made in the NEDO-31400 generic analysis bound those for Dresden. The following table provides information regarding power per assembly and decay times. The assumptions relating to Chi/Q were provided adequately to the Staff in Reference (a).

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Item	NEDO-31400	Dresden
<i>Power Per Assembly</i>	0.12 MW/rod	0.086 MW/rod ^(a)
<i>Decay Times</i>		
Krypton	20 Hours ^(b)	19.4 Hours
Xenon	15 Days	14.6 Days

- (a) Based on full core of 8X8 fuel (conservative), 1.5 power peaking (SRP 15.4.9) and operation at 105% power.
- (b) The holdup times presented in NEDO-31400 are examples to illustrate the uses of Figures 3 and 4 of NEDO-31400. Per NEDO-31400, the summed dose for a system which provides in excess of about 8 hours of decay for krypton would be within the 6 rem dose limit.

Based on the information provided above, and in the Reference (a) submittal, the NEDO-31400 provides an acceptable bases and justification for the removal of the Main Steam Line High Radiation scram and isolation functions.

Please refer any questions on this matter to Frank Spangenberg 815-942-2920
Extension 3800

Sincerely,


J. Stephen Perry
Site Vice President
Dresden Station

cc: A. Bill Beach, Regional Administrator, Region III
J. F. Stang, Project Manager, NRR (Unit 2/3)
K. Riemer, Senior Resident Inspector, Dresden
Office of Nuclear Facility Safety - IDNS
File: Numerical