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Dresden Generating Station
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ComEd

June 22, 1998

JMHLTR: #98-0179

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

Subject: Dresden Nuclear Power Station Unit 2 and Unit 3
Core Operating Limits Reports
NRC Docket Nos. 50-237 and 50-249

- References:
- (a) B. Siegel (USNRC) to T. Kovach (ComEd) letter dated February 8, 1990. Approving the Technical Specification Amendment and Core Operating Limits Report per Generic Letter 88-16.
 - (b) J.M. Heffley (ComEd) to USNRC letter dated May 22, 1998. "Unit 2 Cycle 16 Reload and Core Operating Limits Report."
 - (c) NRC Generic Letter 88-16, "Removal of Cycle-Specific Parameter Limits from Technical Specifications."

Reference (b) transmitted the Unit 2 Cycle 16 Core Operating Limits Report (COLR) in accordance Reference (a) and NRC Generic Letter 88-16. During the internal review and approval process for Reference (b), ComEd discovered that the Beginning-of-Cycle (BOC) COLR for Unit 3 Cycle 15, which began on June 16, 1997 may not have been submitted. Subsequent investigation confirmed that required internal review and approval of the BOC COLR was completed, however, the BOC COLR was not submitted to the Staff. Preliminary investigation also determined that 2 mid-cycle updates (June 1997 and September 1997) to the Unit 2 Cycle 15 COLR and one mid-cycle update to the Unit 3 Cycle 15 COLR (September 1997) were reviewed and approved at the site, but were not submitted to the staff for review. These missed submittals constitute noncompliance with Technical Specification 6.9.A.6.c, which requires submittal of the COLR to the staff upon issuance. All of these documents were reviewed in accordance with the provisions of 10CFR50.59 and none were found to result in an unreviewed safety question. ComEd is addressing this problem and will develop the appropriate corrective actions in accordance with our internal corrective action process.

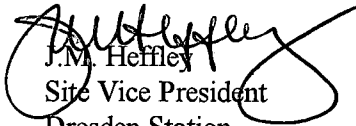
ComEd is therefore providing the following, 1) Attachment A, the current Unit 3 Cycle 15 COLR, dated September 19, 1997 (supersedes the Attachment B COLR); 2) Attachment B, the BOC Unit 3 Cycle 15 COLR dated June 13, 1997; 3) Attachment C, the first Mid-cycle Unit 2 Cycle 15 COLR dated June 24, 1997; and 4) Attachment D, the second Unit 2 mid-cycle Cycle 15 COLR, dated September 19, 1997. ComEd considers these missed submittals as isolated occurrences since the previous cycle COLRs for both Unit 2 and Unit 3 were submitted on March 5, 1996 and August 9, 1994, respectively. ComEd apologizes for any inconveniences this problem may have

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caused the Staff. Please address any questions concerning this letter to Frank Spangenberg, Regulatory Assurance Manager, extension 3800.

Sincerely,


J.M. Heffley
Site Vice President
Dresden Station

- Attachments:
- A. (Mid-Cycle) Core Operating Limits Report (COLR) Dresden Station Unit 3, Cycle 15, dated September 19, 1997
 - B. (Beginning-of-Cycle) Core Operating Limits Report (COLR) Dresden Station Unit 3, Cycle 15, dated June 13, 1997
 - C. (First Mid-cycle) Core Operating Limits Report (COLR) Dresden Station Unit 2, Cycle 15, dated June 24, 1997.
 - D. (Second Mid-cycle) Core Operating Limits Report (COLR) Dresden Station Unit 2, Cycle 15, dated September 19, 1997
- cc. Dr. C. Paperiello, Acting Regional Administrator, Region III
L.W. Rossbach, Dresden Project Manager, NRR
K. Reimer, Senior Resident Inspector, Dresden
Office of Nuclear Facility Safety-IDNS