



July 30, 1998

United States Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555-0001

Subject: Revision to ComEd Response to Generic Letter 94-02, "Long-Term Solutions and Upgrade of Interim Operating Recommendations for Thermal-Hydraulic Instabilities in Boiling Water Reactors"

Quad Cities Nuclear Power Station, Units 1 and 2
Facility Operating Licenses DPR-29 and DPR-30
NRC Docket Numbers 50-254 and 50-265

Dresden Nuclear Power Station, Units 2 and 3
Facility Operating Licenses DPR-19 and DPR-25
NRC Docket Numbers 50-237 and 50-249

- 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) J. Hosmer letter to U.S. NRC, dated September 15, 1997, transmitting "Revision to ComEd response to Generic Letter 94-02 (BWR Stability)"

By letter dated September 9, 1994, (Reference 2) Commonwealth Edison (ComEd) committed to address the Boiling Water Reactor (BWR) core stability issue (Reference 1) and established a schedule for completion. ComEd's existing commitment is to install the current Oscillating Power Range Monitor (OPRM) design at both stations in accordance with the schedules stated in Reference 3. ComEd has been working towards implementing this commitment and installation has been proceeding in accordance with the committed schedule. While preparing for the installation of the current OPRM design in the upcoming Dresden Nuclear Power Station, Unit 3 and Quad Cities Nuclear Power Station, Unit 1 refuel outages, ComEd has identified some concerns. The purpose of this letter is to describe those concerns and to inform the NRC of our revised implementation schedule as a result of addressing these concerns.

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Concerns identified during final design engineering stem from the vintage of the design incorporated in the Dresden Nuclear Power Station and the Quad Cities Nuclear Power Station Neutron Monitoring system. These concerns involve compatibility of the purchased OPRM equipment with the installed plant equipment and the inability to verify the final engineering design prior to installation of the equipment.

We are in the process of evaluating our current commitment to install the current OPRM design for Dresden Nuclear Power Station and Quad Cities Nuclear Power Station to determine if there are alternatives to address our concerns.

In order to fully evaluate these concerns and investigate alternatives, ComEd is delaying the OPRM installations at Quad Cities Nuclear Power Station, Unit 1 and Dresden Nuclear Power Station, Unit 3 by one cycle. The new schedule for installation for Dresden Nuclear Power Station and Quad Cities Nuclear Power Station is as follows.

Quad Cities Nuclear Power Station, Unit 1 installation	Q1R16 - (currently scheduled to start in 1Q01)
Dresden Nuclear Power Station, Unit 3 installation	D3R16 - (currently scheduled to start in 4Q00)
Quad Cities Nuclear Power Station, Unit 2 installation	Q2R15 - (schedule unchanged, currently scheduled to start in 1Q00)
Dresden Nuclear Power Station, Unit 2 installation	D2R16 - (schedule unchanged, currently scheduled to start in 4Q99)

This change to the installation schedule for Dresden Nuclear Power Station and Quad Cities Nuclear Power Station does not affect the level of safety. The most recent BWR Owners' Group interim actions have been implemented at Dresden Nuclear Power Station and Quad Cities Nuclear Power Station. These actions, including detailed procedural guidance and training, have proven successful at avoiding onset of instability in recent years. Further, a "regional" or "side-by-side" oscillation is unlikely at Dresden Nuclear Power Station and Quad Cities Nuclear Power Station because of the relatively low power density and tight inlet fuel orificing. Also, the Average Power Range Monitor (APRM) flow biased scram provides automatic protection for the core-wide mode of oscillation.

U.S. NRC

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

Respectfully,

A handwritten signature in black ink, appearing to read "R. M. Krich". The signature is written in a cursive style with a large, stylized initial "R".

R. M. Krich
Vice President - Regulatory Services

cc: Regional Administrator – NRC RIII
NRC Senior Resident Inspector - Quad Cities Nuclear Power Station
NRC Senior Resident Inspector - Dresden Nuclear Power Station