

October 13, 1998



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

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

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

LaSalle County Station, Units 1 and 2
Facility Operating License Nos. NPF-11 and NPF-18
NRC Docket Nos. 50-373 and 50-374

Subject: Revision to Technical Specifications Amendment Request to Support
Transition to Siemens Power Corporation ATRIUM-9B Fuel

- References:
1. R. M. Krich letter to U.S. NRC, "Technical Specification Amendment Request to Support Transition to Siemens Power Corporation ATRIUM-9B Fuel," dated August 14, 1998.
 2. T. H. Essig (USNRC) letter to H. Curet (SPC), "Acceptance for Referencing of Licensing Topical Report ANF-1125(P), Supplement 1, Appendix D, ANFB Critical Power Correlation Uncertainty For Limited Data Sets," dated July 13, 1998.
 3. H. Curet (SPC) letter to USNRC, "Request for Review of ANFB Critical Power Correlation Uncertainty for Limited Data Sets, ANF-1125(P), Supplement 1, Appendix D," dated April 18, 1997.
 4. T. H. Essig (USNRC) letter to H. Curet (SPC), "Acceptance for Referencing of Licensing Topical Report ANF-1125(P), Supplement 1, Appendix E," dated September 23, 1998.
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The purpose of this transmittal is to revise the proposed Technical Specifications amendment provided in Reference 1 in which Commonwealth Edison (ComEd) Company requested changes to the Quad Cities Nuclear Power Station, Units 1 and 2, Dresden Nuclear Power Station, Units 2 and 3, and LaSalle County Station, Units 1 and 2, Technical Specifications to reflect the transition to Siemens Power Corporation (SPC) ATRIUM-9B fuel.

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The NRC has recently approved a generic methodology for determining the additive constant uncertainty (ACU) for ATRIUM-9B fuel (Reference 4). Because the ACU proposed in Reference 1 was only an interim value resulting from the NRC's review of Reference 3, ComEd has elected to revise our amendment request to delete Reference 3 and incorporate this new methodology. The revision is provided in the Attachments 1 through 4.


ComEd has determined that this supplement has no impact on the Minimum Critical Power Ratio (MCPR) Safety Limits provided in Reference 1. Attachment A of the Reference 1 submittal provided a description and evaluation of the proposed Technical Specifications changes. This attachment is not replicated in this submittal; however, Attachment 1 to this letter provides a summary of the effects of this revision on the proposed Technical Specifications changes. This revision has a minor impact on the Evaluation of Significant Hazards Consideration provided in Reference 1. The impact is administrative in nature and does not alter the conclusions of the evaluation provided in Reference 1. ComEd reconfirms that the Reference 1 amendment request as revised by this submittal does not involve a significant hazards consideration. A revised Evaluation of Significant Hazards Consideration is provided in Attachment 3 to reflect the adoption of the approved Reference 4 methodology.

This revision has been reviewed and approved by ComEd On-Site and Off-Site Review in accordance with ComEd procedures.

ComEd is notifying the State of Illinois of this revision to a Technical Specifications change request by transmitting a copy of this letter and its attachments to the designated state official.

If you have any questions concerning this letter, please contact Mr. B. Rybak at (630) 663-7286.

Respectfully,



R. M. Krich

Vice President-Regulatory Services

- Attachment 1 - Revision to Technical Specifications Amendment Request to Support Transition to Siemens Power Corporation ATRIUM-9B Fuel
- Attachment 2 - Revised Inserts
- Attachment 3 - Revised Evaluation of Significant Hazards Consideration
- Attachment 4 - Revised Reference List

cc: Regional Administrator - Region III
NRC Senior Resident Inspector - Quad Cities Nuclear Power Station
NRC Senior Resident Inspector - Dresden Nuclear Power Station
NRC Senior Resident Inspector - LaSalle County Station

STATE OF ILLINOIS

DUPAGE COUNTY

IN THE MATTER OF

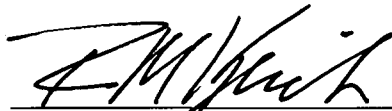
COMMONWEALTH EDISON COMPANY

QUAD CITIES STATION - UNITS 1 & 2

Docket Nos. 50-254
50-265

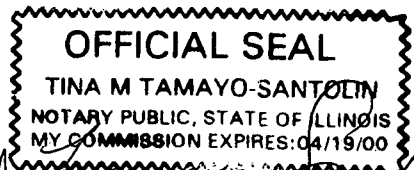
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I affirm that the content of this transmittal is true and correct to the best of my knowledge, information and belief.



R. M. Krich
Vice President - Regulatory Service

Subscribed and sworn to before me, a Notary Public in and for the State and County above named, this 13 day of October, 19 98



Tina M. Tamayo-Santolin
Notary Public

ATTACHMENT 1

Revision to Technical Specifications Amendment Request to Support Transition to Siemens Power Corporation ATRIUM-9B Fuel

Background

ComEd is currently using Siemens Power Corporation (SPC) ATRIUM-9B fuel. The Reference 1 Application for Amendment of the Quad Cities, Dresden, and LaSalle Technical Specifications was submitted to the NRC to support operation with ATRIUM-9B fuel for future cycles. The key items proposed in Reference 1 were:

- a) incorporation of Siemens' new methodologies that would enhance operational flexibility and reduce the likelihood of future plant derates,
- b) administrative changes that both eliminate the cycle specific implementation of ATRIUM-9B fuel and adopt Improved Technical Specification language, where appropriate, and
- c) changes to the Quad Cities, Dresden, and LaSalle Minimum Critical Power Ratio (MCPR) Safety Limits.

Reference 1 requested that ANF-1125, Supplement 1 Appendix D be added to the Technical Specifications of all three sites to eliminate cycle specific implementation of interim ANFB additive constant uncertainties and associated cycle specific MCPR Safety Limits for reloads of ATRIUM-9B fuel. Appendix D was prepared by SPC to address issues stemming from an NRC vendor performance inspection review. It documented uncertainties resulting from an increased critical power data base that used dry out data from other fuel designs sharing many of the same design features as the ATRIUM-9B design. The NRC approved Appendix D for ATRIUM-9X fuel. In Reference 2, the NRC documented that a 0.029 additive constant uncertainty should be applied for ATRIUM-9B fuel until a new additive constant uncertainty value has been approved by the NRC. In the Technical Specifications amendment request, Reference 2 was used to document the NRC approval of the 0.029 additive constant uncertainty.

SPC has since submitted ANF-1125, Supplement 1 Appendix E, which documents a new statistical calculation for the ATRIUM-9B additive constant uncertainty based on a database comprised solely of ATRIUM-9B test results. This document was approved by the NRC on September 23, 1998 (Reference 4). This topical report calculates an ATRIUM-9B additive constant uncertainty for ATRIUM-9B fuel of 0.027 for rods with a local peaking factor less than 1.22 and 0.029 for rods with a local peaking factor greater than 1.22.

Since the NRC has approved ANF-1125, Supplement 1, Appendix E, ComEd is proposing to revise the Reference 1 Technical Specification amendment request. The revision to the Reference 1 Technical Specification amendment request replaces the reference to Appendix D and the cover letter to the SER for Appendix D (which provided

an interim additive constant uncertainty for ATRIUM-9B) with the Appendix E methodology.

Effects on the Reference 1 Submittal

The Reference 1 submittal proposed to reference Appendix D in Section 6.9.A.6.b of the Dresden and Quad Cities Technical Specifications and Section 6.6.A.6.b and Bases Section 2.1.2 of the LaSalle Units 1 and 2 Technical Specifications. As discussed with the NRC during a September 21, 1998, teleconference, because Appendix E is directly applicable to ATRIUM-9B fuel, it is appropriate to reference the approved Appendix E topical report in lieu of Appendix D. ComEd has revised the affected marked-up Technical Specification pages previously provided with Reference 1, which are provided in Attachment 2 to this supplement.

The Minimum Critical Power Ratio (MCPR) Safety Limits that were proposed in the Reference 1 submittal remain applicable under the Appendix E methodology. The interim additive constant uncertainty supported by the NRC (cover letter to the SER for Appendix D) was 0.029. The additive constant uncertainty documented in Appendix E is 0.027 for rods less than 1.22 local peaking factor and 0.029 for rods with a local peaking factor greater than 1.22. The 0.029 additive constant uncertainty (from Appendix D) that was used to determine the MCPR Safety limits proposed in the Reference 1 submittal is more limiting (and thus conservative) relative to the additive constant uncertainties documented in Appendix E. Therefore, there is no change to the MCPR Safety Limits in the Reference 1 submittal due to changing the basis for the additive constant uncertainty from Appendix D to Appendix E.

Additionally, ComEd has reviewed the Evaluation of Significant Hazards Consideration provided in Reference 1. This proposed supplement does have a minor impact on the Evaluation of Significant Hazards Consideration provided in Reference 1. The impact is administrative in nature and does not alter the conclusions of the evaluation. ComEd has reconfirmed that the license amendment request and the proposed supplement contained herein do not involve a significant hazards consideration because the changes do not involve a significant increase in the probability or consequences of any accident previously evaluated; or create the possibility of a new or different kind of accident from any accident previously evaluated; or involve a significant reduction in a margin of safety. The Evaluation of Significant Hazards Consideration provided with the Reference 1 submittal has been revised to include ANF-1125 Supplement 1 Appendix E and is included as Attachment 3 to this submittal. Additionally, the revised reference list from the Reference 1 submittal is also provided (Attachment 4).

Attachment 2

Revised Inserts