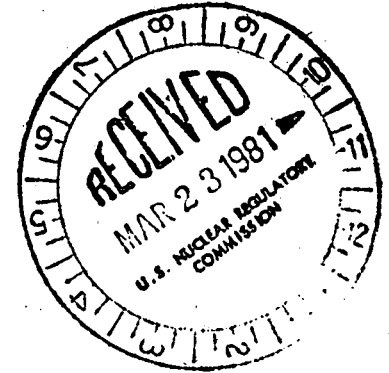




Commonwealth Edison
One First National Plaza, Chicago, Illinois
Address Reply to: Post Office Box 767
Chicago, Illinois 60690

March 19, 1981



Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Subject: Dresden Station Units 2 and 3
Quad Cities Station Units 1 and 2
BWR Fuel Burnup in Excess of 40,000 MWD/ST
Peak Pellet Exposure
NRC Docket Nos: 50-237/249/254/265

- References (a): T. A. Ippolito letter to J. S. Abel dated November 12, 1980 with Staff SER approving extended exposure MAPLHGR limits for 8x8 fuel, Dresden 2 and Quad Cities 1/2
- (b): R. L. Tedesco letter to R. E. Engle (GE) dated November, 1980 approving changes to NEDE-24011
- (c): R. F. Janecek letter to H. R. Denton dated December 20, 1979 concerning extended exposure MAPLHGR limits, Dresden 2 and Quad Cities 1
- (d): R. F. Janecek letter to the Director of Nuclear Reactor Regulation dated November 13, 1980 concerning the irradiation of a Special Test Assembly for extended burnup, Quad Cities 1

Dear Mr. Denton:

Commonwealth Edison requests clarification of constraints placed on our BWR fuel exposures in the Reference (a) SER. That letter requires CECO. to continue limiting peak pellet exposure to less than 40,000 MWD/ST.

This requirement appears to be in conflict with the generic NRC approval of such operation which was received several days earlier by General Electric in Reference (b).

Commonwealth Edison has assumed that our previous commitment to comply with the 40,000 MWD/ST constraint, which was documented in Reference (c), is no longer applicable in view of the Reference (b) generic approval.

*A001
5/10*

8103240198

P

Please clarify this discrepancy between the generic response to General Electric and the Edison plant-specific SER. If the requirements of the SER are confirmed, please provide the bases for constraining Edison plants.

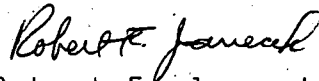
Such a position could significantly impact Edison operation especially at Quad Cities Station, where a special test assembly has been loaded and is under irradiation in Unit 1 as part of an Extended Burnup Program. Reference (d) included proposed MAPLHGR limits for planar exposures in excess of 40,000 MWD/ST for this fuel type. As stated therein, the equivalent core average burnup when these limits will be needed is 4000 MWD/ST into the cycle. Peak pellet exposure however, leads planar exposure upon which MAPLHGR limits are based. On a peak pellet basis 40,000 MWD/ST may be reached in the QCl extended burnup assembly as early as May, 1981.

Although there is no apparent basis for continued compliance with the 40,000 MWD/ST peak pellet constraint, should the staff maintain the Reference (a) position Edison would be forced to alter the operating strategy for Quad Cities 1 Cycle 6 at significant cost. In order to make plans for such a contingency, CECO requests staff clarification as soon as possible.

Please address any questions concerning this matter to this office.

One (1) signed original and fifty-nine (59) copies of this transmittal are provided for your use.

Very truly yours,



Robert F. Janecek
Nuclear Licensing Administrator
Boiling Water Reactors

cc: RIII Inspector, Dresden
RIII Inspector, Quad Cities

1562B

80112 8012080089

1950

1950

1950

1950

1950

1950

1950