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May 22, 1981

Mr. Darrell G. Eisenhut, Director
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Subject: Dresden Station Unit 2
Quad Cities Station Unit 1
Reload Analyses Schedule for
ODYN Implementation
NRC Docket Nos. 50-237 and 50-254

- References (a): Letter, D. G. Eisenhut (NRC) to All Holders of Construction Permits and Operating Licenses for BWR, November 4, 1980.
- (b): Letter, R. H. Buchholz (GE) to Paul S. Check (NRC), "Response to NRC Request for Information on ODYN Computer Model", September 5, 1980.
- (c): Letter, E. D. Fuller to D. F. Ross, "Impact of ODYN Transient Model on Plant Operating Limits", June 26, 1978.

Dear Mr. Eisenhut:

In Reference (a), the NRC has indicated its position that, after January 1982, all operating BWRs with General Electric reload licensing analyses must have the limiting transients recalculated with the ODYN transient code, even if no reload has been received.

Reload applications for Dresden 2 Reload 5 and Quad Cities 1 Reload 5 have previously been submitted to, and approved by, the NRC using the REDY transient model. Both plants are currently scheduled to be operating through January 1982.

In order to satisfy the stipulations of Reference (a), we would be required to have General Electric reanalyze the limiting transients for the current operating cycles for these plants using ODYN, by January 1982. These reanalyses would be redundant since the plants have already been licensed under the REDY code.

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General Electric has presented evidence that demonstrates the existing licensing application of the REDY transient model is conservative and that its continued use during an orderly transition to ODYN is appropriate. As demonstrated in the ODYN/REDY comparison in References 2 and 3, overall plant operating limits determined using REDY are expected to be either unaffected or improved under ODYN analyses. These comparisons served as an acceptable basis for continued licensing approvals with the REDY model from 1977 through January 1982 during which time the ODYN model was under review. It should be noted that Dresden 2 and Quad Cities 1 both have Technical Specification operating limits on MCPR which are conservative with respect to current cycle transient analyses results as a consequence of the reload licensing application of 10CFR50.59. Furthermore, these units are projected to begin power coastdowns, which result in progressively increasing operating and safety margins, after only four months (QC1) and six months (D2) of full power operation in 1982. They will then shutdown for refueling after an additional four months (QC1) and six months (D2) of coastdown operation.

These factors lead Commonwealth Edison to conclude that continued operation using REDY poses no risk to public safety and there is no benefit to the public in performing a redundant ODYN analysis for the few remaining months of operation in the current cycles. The conservatism in the REDY licensing basis, when combined with additional margins associated with 10CFR50.59 reload licensing and coastdown operation, make this unnecessary. In contrast, the impact of these retrofit analyses on the reload schedules, as well as on other more important analyses activities would be severe.

Your concurrence is requested to delay use of ODYN for Dresden Unit 2 and Quad Cities Unit 1 until the refueling analyses for the first reloads following January 1982. If the NRC Staff does not concur with these agreements and imposes the January, 1982 reanalyses requirement, the work will need to be authorized and initiated in the next few weeks. A timely response is, therefore, essential.

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,



J. S. Abel
Director of Nuclear Licensing

cc: Region III Inspector, Dresden
Region III Inspector, Quad Cities