



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

April 18, 1986

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

Subject: Dresden Station Unit 3
Supplement to Proposed License
Amendment - Cycle 10 Reload
NRC Docket No. 50-249

Reference: Letter from J. R. Wojnarowski to H. R. Denton
dated February 21, 1986.

Dear Mr. Denton:

The referenced transmittal provided our proposed License and Technical Specification amendments in support of the Dresden Unit 3 Cycle 10 Reload. As a result of concerns identified by members of your staff, we are providing supplemental changes to our proposed amendments. The additional Technical Specification changes are provided in Attachment 1 and should be incorporated with our previous submittal.

The additional changes in Attachment 1 include the following:

- (1) Incorporation of Linear Heat Generation Rate (LHGR) limits for Exxon 8 x 8 and 9 x 9 fuel as a Limiting Condition for Operation (LCO). Operation with Exxon 8 x 8 fuel without specific LHGR limits in the Technical Specifications was previously approved for Dresden Units 2 and 3. However, your staff has indicated that incorporation of these limits in the Technical Specification is now required for both 8 x 8 and 9 x 9 fuel. These surveillances have previously been performed at Dresden under a generalized LCO (3.1.A.2.b) therefore incorporating the specific limits in the Technical Specifications represents an administrative change.

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The LHGR curves provided in Attachment 1, Figure 3.5-1A, are based on the limits described in Exxon's Generic Report XN-NF-81-21, Revision 2 (8 x 8) and XN-NF-85-67 (9 x 9). A better quality copy of Figure 3.5-1A will be provided at a later date.

- (2) Incorporation of reactor stability monitoring and restrictions on the allowable operating conditions during Single Loop Operation (SLO). Although core stability calculations for Dresden 3 Cycle 10 indicate substantial stability margins, these additional provisions have been required to provide added assurance of stable reactor operation while in Single Loop.

In addition to the above supplemental Technical Specifications, your staff has requested, and Commonwealth Edison commits to the following:

- Core plate differential pressure will be monitored during SLO per station procedures.
- During Unit 3 Startup Testing, baseline LPRM and APRM data will be accumulated in Single Loop and Two Loop Operation at similar power/flow points within Region II (see Figure 3.6.2 in Attachment 1). This test is scheduled to be performed approximately two weeks after achieving full power operation to allow calibration of core flow instrumentation and fuel preconditioning prior to the test. Results will be provided to the NRC when available but no later than the Cycle 10 startup test report which is to be submitted within 90 days of startup.

Commonwealth Edison has reviewed the impact of the additional Technical Specifications described above on our No Significant Hazards Consideration (NSHC) evaluation provided with the reference. Since the incorporation of LHGR limits (item 1 above) is an administrative change and the SLO provisions (item 2) represent additional and highly conservative restrictions with respect to our previous submittal, our conclusion that No Significant Hazards Consideration exists remains valid. Attachment 2 provides an updated NSHC analysis.

Commonwealth Edison is notifying the State of Illinois of this request and our No Significant Hazards Consideration determination by transmittal of a copy of this letter and its attachments to the designated State Official.

April 18, 1986

Please direct any further questions you may have regarding this matter to this office.

Three (3) signed originals and thirty-seven (37) copies of this transmittal and the attachment are provided for your use.

Very truly yours,



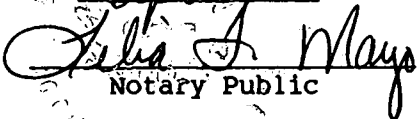
J. R. Wojnarowski
Nuclear Licensing Administrator

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- Attachments 1: Supplemental Technical Specification to DPR-25
2: Updated No Significant Hazards Consideration Analysis

cc: R. Gilbert - NRR
NRC Resident Inspector - Dresden
M. C. Parker - State of Ill.

SUBSCRIBED AND SWORN to
before me this 18th day
on April, 1986



Notary Public

ATTACHMENT 1

SUPPLEMENTAL TECHNICAL SPECIFICATIONS

TO DPR-25