1.1 SAFETY LIMIT (Cont'd.)

2.1 LIMITING SAFETY SYSTEM SETTING (Cont'd.)

W_D = percent of drive flow required to produce a rated core flow of 98 Mlb/hr.

In the event of operation of any fuel assembly with a maximum fraction of limiting power density (MFLPD) greater than the fraction of rated power (FRP), the setting shall be modified as follows:

Where: S is less than or equal to
$(.58W_D + 62)$ [FRP/MFLPD]
during Dual Loop Operation or
$(.58\ W_D + 58.5)$ [FRP/ MFLPD]
during Single Loop Operation

FRP = fraction of rated thermal power

MFLPD = Maximum Fraction of the Limiting Power Density for all fuel types

The ratio of FRP/MFLPD shall be set equal to 1.0 unless the actual operating value is less than 1.0, in which case the actual operating value will be used.

This adjustment may also be performed by increasing the APRM gain by the inverse ratio, MFLPD/FRP, which accomplishes the same degree of protection as reducing the trip setting by FRP/MFLPD.

2. APRM Flux Scram Trip Setting (Refuel or Startup and Hot Standby Mode)

8604280154 860418
PDR ADOCK 05000249
P PDR

1.1 SAFETY LIMIT (Cont'd.)

B. Core Thermal Power Limit (Reactor Pressure is less than or equal to 800 psig)

When the reactor pressure is less than or equal to 800 psig or core flow is less than 10% of rated, the core thermal power shall not exceed 25 percent of rated thermal power.

2.1 LIMITING SAFETY SYSTEM SETTING (Cont'd.)

When the reactor mode switch is in the refuel or the startup/hot standby position, the APRM scram shall be set at less than or equal to 15% of rated core thermal power.

3. IRM Flux Scram Trip Setting

The IRM flux scram setting shall be set at less than or equal to 120/125 of full scale

B. APRM Rod Block Setting

The APRM rod block setting shall be:

S is less than or equal to [$.58W_D$ + 50] during Dual Loop Operation or S is less than or equal to [$.58W_D$ + 46.5] during Single Loop Operation.

The definitions used above for the APRM scram trip apply.

In the event of operation of any fuel assembly with a maximum fraction limiting power density (MFLPD) greater than the fraction of rated power (FRP), the setting shall be modified as follows:

S is less than or equal to ($.58W_D$ + 50) [FRP/MFLPD] during Dual Loop Operation or S is less than or equal to ($.58W_D$ + 46.5) [FRP/MFLPD] during Single Loop Operation

The definitions used above for the APRM scram trip apply.

The ratio of FRP to MFLPD shall be set equal to 1.0 unless the actual operating value is less than 1.0. In which case the actual operating value will be used.

2.1 LIMITING SAFETY SYSTEM SETTING BASES (Cont'd.)

At times it may be necessary to operate with one reactor coolant recirculation pump out of service. During Single Loop Operation, the normal drive flow relationship during Dual Loop Operation is altered. This is the result of reverse flow through the idle loop jet pumps when the active loop recirculation pump speed is above 20 to 40% of rated. Some of the active loop flow is then diverted from the core and backflows through the idle loop jet pumps; hence, the core receives less flow than would be predicted based upon the Dual Loop drive flow to core flow relationship. If the APRM flow biased trip settings were not altered for Single Loop Operation, the new drive flow to core flow relationship would nonconservatively result in flow biased trips occurring at neutron fluxes higher than normal for a given core flow.

The scram trip setting must be adjusted to ensure that the LHGR transient peak is not increased for any combination of Maximum Fraction of Limiting Power Density (MFLPD) and reactor core thermal power. The scram setting is adjusted in accordance with the formula in specification 2.1.A.1 when the MFLPD is greater than the fraction of rated power (FRP).

The adjustment may also be accomplished by increasing the APRM gain by the reciprocal of FRP/MFLPD. This provides the same degree of protection as reducing the trip setting by FRP/MFLPD by raising the initial APRM reading closer to the trip setting such that a scram would be received at the same point in a transient as if the trip setting had been reduced.

2. APRM Flux Scram Trip Setting
(Refuel or Start & Hot Standby Mode)

For operation in the startup mode while the reactor is at low pressure, the APRM scram setting of 15 percent of rated power provides adequate thermal margin between the setpoint and the safety limit, 25 percent of rated. The margin is adequate to accommodate anticipated maneuvers associated with power plant startup. Effects of increasing pressure at zero or low void content are minor, cold water from sources available during startup is not much colder than that already in the system, temperature coefficients are small, and control rod patterns are constrained to be uniform by operating procedures backed up by the rod worth minimizer. Of all possible sources of reactivity input, uniform control rod withdrawal is the most probable cause of significant power rise. Because

3.1 LIMITING CONDITIONS FOR OPERATION

REACTOR PROTECTION SYSTEM

Applicability:

Applies to the instrumentation and associated devices which initiates a reactor scram.

Objective:

To assure the operability of the reactor protection system.

Specification:

A. Reactor Protection System

1. The setpoints, minimum number of trip systems, and minimum number of instrument channels that must be operable for each position of the reactor mode switch shall be as given in Table 3.1.1. The system response times from the opening of the sensor contact up to and including the opening of the trip actuator contacts shall not exceed 50 milliseconds.

2. If during operation, the maximum fraction of limiting power density exceeds the fraction of rated power when operating above 25% rated thermal power, either:

4.1 SURVEILLANCE REQUIREMENTS

REACTOR PROTECTION SYSTEM

Applicability:

Applies to the surveillance of the instrumentation and associated devices which initiate reactor scram.

Objective:

To specify the type and frequency of surveillance to be applied to the protection instrumentation.

Specification:

A. Reactor Protection System

1. Instrumentation systems shall be functionally tested and calibrated as indicated in Tables 4.1.1 and 4.1.2, respectively.

2. Daily during reactor power operation above 25% rated thermal power, the core power distribution shall be checked for:

3.1 LIMITING CONDITIONS FOR OPERATION (Cont'd.)

a. The APRM scram and rod block settings shall be reduced to the values given by the equations in Specifications 2.1.A.1 and 2.1.B. This may be accomplished by increasing APRM gains as described therein.

b. The power distribution shall be changed such that the maximum fraction of limiting power density no longer exceeds the fraction of rated power.

3. Two RPS electric power monitoring channels for each inservice RPS MG set or alternate source shall be OPERABLE at all times.

4.1 SURVEILLANCE REQUIREMENTS (Cont'd.)

a. Maximum fraction of limiting power density (MFLPD) and compared with the fraction of rated power (FRP).

b. Deleted.

3. The RPS power monitoring system instrumentation shall be determined OPERABLE:

a. At least once per 6 months by performing a CHANNEL FUNCTIONAL TEST, and

4.1 SURVEILLANCE REQUIREMENT BASES (Cont'd.)

Group (C) devices are active only during a given portion of the operational cycle. For example, the IRM is active during startup and inactive during full-power operation. Thus, the only test that is meaningful is the one performed just prior to shutdown or startup; i.e., the tests that are performed just prior to use of the instrument.

Calibration frequency of the instrument channel is divided into two groups. These are as follows:

1. Passive type indicating devices that can be compared with like units on a continuous basis.

2. Vacuum tube or semiconductor devices and detectors that drift or lose sensitivity.

Experience with passive type instruments in Commonwealth Edison generating stations and substations indicates that the specified calibrations are adequate. For those devices which employ amplifiers, etc., drift specifications call for drift to be less than 0.19/month; i.e., in the period of a month, a drift of .19 would occur and thus provide for adequate margin.

For the APRM system drift of electronic apparatus is not the only consideration in determining a calibration frequency. Change in power distribution and loss of chamber sensitivity dictate a calibration every seven days. Calibration on this frequency assures plant operation at or below thermal limits.

A comparison of Tables 4.1.1 and 4.1.2 indicates that six instrument channels have not been included in the latter Table. These are: Mode Switch in Shutdown, Manual Scram, High Water Level in Scram Discharge Volume Float Switches, Main Steam Line Isolation Valve Closure, Generator Load Rejection, and Turbine Stop Valve Closure. All of the devices or sensors associated with these scram functions are simple on-off switches and, hence, calibration is not applicable; i.e., the switch is either on or off. Further, these switches are mounted solidly to the device and have a very low probability of moving; e.g., the switches in the scram discharge volume tank. Based on the above, no calibration is required for these six instrument channels.

B. The MFLPD shall be checked once per day to determine if the APRM gains or scram requires adjustment. This may normally be done by checking the LPRM readings, TIP traces, or process computer calculations.

4.1 SURVEILLANCE REQUIREMENT BASES (Cont'd.)

Only a small number of control rods are moved daily and thus the peaking factors are not expected to change significantly and thus a daily check of the MFLPD is adequate.

TABLE 3.2.3 (Notes)

1. For the Startup/Hot Standby and Run positions of the Reactor Mode Selector Switch, there shall be two operable or tripped trip systems for each function, except the SRM rod blocks, IRM upscale, IRM downscale and IRM detector not fully inserted in the core need not be operable in the "Run" position and APRM downscale, APRM upscale (flow bias), and RBM downscale need not be operable in the Startup/Hot Standby mode. A RBM upscale need not be operable at less than 30% rated thermal power. One channel may be bypassed above 30% rated thermal power provided that a limiting control rod pattern does not exist. For systems with more than one channel per trip system, if the first column cannot be met for both trip systems, the systems shall be tripped. For the scram discharge volume water level high rod block, there is one instrument channel per bank.

2. W_D percent of drive flow required to produce a rated core flow of 98 Mlb/hr. MFLPD = highest value of FLPD.

3. IRM downscale may be bypassed when it is on its lowest range.

4. This function may be bypassed when the count rate is greater than or equal to 100 cps.

5. One of the four SRM inputs may be bypassed.

6. This SRM function may be bypassed in the higher IRM ranges when the IRM upscale Rod Block is operable.

7. Not required while performing low power physics test at atmospheric pressure during or after refueling at power levels not to exceed 5 MW(t).

3.5 LIMITING CONDITION FOR OPERATION (Cont'd.)

I. Average Planar LHGR

During steady state power operation, the Average Planar Linear Heat Generation Rate (APLHGR) of all the rods in any fuel assembly, as a function of average planar exposure for G.E. fuel and average bundle exposure for Exxon fuel at any axial location, shall not exceed the maximum average planar LHGR shown in Figure 3.5-1 (consisting of five curves). For operation during Single Loop Operation, the values of Figure 3.5-1 shall be decreased by a multiplicative factor of 0.7. If at any time during operation it is determined by normal surveillance that the limiting value for APLHGR is being exceeded, action shall be initiated within 15 minutes to restore operation to within the prescribed limits. If the APLHGR is not returned to within the prescribed limits within two (2) hours, the reactor shall be brought to the Cold Shutdown condition within 36 hours. Surveillance and corresponding action shall continue until reactor operation is within the prescribed limits.

J. LOCAL LHGR

During steady state power operation, the linear heat generation rate (LHGR) of any rod in any fuel assembly

4.5 SURVEILLANCE REQUIREMENT (Cont'd.)

I. Average Planar Linear Heat Generation Rate (APLHGR)

The APLHGR for each type of fuel as a function of average planar exposure for G.E. fuel and average bundle exposure for Exxon fuel shall be determined daily during reactor operation at greater than or equal to 25% rated thermal power.

J. Linear Heat Generation Rate (LHGR)

The LHGR shall be checked daily during reactor operation at greater than or equal to 25% rated thermal power.

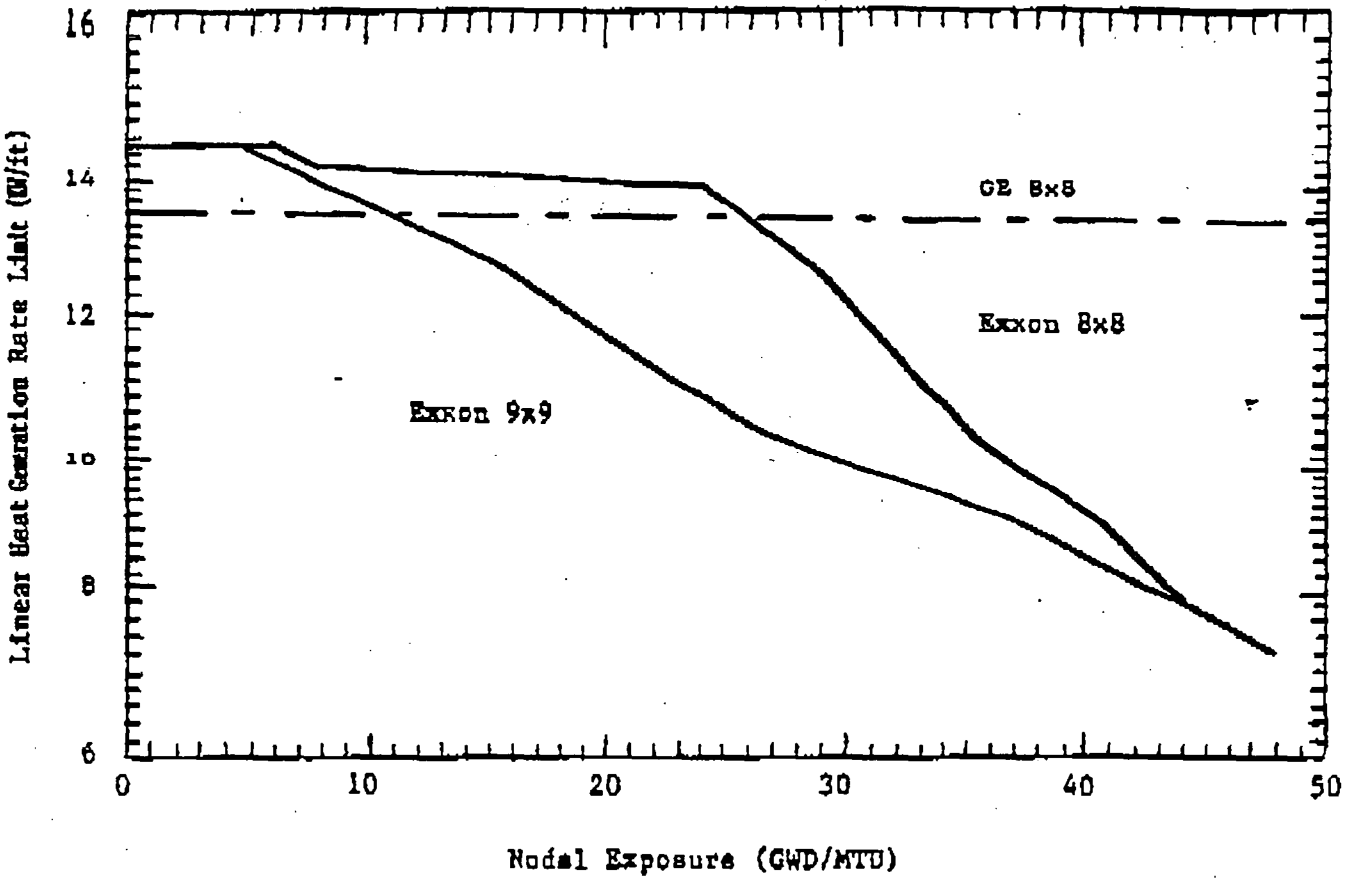
3.5 LIMITING CONDITION FOR OPERATION (Cont'd.)

at any axial location shall not exceed its maximum LHGR value shown in Figure 3.5-1A (consists of three curves).

Figure 3.5-1A depicts the LHGR values for Exxon 8x8 and 9x9 fuel as a function of nodal exposure and for GE 8x8 fuel as a constant design value of 13.4 Kw/ft.

If at any time during operation, it is determined by normal surveillance that the limiting value for LHGR for any fuel assembly is being exceeded, action shall be initiated within 15 minutes to restore operation to within the prescribed limits. If the LHGR is not returned to within the prescribed limits within two (2) hours, the reactor shall be brought to the Cold Shutdown condition within 36 hours. Surveillance and corresponding action shall continue until reactor operation is within the prescribed limits.

4.5 SURVEILLANCE REQUIREMENT (Cont'd.)



Exxon 8x8 Fuel

Exposure	LHGR	Exposure	LHGR
0.00	14.50	21.40	13.93
2.54	14.50	24.15	13.93
5.16	14.50	26.92	13.08
6.24	14.50	29.72	12.24
7.83	14.19	32.54	11.40
10.55	14.13	35.37	10.47
13.24	14.06	38.23	9.55
15.96	14.06	41.11	8.65
18.67	14.00	44.21	7.77

Exxon 9x9 Fuel

Exposure	LHGR
0.00	14.50
5.00	14.50
25.20	10.80
48.00	7.20

Figure 3.5-1A

LINEAR HEAT GENERATION RATE VS.
NODAL EXPOSURE

3.5 LIMITING CONDITION FOR OPERATION BASES (Cont'd.)

local variations in power distribution within a fuel assembly affect the calculated peak clad temperature by less than plus or minus 20°F relative to the peak temperature for a typical fuel design, the limit on the average planar LHGR is sufficient to assure that calculated temperatures are below the 10CFR50, Appendix K limit.

The maximum average planar LHGRs shown in Figure 3.5.1 are based on calculations employing the models described in Reference (1) and in reference (2). Power operation with APLHGRs at or below those shown in Fig. 3.5.1 assures that the peak cladding temperature following a postulated loss-of-coolant accident will not exceed the 2200°F limit.

The maximum average planar LHGRs for G.E. fuel plotted in Fig. 3.5.1 at higher exposures result in a calculated peak clad temperature of less than 2200°F. However, the maximum average planar LHGRs are shown on Fig. 3.5.1 as limits because conformance calculations have not been performed to justify operation at LHGHs in excess of those shown.

J. Local LHGR

This specification assures that the maximum linear heat generation rate in any fuel rod is less than the design linear heat generation rate even if fuel pellet densification is postulated.

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(1) "Loss of Coolant Accident Analyses Report for Dresden Units 2, 3 and Quad-Cities Units 1, 2 Nuclear Power Stations," NEDO-24146A, Revision 1, April, 1979.

(2) XN-NF-81-75 "Dresden Unit 3 LOCA Model Using the ENC EXEM Evaluation Model MAPLHGR Results"

3.6 LIMITING CONDITION FOR OPERATION (Cont'd.)

3. During Single Loop Operation, the following restrictions are required:

   a. Operation with the Master Flow Control in AUTO is not permitted;

   b. Operation in Region I of Figure 3.6-2 is not permitted. Initiate action immediately after entering Region I and be outside of Region I within 2 hours.

4.6 SURVEILLANCE REQUIREMENT (Cont'd.)

3.a. Baseline APRM and LPRM* noise levels for SLO shall be acquired prior to entering Region II of Figure 3.6-2 for the first time following each refueling outage.

b. When operating in Region II of Figure 3.6-2 perform APRM and LPRM* surveillances to verify that their noise levels are within three (3) times their established baseline values at the following intervals:

   i. Within 30 minutes of entering Region II;

   ii. At least once per 8 hour shift; and

   iii. Within 30 minutes after the completion of a core thermal power increase of 5% or greater.

   * Detector levels A and C of one LPRM string per core octant plus detector levels A and C of one LPRM string in the center of the core shall be monitored.

3.6 LIMITING CONDITION FOR OPERATION (Cont'd.)

c. Operation in Region II of Figure 3.6-2 is permitted provided that:

i. Baseline data has been acquired per specification 4.6.H.3.a;

ii. If baseline data has not been acquired per specifcation 4.6.H.3.a., immediately initiate action to be outside Region II within 2 hours;

iii. Stable reactor operation is verified per specification 4.6.H.3.b.; and

iv. If stable reactor operation cannot be verified per specification 4.6.H.3.b., immediately initiate action to restore stable operation within 2 hours.

d. The operable recirculation pump shall be at a speed less than 65% of rated before starting the inoperable pump;

4.6 SURVEILLANCE REQUIREMENT (Cont'd.)

3.6 LIMITING CONDITION FOR OPERATION (Cont'd.)

e. The suction valve in the idle loop shall be closed and electrically isolated except when the idle loop is being prepared for return to service; and

f. If the tripped pump is out of service for more than 24 hours, implement the following additional restrictions:

i. The flow biased RBM Rod Block LSSS shall be reduced by 4.0% (Specification 3.2.C.1);

ii. The flow biased APRM Rod Block LSSS shall be reduced by 3.5% (Specification 2.1.B);

iii. The flow biased APRM scram LSSS shall be reduced by 3.5% (Specification 2.1.A.1);

iv. The MCPR Safety Limit shall be increased by 0.03 (Specification 1.1.A);

v. The MCPR Operating Limit shall be increased by 0.03 (Specification 3.5.K.3);

4.6 SURVEILLANCE REQUIREMENT (Cont'd.)

3.6 LIMITING CONDITION FOR OPERATION (Cont'd.)

vi. The MAPLHGR Operating Limit shall be reduced by a multiplicative factor of 0.7 (Specification 3.5.I).

4. Core thermal power shall not exceed 25% of rated without forced recirculation. If core thermal power is greater than 25% of rated without forced recirculation, action shall be initiated within 15 minutes to restore operation to within the prescribed limits and core thermal power shall be returned to within the prescribed limit within two (2) hours.

I. Snubbers (Shock Suppressors)

4.6 SURVEILLANCE REQUIREMENT (Cont'd.)

I. Snubbers (Shock) Suppressors)

The following surveillance requirements apply to safety related snubbers.

3.6 LIMITING CONDITION FOR OPERATION BASES (Cont'd.)

In addition, during the start-up of Dresden Unit 2, it was found that a flow mismatch between the two sets of jet pumps caused by a difference in recirculation loops could set up a vibration until a mismatch in speed of 27% occurred. The 10% and 15% speed mismatch restrictions provide additional margin before a pump vibration problem will occur.

Reduced flow MCPR Operating Limits for Automatic Flow Control are not applicable for Single Loop Operation. Therefore, sustained reactor operation under such conditions is not permitted.

Regions I and II of Figure 3.6.2 represent the areas of the power/flow map with the least margin to stable operation. Although calculated decay ratios at the intersection of the natural circulation flow line and the APRM Rod Block line indicate that substantial margin exists to where unstable operation could be expected. Specifications 3.6.H.3.b., 3.6.H.3.c. and 4.6.H.3. provide additional assurance that if unstable operation should occur, it will be detected and corrected in a timely manner.

During the starting sequence of the inoperable recirculation pump, restricting the operable recirculation pump speed below 65% of rated prevents possible damage to the jet pump riser braces due to excessive vibration.

The closure of the suction valve in the idle loop prevents the loss of LPCI through the idle recirculation pump into the downcomer.

Analyses have been performed which support indefinite operation in single loop provided the restrictions discussed in Specification 3.6.H.3.d. are implemented within 24 hours.

The LSSSs are corrected to account for backflow through the idle jet pumps above 20-40% of rated recirculation pump speed. This assures that the original drive flow biased rod block and scram trip settings are preserved during Single Loop Operation.

The MCPR safety limit has been increased by 0.03 to account for core flow and TIP reading uncertainties which are used in the statistical analysis of the safety limit. In addition, the MCPR Operating Limit has also been increased by 0.03 to maintain the same margin to the safety limit as during Dual Loop Operation.

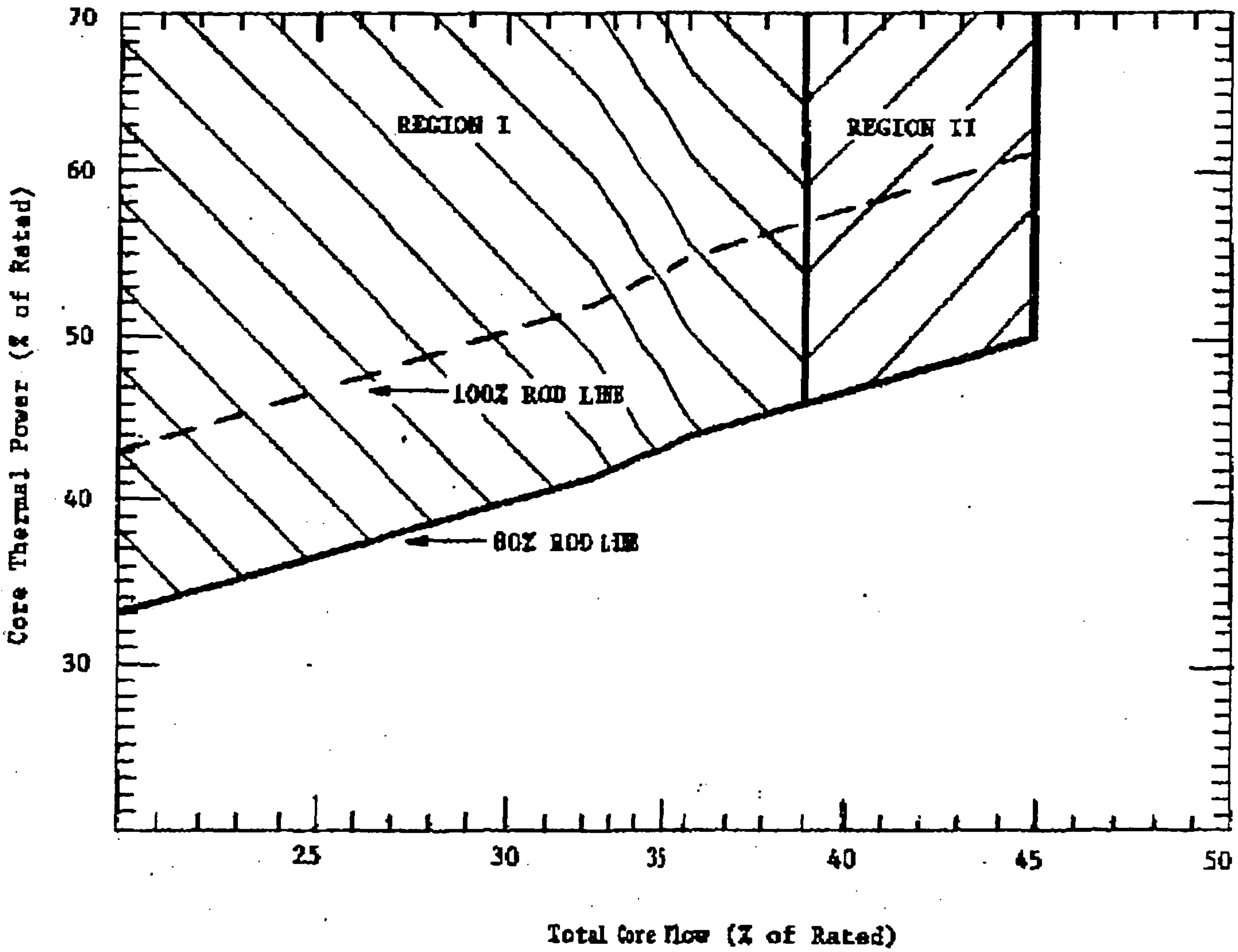

FIGURE 3.6.2

THERMAL POWER VS CORE FLOW LIMITS FOR THERMAL HYDRAULIC STABILITY SURVEILLANCE IN SINGLE LOOP OPERATION

3.6 LIMITING CONDITION FOR OPERATION BASES (Cont'd.)

The mulplicative 0.7 reduction of MAPLHGR Operating Limit accounts for the more rapid loss of core flow during Single Loop Operation than during Dual Loop Operation.

Specification 3.6.H.4. increased the margin of safety for thermal-hydraulic stability and for startup of recirculation pumps from natural circulation conditions.

I. Snubbers (Shock Suppressors)

Snubbers are designed to prevent unrestrained pipe motion under dynamic loads as might occur during an earthquake or severe transient while allowing normal thermal motion during startup and shutdown. The consequence of an inoperable snubber is an increase in the probability of structural damage to piping as a result of a seismic or other event initiating dynamic loads. It is therefore required that all snubbers required to protect the primary coolant system or any other safety system or component be operable during reactor operation.

Because the snubber protection is required only during low probability events, a period of 72 hours is allowed for repairs or replacements. In case a shutdown is required, the allowance of 36 hours to reach a cold shutdown condition will permit an orderly shutdown consistent with standard operating procedures. Since plant startup should not commence with knowingly defective safety related equipment, Specification 3.6.I.4 prohibits startup with inoperable snubbers.

When a snubber is found inoperable, a review shall be performed to determine the snubber mode of failure. Results of the review shall be used to determine if an engineering evaluation of the safety-related system or component is necessary. The engineering evaluation shall determine whether or not the snubber mode of failure has imparted a significant effect or degradation on the support component or system.

All safety related hydraulic snubbers are visually inspected for overall integrity and operability. The inspection will include verification of proper orientation, adequate hydraulic fluid level and proper attachment of snubber to piping and structures.

All safety related mechanical snubbers are visually inspected for overall integrity and operability. The inspection will include verification of proper orientation and attachments to the piping and anchor for indication of damage or impaired operability.

ATTACHMENT 2

D3C10 Evaluation of Significant Hazards Consideration

Description of Amendment Request

Commonwealth Edison proposes to amend Facility Operating License DPR-25 for Dresden Unit 3 to allow the use of Exxon 9x9 fuel, operation of the reactor in an expanded POWER/FLOW region and allow Single Loop Operation above 50% thermal power for Cycle 10.

Basis for Proposed No Significant Hazards Consideration Determination

Commonwealth Edison has evaluated the proposed Technical Specification amendment and determined that it does not represent a significant hazards consideration. Based on the criteria for defining a significant hazards consideration established in 10CFR50.92(c), operation of Dresden Unit 3 Cycle 10 in accordance with the proposed amendments will not:

1. Involve a significant increase in the probability or consequences of an accident previously evaluated because:

   a. The Exxon 9x9 fuel was first introduced to Dresden 2 Cycle 9 as Lead Test Assemblies (LTA) and these assemblies are currently going through their second cycle of irradiation. The Dresden 3 XN-3 and XN-3A reload fuel is very similar in design to the Dresden 2 LTAs with the exception in the number of water rods and Gadolinia-bearing fuel rods. The XN-3 and XN-3A 9x9 fuel thermal-hydraulic performance falls between that of the ENC 8x8 fuel and the GE 8x8 fuel indicating adequate compatibility for coresidence in the Dresden 3 core. ENC evaluated the XN-3 and XN-3A reload fuel mechanical design using the methodology which has either received prior NRC approval or is currently under NRC review. The transient analyses were performed using plant transient analysis methodology which is similar to that which was used to establish thermal margin requirements for Cycles 8 and 9. Finally, the LOCA-ECCS analysis for the 9x9 fuel was performed with generically NRC-approved methods and the results comply with 10CFR.50.46 criteria. Thus, the XN-3 and XN-3A reload 9x9 fuel design is not significantly different from those previously found acceptable to the NRC for previous reloads at Dresden 3 and 2 and therefore does not increase the probability or consequences of an accident.

b. The removal of the provisions regarding SLO from the license and the incorporation of them into the Technical Specifications, with some minor revisions and, additionally, the allowing operation in SLO above 50% power will not increase the probability or consequences of an accident because GE has previously performed analyses supporting SLO above 50% power. Furthermore, recent SLO tests performed at another plant site have demonstrated that operation in Single Loop does not represent a less stable mode of operation. ENC has evaluated the results of the GE analyses and concludes the results are also applicable for ENC reload fuel; therefore, Dresden 3 may safely operate in SLO under the conditions of the proposed license amendment. Stability monitoring surveillances consistent with Generic Letter 86-09 have been included in the proposed amendment to provide further assurance of stable reactor operation.

c. ENC has performed an Extended Load Line Limit Analysis (ELLLA) that supports operation in an expanded POWER/FLOW region. Analysis shows that transients initiated from the most limiting point of this expanded region (100/87) would be bounded by the POWER/FLOW condition at 100%/100% and thus ensure that no safety limits would be violated. For LOCA-ECCS concern, limiting LOCA break calculations were performed for the 100/87 and the 100/100 conditions. Both operating conditions were found to result in essentially identical LOCA results with the POWER/FLOW condition of 100/87 giving the slightly higher peak cladding temperature which was used to verify the adequacy of LOCA-ECCS MAPLHGR limits. By observing the MAPLHGR limits, the consequences of accidents (LOCA) remain within the existing accident criteria established for Dresden.

2. Create the possibility of a new or different kind of accident from any accident previously evaluated because:

a. 9x9 fuel has been previously used in Dresden 2 and has exhibited operating characteristics similar to conventional 8 x 8 fuel. This operating experience plus analytical results demonstrating compatible hydraulic characteristics provides assurance that the cycle 10 core characteristics will not be significantly different from previous cycles.

b. Operation in Single Loop consistent with the proposed amendment has been previously evaluated by General Electric, Exxon Nuclear Inc and the NRC. SLO in the manner proposed is similar to that approved for previous cycles at Dresden and at other facilities and incorporates restrictions and surveillances consistent with NRC requirements (Generic Letter 86-09).

c. Operation in the ELLLA region does not allow any new modes of operation nor any new equipment which could initiate or change the nature of accident sequences.

3. Involve a significant reduction in the margin of safety for the same reason as 1. above. The proposed operation with 9 x 9 fuel, modified SLO provisions and utilizing the ELLLA region has been appropriately analyzed and necessary Technical Specification operating restrictions incorporated to assure that the margin to safety is maintained consistent with the NRC requirements and previous cycles.

In consideration of the above, Commonwealth Edison believes that NRC approval of these amendments should not be predicated on satisfactory resolution of public comments or intervention as provided by for 10 CFR 50.91(a)(4).