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June 14, 1988

Mr. Thomas E. Murley, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Subject: Dresden Station Unit 2
Cycle 12 Reload Licensing Plan
NRC Docket No. 50-237

Reference: Conference Call on May 20, 1988 between NRR (M. Grotenhuis, T. Collins) and CECo (J.A. Silady, T.J. Rausch, et al).

Dear Mr. Murley:

The referenced conference call was held to discuss the impact on the reload licensing schedule of a planned change in the Dresden 2 end of Cycle 12 shutdown date from April 21, 1990 to September 1, 1990. At the conclusion of the call the NRC participants requested that a summary of the proposed licensing approach which was discussed for this reload be provided.

The requested summary is attached. Commonwealth Edison believes that this approach will allow the core loading to be redesigned in a timely fashion while meeting NRC reload licensing schedular requirements.

Please note that, subsequent to the referenced call, the end of Cycle 11 planned shutdown date has also been delayed from September 5, 1988 to October 29, 1988.

Please contact this office should further information be required.

Very truly yours,

J. A. Silady
Nuclear Licensing Administrator

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Attachment

cc: A. B. Davis - Regional Administrator, RIII
B. L. Siegel - Project Manager - NRR
S. G. DuPont - NRC Senior Resident Inspector, Dresden

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ATTACHMENT

DRESDEN 2 CYCLE 12 RELOAD LICENSING PLAN

REFERENCES 1: Letter from J.A. Silady to T.E. Murley dated March 9, 1988 transmitting Dresden 3 Cycle 11 Reload Licensing Submittal and Supporting Documents.

2: "Extended Operating Domain/Equipment Out-of-Service Analysis for Dresden Units 2 and 3" (ANF-88-069) to be submitted August, 1988.

Commonwealth Edison Company plans to move the shutdown date of Cycle 12 of Dresden 2 from April 21, 1990, to September 1, 1990. This change is necessary due to overall system energy considerations. The current schedule for the licensing of Dresden 2 Cycle 12 is therefore in jeopardy since the core will need to be redesigned to meet the higher cycle energy requirements of Cycle 12 which result from moving the outage date.

The participants of the May 20, 1988 conference call agreed in principle to the following plan to mitigate the consequences of this change in energy utilization:

1. Preparatory technical specification changes will be submitted in mid-August*, 1988 to bound the reanalysis of the Cycle 12 core. Conservative numbers will be chosen so that the amendment can be issued before the reload analysis is completed. The licensing package will include a discussion of how the final analysis will be performed with an emphasis on the use of current, approved models. The technical specification changes will also incorporate several generic improvements previously incorporated into Dresden 3 Cycle 11. These improvements include:

   (a) Modification of limits for single loop operation based on ANF analyses. Basis: ANF-87-111 (Attachment 4 to the Reference 1 submittal).

   (b) Provision for extended operation with a relief valve out of service. Basis: XN-NF-84-49 (Attachment 3 to the Reference 1 submittal).

* NOTE: On the May 20, 1988 conference call, a target of mid-July was discussed. Subsequent to the conference call, the Dresden 2 shutdown date for end of Cycle 11 has been changed from September 5, 1988 to October 29, 1988. As a result, CECo now plans to submit the preparatory amendment by mid-August.

(c) Analyses which support operation, including coastdown, with reduced feedwater heating. Basis: ANF-87-096 (Attachment 2 to the Reference 1 submittal) for Dresden 3 Cycle 11 and ANF-88-069 (Reference 2) a generic evaluation to be submitted with the preparatory amendment for Dresden 2 Cycle 12.

(d) Explicit definition and incorporation of ANF's steady-state and transient linear heat generation rate ratios, FDLRX and FDLRC, into the technical specifications.

(e) Update text, exclusive of document titles, to "ANF" from "ENC".

These modifications do not require cycle-specific analyses.

2. Subject to completion of the CECo reviews of the re-analyses of the Cycle 12 core redesign, the reload will be licensed under 10 CFR 50.59, thereby requiring no new technical specifications beyond the preparatory modifications approved under Item 1. This assumes that the reload On-Site and Off-Site Reviews identify no unreviewed safety questions or additional technical specification changes. Limits will be chosen for the Item 1 amendment such that there is a high confidence in this assumption.

CECo believes this strategy will allow the core to be redesigned in a timely fashion while meeting the licensing schedule constraints and all NRC requirements.