Commonwealth Edison
One First National Plaza, Chicago, Illinois
Address Reply to: Post Office Box 767
Chicago, Illinois 60690 - 0767

November 23, 1988

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

Subject: Dresden Nuclear Power Station Units 2 and 3
Interim Operating Restrictions to Preclude
Regional Neutron Flux Instabilities
NRC Docket Nos. 50-237 and 50-249

References (a): D.N. Grace (BWROG Chairman) letter to BWROG Executives, "Interim Recommendations For Stability Actions", dated November 3, 1988.

(b): D.P. Galle letter to BWR Station Managers "General Electric Interim Operating Restrictions to Preclude Regional Instabilities", dated November 4, 1988.

(c): Dresden Operating Order #18-88, "Interim Operating Restrictions to Preclude Regional Instabilities", dated November 9, 1988.

Dear Dr. Murley:

As a result of generic analyses following the LaSalle neutron flux oscillation event, GE recommended interim operating restrictions in Reference (a) to prevent regional oscillations to the BWR Owners' Group Stability Committee. To ensure compatibility and compliance with the GE recommendations, CECo BWRs were directed in Reference (b) to implement interim operating restrictions which are more conservative than the GE recommendations. Based on the restrictions listed in Reference (b), a Dresden Operating Order, Reference (c), was implemented to restrict operation as follows:

1. Normal operation below 45% core flow should be allowed only when below the 80% Flow Control Line (FCL).

2. In order to prevent operating above the 100% FCL at low flow conditions (i.e., during a recirculation pump trip or run-back) normal operation should be restricted to below the 100% FCL with sufficient margin to account for expected xenon transients.

A001
1/0

3. If, for unforseen reasons, the unit inadvertently enters the region above the 100% FCL while below 45% core flow, a manual scram should be implemented immediately.

4. If, for unforseen reasons, the unit inadvertently enters the region between the 80% and 100% FCL while below 45% core flow, immediate actions to exit the region are required. Either insertion of control rods or increasing recirculation flow are appropriate actions provided core flow can be increased immediately. Starting a recirculation pump to exit this region is inappropriate. If core thermal hydraulic instability occurs in this region, a manual scram should be implemented immediately. Evidence of thermal hydraulic instability consists of APRM and LPRM peak-to-peak oscillations of greater than 10%.

Items 1, 3 and 4 of the above operating restrictions are equivalent to or more conservative than the Reference (a) recommendations and will remain in effect until further study and/or revised recommendations resolve industry and NRC staff concerns with regional oscillations. Item 2 is an additional precaution which may be removed by CECo after further evaluation and discussion with General Electric Company. CECo will notify both NRR and Region III if changes are made to these restrictions.

Please contact this office should further information be required.

Very truly yours,

J. A. Silady
Nuclear Licensing Administrator

lm

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

5370K