



**Commonwealth Edison**  
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October 30, 1989

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  
Proposed Amendment to Remove Cycle-Specific  
Core Limits from the Technical Specifications  
NRC Docket Nos. 50-237 and 50-249

References (a): Generic Letter 88-16 dated October 4, 1988.

(b): Letter from T.M. Ross to T.J. Kovach dated  
October 20, 1989.

Dr. Murley:

Pursuant to 10 CFR 50.90, Commonwealth Edison proposes to amend the Technical Specifications (Appendix A) of Provisional Operating License DPR-19 and Facility Operating License DPR-25 for Dresden Nuclear Power Station Units 2 and 3, respectively. The proposed amendment deletes cycle-specific core limits from the Technical Specifications consistent with the guidance in the referenced Generic Letter.

As suggested in the Reference (a) Generic Letter, the values of the removed core limits will be contained in a Core Operating Limits Report (COLR), which is referenced in each of the respective Limiting Conditions for Operation (LCO). Similar amendments have been previously approved for the Oconee and Brunswick plants and, more recently, for CECO's Quad Cities Units 1 and 2 as documented in Reference (b). The Dresden changes are described in Enclosure A including a safety evaluation summary. The affected pages of the Technical Specifications are contained in Enclosure C.

The proposed changes have been reviewed and approved by both On-Site and Off-Site Review in accordance with Commonwealth Edison procedures. We have reviewed these proposed amendments in accordance with 10 CFR 50.92(c) and determined that No Significant Hazards Consideration exists. This evaluation is documented in Enclosure B.

Enclosure D provides examples of the COLR for both Dresden units. As suggested in the Generic Letter and specified in the proposed Section 6 administrative requirement, CECO will provide final versions of these reports for each future Dresden reload beginning with Unit 3 Cycle 12 (Reload 11), which is currently scheduled to start in February, 1990. In addition, the

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example COLR for the current cycle of Dresden Unit 2 will be finalized and provided at the same time as the Dresden 3 Cycle 12 COLR in order to support simultaneous implementation of the proposed amendment for both units.

Whenever appropriate, future reloads will be reviewed by CECO per 10 CFR 50.59 in order to realize the full benefits of the Generic Letter 88-16 approach, including reduced NRC resources for reload reviews. Since the Unit 3 Cycle 12 reload utilizes NRC-approved fuel types, analytical methodologies, etc., CECO believes that 10 CFR 50.59 can be applied, provided this amendment is processed in a timely manner.

Commonwealth Edison is notifying the State of Illinois of our application for this amendment by transmitting a copy of this letter and its attachments to the designated State Official.

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

Very truly yours,

*J.A. Silady*

J.A. Silady  
Nuclear Licensing Administrator

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- Enclosures A: Description of Proposed Changes and Safety Evaluation
- B: Significant Hazards Evaluation
- C: Proposed Changes to Appendix A Technical Specifications for Dresden Units 2 and 3
- D: Examples of Core Operating Limits Reports

- cc: A.B. Davis - Regional Administrator, Region III
- S.G. DuPont - Senior Resident Inspector - Dresden
- B.L. Siegel - Project Manager, NRR
- D.R. Hoffman - Excel Services
- Office of Nuclear Facility Services - IDNS

SUBSCRIBED AND SWORN to before me this 30<sup>th</sup> day of October, 1989

*Levia F. Mayo*  
Notary Public

