Commonwealth Edison
1400 Opus Place
Downers Grove, Illinois 60515

January 24, 1992

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

Attn: Document Control Desk

Subject: Dresden Nuclear Power Station
Unit 3 Cycle 13 Reload and COLR
Unit 2 COLR Revision
NRC Docket No. 50-237 and 50-249

References: (a) B. Siegel (NRC) letter to T. Kovach (CECo), Approving Technical Specification Amendment and Core Operating Limits Report per Generic Letter 88-16, dated February 8, 1990.

(b) M. Richter (CECo) letter to U.S. NRC, Response to NRC Bulletin 90-02, dated April 26, 1990.

(c) P. Eng (NRC) letter to T. Kovach (CECo), Approving Commonwealth Edison Response to NRC Bulletin 90-02, dated June 5, 1990.

(d) B. Siegel (NRC) letter to T. Kovach (CECo), Issuance of Amendments TAC No. 79966, dated August 5, 1991.

Dear Dr. Murley:

Dresden Unit 3, which has completed its twelfth cycle of operation, is currently preparing for Cycle 13 startup (estimated startup date is February, 17, 1992). The purpose of this letter is to advise you of the Commonwealth Edison Company (CECo) review and approval of the Cycle 13 reload under the provisions of 10 CFR 50.59, and to transmit the Core Operating Limits Report (COLR) for the upcoming cycle consistent with Generic Letter 88-16. As described below, a mid-cycle revision to the Dresden 2 Cycle 13 COLR has also been included for your information (Attachment 2). The Technical Specification amendment to incorporate the COLR for Dresden was previously approved by Reference (a).

The Dresden Unit 3 Cycle 13 core, which consists of NRC approved fuel types developed by Siemens Nuclear Power (SNP), formally Advanced Nuclear Fuels, was designed to operate under currently approved fuel design parameters, Technical Specifications and related bases such that:

- core operating characteristics will be equivalent to or less limiting than those previously reviewed and accepted; or
- reanalysis has been performed to demonstrate that the postulated FSAR events which could potentially be affected by the reload are within allowable limits.

The reload licensing analyses performed for Cycle 13 utilized NRC approved methodologies. The cycle-specific power distribution limits for Cycle 13 are presented in the Attachment 1 COLR.

For the Unit 3 reload, it should be noted that CECo has recently completed an evaluation which supports a 3% increase in the Rod Block Monitor (RBM) setpoints at both Dresden Units 2 and 3. The objective of the setpoint change was to reduce intermittent and unnecessary control room alarms which have proven to be counterproductive to error-free control rod manipulation. This evaluation considered the impact on fuel operating limits for the current Dresden 2 Cycle 13 and all future reloads at Dresden including Dresden 3 Cycle 13. The provisions of 10 CFR 50.59 have been satisfied for the revised RBM setpoints which have been reviewed and approved by Edison's On-Site and Off-Site Review functions. The Attachment 1 and 2 COLRs for the upcoming Dresden 3 Cycle 13 and the current Dresden 2 Cycle 13, respectively, include the revised RBM setpoints and are provided for your information consistent with Generic Letter 88-16.

CECo has performed a detailed review of the relevant licensing documents, the associated bases, and references. Based on that review, a safety evaluation was prepared, as required by 10 CFR 50.59, which concludes that the reload presents no unreviewed safety questions, and that no revisions to the current Technical Specifications are required as a result of the reload. The On-Site and Off-Site Review of the reload 10 CFR 50.59 evaluation is in progress and will be completed prior to the startup of Cycle 13. Note that a Technical Specification amendment for Dresden Station Unit 3 was previously submitted and approved by the NRC, (Reference (d)). This Technical Specification change incorporated SNP's methodologies and increased the Safety Limit Minimum Critical Power Ratio (SLMCPR) from 1.05 to 1.08.

NRC Bulletin 90-02 addressed the loss of thermal margin caused by fuel channel bow, and requested BWR licensees to account for the effects of fuel channel bow during all subsequent reloads. Reference (b) presented CECo's response to the Bulletin, and NRR's approval of that response was received in Reference (c). Dresden Station Unit 3 Cycle 13 will not utilize any reused second bundle lifetime channels.

Finally, verification of the reload core design will be performed during startup testing. The startup tests will be consistent with Technical Specifications and the Draft-Regulatory Guide (Task SC 521-4). A summary of the results of key startup tests will be transmitted within 90 days following the resumption of commercial operation.

Based on the previous discussion, CECo has concluded that NRC review and approval of the Dresden Unit 3 reload analyses are not required for resumption of operation with the Cycle 13 core.

Please contact this office should further information be required.

Respectfully,

Peter L. Piet
Nuclear Licensing Administrator

Attachments: 1) COLR for Dresden Unit 3 Cycle 13
2) Revised COLR for Dresden 2 Cycle 12

cc: A.B. Davis, Regional Administrator, Region III
B.L. Siegel, NRR Project Manager
W.G. Rogers, Senior Resident Inspector, Dresden

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