

Commonwealth Edison Company

ONE FIRST NATIONAL PLAZA * CHICAGO, ILLINOIS

Address Reply to

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August 18, 1971

Dr. Peter A. Morris, Director Division of Reactor Licensing U.S. Atomic Energy Commission Washington, D.C. 20545

Subject: Correction to Proposed Modification No. 71-3

to the Safety Analysis Report, DPR-25, AEC Dkt 50-249, to eliminate steam separator-dryer

tests on Dresden Unit 3

Dear Dr. Morris:

In a letter dated August 12, 1971, we sent you Proposed Modification 71-3 to the Dresden 2/3 Safety Analysis Report. Attached to our letter was a page change and a Safety Evaluation. The page change submitted contained an error. The purpose of this letter is to transmit a new corrected page 13.8-1 to replace that page previously sent on August 12.

In addition to three signed originals, 77 copies of this correction are also provided.

Very truly yours,

For Byron Lee, Jr.

Assistant to the President

Wayne L. Stied

SUBSCRIBED and SWORN to before me this day of Number 1971

Notary Public

DOCKETED USAEC

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13.8 STARTUP AND POWER TEST PROGRAM

13. 8.1 General Requirements: The startup and power test program is performed to assure that the plant is capable of operating safely and satisfactorily. Systems and components, which cannot be fully checked out in pre-operational test phase, are tested at power during this phase of the unit startup to confirm reactor parameters and characteristics determined by an extensive program of analysis and tests executed prior to initial fuel loading. The nuclear characteristics of fuel, control rods and control curtains are calculated with methods which are continuously compared with results of experiments in the Vallecitos Atomic Laboratory's critical facilities, including measurements of simular or identical components. In addition, startup tests and operating data from other boiling water reactors in commercial operation and other measurements throughout the nuclear industry are used to confirm the applicability of the analytical methods.

The tests listed in 13.8.3, 13.8.4 and 13.8.5 will be conducted on Dresden Unit 2 and the results will be considered in preparing the specific tests to be performed in Unit 3.

Tests which are unnecessary for Unit 3 are: 13.8.3g, Control Rod Sequence; 13.8.5s, Calibration of Rods; 13.8.5u, Rod Pattern Exchange and 13.8.4k, 13.8.5v, Steam Separator-Dryer Measurements. Tests which will be modified depending on the Unit 2 results, to collect a limited amount of data are: 13.8.3c, Radiation Measurements; 13.8.3d, Vibration Measurements; 13.8.3h, SRM Performance, 13.8.5h, Recirculation Jet Pumps and 13.8.5t, Axial Power Distribution.

- 13.8.2 General Procedures: The startup procedures will be written, with individual detailed sub-sections.
- 13.8.3 <u>Fuel Loading and Tests at Atmospheric Pressure</u>: The initial fuel loading and critical testing are performed at near-zero power, and at atmospheric pressure, with the reactor pressure vessel open.

 The following tests are performed during this phase of the startup program:
 - a. Chemical and Radiochemical tests are conducted to establish water conditions prior to initial operation and to maintain these throughout the test program. Chemical and radiochemical checks are made at primary coolant, off-gas exhaust, waste and auxillary system sample locations. Base or background radioactivity levels are determined at this time for use in fuel assembly failure detection and long range activity buildup studies.
 - b. Control Rod Drive System tests are performed on all drives prior to fuel loading to assure proper operability and to measure and adjust operating speeds. Drive line friction and scram times are determined for all drives at zero reactor pressure. Functional testing of each drive is performed with dummy fuel just prior to and then following the fuel loading in each cell.
 - c. Radiation Measurements are made prior to nuclear operation to establish base levels in the plant and the nearby environs.