

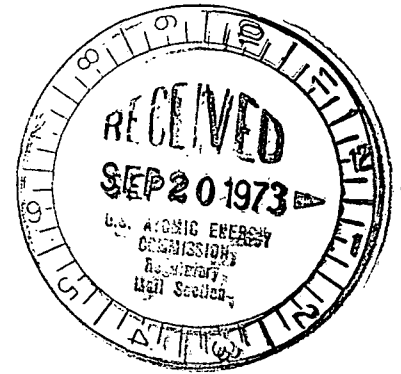


**Commonwealth Edison**  
 One First National Plaza, Chicago, Illinois  
 Address Reply to: Post Office Box 767  
 Chicago, Illinois 60690

**Regulatory**

Cy.

September 14, 1973



Mr. J. F. O'Leary, Director  
 Directorate of Licensing  
 Office of Regulation  
 U.S. Atomic Energy Commission  
 Washington, D.C. 20545

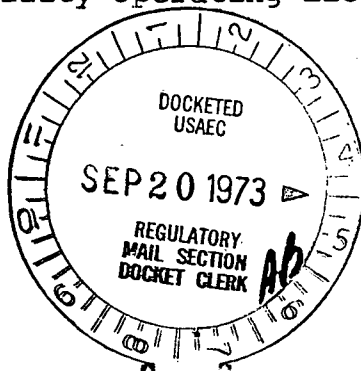
Subject: Dresden Unit 3 Second Reload Associated  
 Technical Specification Changes, AEC Dkt 50-249

Dear Mr. O'Leary:

It is planned to begin the next Dresden Unit 3 refueling outage on January 15, 1974. The reloaded core is to include a number of fuel assemblies containing fuel rods in an 8 x 8 array. A topical report on this fuel, NEDO-20103, "Generic Design Information for General Electric BWR Reload Fuel," which describes the 8 x 8 fuel assembly, has been previously submitted by General Electric Company. The enclosed document, "Dresden 3 Nuclear Power Station, Second Reload License Submittal," provides a complete description of the reloaded core and technical justification for including sixty 8 x 8 assemblies in the second reload. A detailed analysis of potential densification in the 8 x 8 fuel will be completed by December 1, 1973, shortly after the as-fabricated pellet density is determined.

It is anticipated that only approximately 40 of the 8 x 8 assemblies will be available by January, 1974. The rest of the reload batch will be comprised of regular 7 x 7 assemblies. It is also possible that the core may contain more than 60 new assemblies. Further information on these modifications to the refueling plans will be supplied by November 1, 1973. These are minor modifications and it is not anticipated that they will in any way hinder the review of the enclosed document according to the Commission's previously announced schedule.

Pursuant to Section 50.59 of 10 CFR Part 50 and Paragraph 3.B of Facility Operating License DPR-25, Commonwealth



7070

Commonwealth Edison Company

Mr. J. F. O'Leary

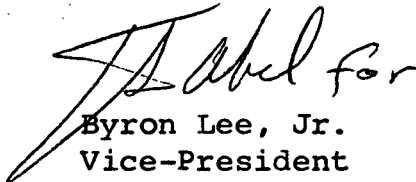
- 2 -

September 14, 1973

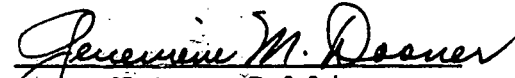
Edison hereby submits proposed changes to Appendix A of DPR-25 which authorizes the operation of Dresden Unit 3. The purpose of these changes is to include references to the enclosed document in the bases for the Safety Limits and a change to the bases for Limiting Conditions of Operation to encompass the analysis set forth in this document. Revised Technical Specification pages containing the proposed changes are enclosed.

Three signed originals and 37 copies are being provided.

Very truly yours,

  
Byron Lee, Jr.  
Vice-President

SUBSCRIBED and SWORN to  
before me this 14th day  
of September 1973.

  
Notary Public  
My Commission Expires April 12, 1975

in detail (3). In addition, control rod scrams are such that for normal operating transients the neutron flux transient is terminated before a significant increase in surface heat flux occurs. Scram times of each control rod are checked each refueling outage to assure the insertion times are adequate. Exceeding a neutron flux scram setting and a failure of the control rods to reduce flux to less than the scram setting within 1.5 seconds does not necessarily imply that fuel is damaged; however, for this specification a safety limit violation will be assumed any time a neutron flux scram setting is exceeded for longer than 1.5 seconds.

If the scram occurs such that the neutron flux dwell time above the limiting safety system setting is less than 1.7 seconds, the safety limit will not be exceeded for normal turbine or generator trips, which are the most severe normal operating transients expected. These analysis show that even if the bypass system fails to operate, the design limit of MCHFR = 1.0 is not exceeded. Thus, use of a 1.5 second limit provides additional margin.

The computer provided with Dresden Units 2 and 3 has a sequence annunciation program which will indicate the sequence in which scrams occur such as neutron flux, pressure, etc. This program also indicates when the scram setpoint is cleared. This will provide information on how long a scram condition exists and thus provide some measure of the energy added during a transient. Thus, computer information normally will be available for analyzing scrams; however, if the computer information should not be available for any scram analysis, Specification 1.1. C. 2 will be relied on to determine if a safety limit has been violated.

During periods when the reactor is shut down, consideration must also be given to water level requirements due to the effect of decay heat. If reactor water level should drop below the top of the active fuel during this time, the ability to cool the core is reduced. This reduction in core cooling capability could lead to elevated cladding temperatures and clad perforation. The core will be cooled sufficiently to prevent clad melting should the water level be reduced to two-thirds the core height. Establishment of the safety limit at 12 inches above the top of the fuel provides adequate margin. This level will be continuously monitored whenever the recirculation pumps are not operating.

The proposed fuel operating conditions for Unit 3 reflect linear power generation rates and exposures higher than those experienced previously in BWR plants. Additional experimental data beyond that presented in Amendment 15 of the SAR will be obtained to further support the proposed combinations of fuel linear power generation rates and exposures, considering both normal and anticipated transient modes of operation. To develop these data for further assurance of fuel integrity under all modes of plant operation, a surveillance program on BWR fuel which operates beyond current production fuel experience will be undertaken. The schedule of inspections will be contingent on the availability of the fuel as influenced by plant operating and facility requirements. The program, as outlined in Amendment 17 of the SAR, will include surveillance of reactor plant off-gas activity, relevant plant operating data and fuel inspection.

(3) SAR, Section 4.4.3 for turbine trip and load reject transients, Section 4.3.3 for flow control full coupling demand transient, and Section 11.3.3 for maximum feedwater flow transient.

also: "Dresden Second Reload License Submittal", transmitted on September 14, 1973, from Commonwealth Edison to J.F. O'Leary, U.S. Atomic Energy Commission.

- E. Turbine Stop Valve Scram — The turbine stop valve scram like the load rejection scram anticipates the pressure, neutron flux, and heat flux increase caused by the rapid closure of the turbine stop valves and failure of the bypass. With a scram setting at 10% of valve closure the resultant increase in surface heat flux is the same as for the load rejection and thus adequate margin exists. No perceptible change in MCHFR occurs during the transient. Ref. Section 11.2.3 SAR; "Dresden 3 Second Reload License Submittal," 9/14/73.
- F. Generator Load Rejection Scram — The generator load rejection scram is provided to anticipate the rapid increase in pressure and neutron flux resulting from fast closure of the turbine control valves due to a load rejection and subsequent failure of the bypass; i. e., it prevents MCHFR from becoming less than 1.0 for this transient. For the load rejection from 100% power, the heat flux increases to only 106.5% of its rated power value which results in only a small decrease in MCHFR. Ref. Section 4.4.3 SAR; "Dresden 3 Second Reload License Submittal," 9/14/73.
- G. Reactor Coolant Low Pressure Initiates Main Steam Isolation Valve Closure — The low pressure isolation at 850 psig was provided to give protection against fast reactor depressurization and the resulting rapid cooldown of the vessel. Advantage was taken of the scram feature which occurs when the main steam line isolation valves are closed to provide for reactor shutdown so that operation at pressures lower than those specified in the thermal hydraulic safety limit does not occur, although operation at a pressure lower than 850 psig would not necessarily constitute an unsafe condition.

- H. Main Steam Line Isolation Valve Closure Scram — The low pressure isolation of the main steam lines at 850 psig was provided to give protection against rapid reactor depressurization and the resulting rapid cooldown of the vessel. Advantage was taken of the scram feature which occurs when the main steam line isolation valves are closed, to provide for reactor shutdown so that high power operation at low reactor pressure does not occur, thus providing protection for the fuel cladding integrity safety limit. Operation of the reactor at pressures lower than 850 psig requires that the reactor mode switch be in the startup position where protection of the fuel cladding integrity safety limit is provided by the IRM high neutron flux scram. Thus, the combination of main steam line low pressure isolation and isolation valve closure scram assures the availability of neutron flux scram protection over the entire range of applicability of the fuel cladding integrity safety limit. In addition, the isolation valve closure scram anticipates the pressure and flux transients which occur during normal or inadvertent isolation valve closure. With the scrams set at 10% valve closure there is no increase in neutron flux.

Bases:

1.2 The reactor coolant system integrity is an important barrier in the prevention of uncontrolled release of fission products. It is essential that the integrity of this system be protected by establishing a pressure limit to be observed for all operating conditions and whenever there is irradiated fuel in the reactor vessel.

The pressure safety limit of 1325 psig as measured by the vessel steam space pressure indicator is equivalent to 1375 psig at the lowest elevation of the reactor coolant system. The 1375 psig value is derived from the design pressures of the reactor pressure vessel, coolant system piping and isolation condenser. The respective design pressures are 1250 psig at 575°F, 1175 psig at 560°F, and 1250 psig at 575°F. The pressure safety limit was chosen as the lower of the pressure transients permitted by the applicable design codes: ASME Boiler and Pressure Vessel Code, Section III for the pressure vessel and isolation condenser and USASI B31.1 Code for the reactor coolant system piping. The ASME Boiler and Pressure Vessel Code permits pressure transients up to 10% over design pressure (110% X 1250 = 1375 psig), and the USASI Code permits pressure transients up to 20% over the design pressure (120% X 1175 = 1410 psig). The Safety Limit pressure of 1375 psig is referenced to the lowest elevation of the primary coolant system.

The design basis for the reactor pressure vessel makes evident the substantial margin of protection against failure at the safety pressure limit of 1375 psig. The vessel has been designed for a general membrane stress no greater than 26,700 psi at an internal pressure of 1250 psig; this is a factor of 1.5 below the yield strength of 40,100 psi at 575°F. At the pressure limit of 1375 psig, the general membrane stress will only be 29,400 psi, still safely below the yield strength.

The relationships of stress levels to yield strength are comparable for the isolation condenser and primary system piping and provide a similar margin of protection at the established safety pressure limit.

The normal operating pressure of the reactor coolant system is 1000 psig. For the turbine trip or loss of electrical load transients the turbine trip scram or generator load rejection scram, together with the turbine bypass system limit the pressure to approximately 1100 psig (4). In addition, pressure relief valves have been provided to reduce the probability of the safety valves operating in the event that the turbine bypass should fail. These valves and the neutron flux scram limit the reactor pressure to 1180 psig (5) which is 30 psi below the setting of the first safety valve. Finally, the safety valves are sized to keep the reactor coolant system pressure below 1375 psig with no credit taken for the relief valves or turbine bypass system. Credit is taken for the neutron flux scram however.

Reactor pressure is continuously monitored in the control room during operation on a 1500 psi full scale pressure recorder.

---

(4) SAR Section 11.2.2. } also: "Dresden 3 Second Reload License Submittal",  
(5) SAR Section 4.4.3. } 9/14/73

Bases:

2.2 In compliance with Section III of the ASME Code, the safety valves must be set to open at no higher than 103% of design pressure, and they must limit the reactor pressure to no more than 110% of design pressure. Both the high pressure scram and safety valve actuation are required to prevent overpressurizing the reactor pressure vessel and thus exceeding the pressure safety limit. The pressure scram is actually a backup protection to the high flux scram which was analyzed in Section 4.4.3 of the SAR and re-examined in the Dresden 3 Second Reload License submittal, September 14, 1973.

failure of the turbine stop valve closure scram, failure of the bypass system to actuate and failure of the relief valves to open) the pressure would rise rapidly due to void reduction in the core. A high pressure scram would occur at 1060 psig. The pressure at the bottom of the vessel is about 1240 psig when the first safety valve opens and about 1280 psig when the last valve opens. Both values are clearly within the code requirements. Vessel dome pressure reaches about 1305 psig with the peak at the bottom of the vessel near 1330 psig. Therefore, the pressure scram and safety valve actuation provide adequate margin below the peak allowable vessel pressure of 1375 psig.

Two sensors on the isolation condenser supply and return lines are provided to detect the failure of isolation condenser line and actuate isolation action. The sensors on the supply and return sides are arranged in a 1 out of 2 logic and, to meet the single failure criteria, all sensors and instrumentation are required to be operable. The trip settings of 20 psig and 32" of water and valve closure time are such as to prevent uncovering the core or exceeding site limits. The sensors will actuate due to high flow in either direction.

The HPCI high flow and temperature instrumentation are provided to detect a break in the HPCI piping. Tripping of this instrumentation results in actuation of HPCI isolation valves; i. e., Group 4 valves. Tripping logic for this function is the same as that for the isolation condenser and thus all sensors are required to be operable to meet the single failure criteria. The trip settings of 200°F and 300% of design flow and valve closure time are such that core uncover is prevented and fission product release is within limits.

The instrumentation which initiates ECCS action is arranged in a dual bus system. As for other vital instrumentation arranged in this fashion the Specification preserves the effectiveness of the system even during periods when maintenance or testing is being performed.

The control rod block functions are provided to prevent excessive control rod withdrawal so that MCHFR does not decrease to 1.0. The trip logic for this function is 1 out of n; e. g., any trip on one of the six APRM's, 8 IRM's, or 4 SRM's will result in a rod block. The minimum instrument channel requirements assure sufficient instrumentation to assure the single failure criteria is met. The minimum instrument channel requirements

for the RBM may be reduced by one for a short period of time to allow for maintenance, testing, or calibration. This time period is only ~3% of the operating time in a month and does not significantly increase the risk of preventing an inadvertent control rod withdrawal.

The APRM rod block function is flow biased and prevents a significant reduction in MCHFR especially during operation at reduced flow. The APRM provides gross core protection; i. e., limits the gross core power increase from withdrawal of control rods in the normal withdrawal sequence. The trips are set so that MCHFR is maintained greater than 1.0

\*The APRM rod block which is set at 12% of rated power is functional in the refuel and Startup/Hot Standby mode. This control rod block provides the same type of protection in the refuel and Startup/Hot Standby mode as the APRM flow biased rod block does in the Run mode; i. e., it prevents MCHFR from decreasing below 1.0 during control rod withdrawals and prevents control rod withdrawal before a scram is reached.

The RBM rod block function provides local protection of the core; i. e., the prevention of critical heat flux in a local region of the core, for a single rod withdrawal error from a limiting control rod pattern. The trip point is flow biased. The worst case single control rod withdrawal error has been analyzed and the results show that with the specified trip settings rod withdrawal is blocked when MCHFR is ~1.06, thus allowing adequate margin. Ref. Section 7.4.5.3 SAR. Below ~70% power the worst case withdrawal of a single control rod results in a MCHFR > 1.0 without rod block action, thus below this level it is not required.