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ISHAM, LINCOLN & BEALE

## July 14, 1982

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EDWARD S. ISHAM, 1872-1992 ROBERT T LINCOLN, 1872-1889 WILLIAM G. BEALE, 1885-1923

## UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION

## THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of	)	Docket N	los.	50-237-SP
COMMONWEALTH EDISON COMPANY	)			50-249-SP
(Dresden Station, Units 2&3)	)	(Spent F	uel	Pool Modification)

## Dear Administrative Judges,

This letter is to inform you of a recent development which might be considered relevant to this proceeding. Commonwealth Edison Company (Commonwealth Edison) is currently considering the possibility of installing four 9x9 Lead Test Assemblies (LTA's) in the reactor core for Dresden Unit 2 during the Unit 2 refueling outage scheduled for January, 1983. The purpose of inserting the four LTA's is to provide information necessary for future decisions concerning the use of 9x9 fuel assemblies. If Commonwealth Edison decides to install the four 9x9 LTA's, they would be manufactured by Exxon Nuclear Company, and would be stored in the spent fuel pool for Dresden Unit 2 until inserted into the reactor core.

Commonwealth Edison will ensure that documentation exists, including the performance of any necessary analyses, to verify that, following insertion of the four LTA's in the new high density storage racks, Keff will be less than 0.95. Commonwealth Edison will also verify that the radiological effects of a refueling accident involving a 9x9 LTA will not exceed 10 CFR Part 100 limits. Finally, the four LTA's will utilize fuel channels of the design described in the testimony of Dr. O'Boyle, and therefore will not alter any of the testimony presented to the Board on the issue of fuel channel deformation. Consequently, we believe that the possible installation and use of these LTA's as outlined herein will not present any health or safety issues and should not affect approval of the proposal to install the remainder of the high density storage racks.

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Respectfully submitted, Rut 9 Jallin J. Robert G. Fitzgibbons, Jr.