

Mr. Oliver D. Kingsley, President  
Exelon Nuclear  
Exelon Generation Company, LLC  
4300 Winfield Road  
Warrenville, IL 60555

November 2, 2001

SUBJECT: ISSUANCE OF AMENDMENTS (TAC NOS. MB0170, MB0171, MB1337,  
MB1338, MB2715, AND MB2716)

Dear Mr. Kingsley:

The U.S. Nuclear Regulatory Commission (Commission) has issued the enclosed Amendment No. 188 to Facility Operating License No. DPR-19 and Amendment No. 183 to Facility Operating License No. DPR-25 for Dresden Nuclear Power Station, Units 2 and 3. The amendments are in response to your application dated September 29, 2000, as supplemented by letters dated March 1, July 13, August 9, August 13, and October 17, 2001. The September 29, 2000, application was submitted by the Commonwealth Edison Company (ComEd), which merged to form Exelon Generation Company, LLC (EGC, or the licensee). By letter dated February 7, 2001, EGC assumed responsibility for all pending NRC actions requested by ComEd.

The amendments change the technical specifications to reflect a change in fuel vendors from Siemens Power Corporation to General Electric, and a transition to GE14 fuel. As part of the transition, changes are made to the number of required automatic depressurization system valves and to the time delay relay settings on emergency core cooling system pumps.

A copy of the Safety Evaluation is also enclosed. The Notice of Issuance will be included in the Commission's biweekly Federal Register notice.

Sincerely,

**/RA/**

Stewart N. Bailey, Project Manager, Section 2  
Project Directorate III  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Docket Nos. 50-237 and 50-249

Enclosures: 1. Amendment No. 188 to DPR-19  
2. Amendment No. 183 to DPR-25  
3. Safety Evaluation

cc w/encls: See next page

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The amendments change the technical specifications to reflect a change in fuel vendors from Siemens Power Corporation to General Electric, and a transition to GE14 fuel. As part of the transition, changes are made to the number of required automatic depressurization system valves and to the time delay relay settings on emergency core cooling system pumps.

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\*see previous concurrence

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EXELON GENERATION COMPANY, LLC

DOCKET NO. 50-237

DRESDEN NUCLEAR POWER STATION, UNIT 2

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 188  
License No. DPR-19

1. The Nuclear Regulatory Commission (the Commission) has found that:
  - A. The application for amendment by the Exelon Generation Company, LLC (the licensee) dated September 29, 2000, as supplemented by letters dated March 1, July 13, August 9, August 13, and October 17, 2001, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
  - B. The facility will operate in conformity with the application, the provisions of the Act and the rules and regulations of the Commission;
  - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
  - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
  - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment and paragraph 2.C.(2) of Facility Operating License No. DPR-19 is hereby amended to read as follows:

(2) Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No. 188, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of the date of its issuance and shall be implemented prior to reaching Startup (i.e., Mode 2) following refueling outage 17, scheduled for completion November 2001.

FOR THE NUCLEAR REGULATORY COMMISSION

*/RA/*

Anthony J. Mendiola, Chief, Section 2  
Project Directorate III  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Attachment:  
Changes to the Technical  
Specifications

Date of Issuance: November 2, 2001

EXELON GENERATION COMPANY, LLC

DOCKET NO. 50-249

DRESDEN NUCLEAR POWER STATION, UNIT 3

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 183  
License No. DPR-25

1. The Nuclear Regulatory Commission (the Commission) has found that:
  - A. The application for amendment by the Exelon Generation Company, LLC (the licensee) dated September 29, 2000, as supplemented by letters dated March 1, July 13, August 9, August 13, and October 17, 2001, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
  - B. The facility will operate in conformity with the application, the provisions of the Act and the rules and regulations of the Commission;
  - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
  - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
  - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment and paragraph 3.B. of Facility Operating License No. DPR-25 is hereby amended to read as follows:

B. Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No. 183, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of the date of its issuance and shall be implemented prior to reaching Startup (i.e., Mode 2) following refueling outage 17, scheduled for completion in October 2002.

FOR THE NUCLEAR REGULATORY COMMISSION

*/RA/*

Anthony J. Mendiola, Chief, Section 2  
Project Directorate III  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Attachment:  
Changes to the Technical  
Specifications

Date of Issuance: November 2, 2001



ATTACHMENT TO LICENSE AMENDMENT NOS. 188 AND 183

FACILITY OPERATING LICENSE NOS. DPR-19 AND DPR-25

DOCKET NOS. 50-237 AND 50-249

Revise the Appendix A Technical Specifications by removing the pages identified below and inserting the attached pages. The revised pages are identified by the captioned amendment number and contain marginal lines indicating the area of change.

REMOVE

1.1-4  
1.1-5  
3.1.4-3  
3.2.4-1  
3.2.4-2  
3.3.5.1-9  
3.3.5.1-10  
3.5.1-1  
3.5.1-2  
3.5.1-3  
3.5.1-4  
3.5.1-6  
5.6-4

INSERT

1.1-4  
1.1-5  
3.1.4-3  
3.2.4-1  
3.2.4-2  
3.3.5.1-9  
3.3.5.1-10  
3.5.1-1  
3.5.1-2  
3.5.1-3  
3.5.1-4  
3.5.1-6  
5.6-4

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION  
RELATED TO AMENDMENT NO. 188 TO FACILITY OPERATING LICENSE NO. DPR-19  
AND AMENDMENT NO. 183 TO FACILITY OPERATING LICENSE NO. DPR-25  
EXELON GENERATION COMPANY, LLC  
DRESDEN NUCLEAR POWER STATION, UNITS 2 AND 3  
DOCKET NOS. 50-237 AND 50-249

1.0 INTRODUCTION

By letter dated September 29, 2000, as supplemented by letters dated March 1, July 13, August 9, August 13, and October 17, 2001, the licensee requested an amendment to the Dresden Nuclear Power Station (DNPS), Units 2 and 3, operating licenses to support a change in fuel vendor from Siemens Power Corporation (SPC) to General Electric (GE), and a transition to GE-14 fuel. The September 29, 2000, application was submitted by the Commonwealth Edison Company (ComEd), which merged to form Exelon Generation Company, LLC (EGC, or the licensee). By letter dated February 7, 2001, EGC assumed responsibility for all pending NRC actions requested by ComEd.

The September 29, 2000, application requested changes that reflect the GE approach to analyzing the core. Specifically, the licensee requested revisions to the technical specification (TS) thermal limit descriptions, the control rod scram times, and the Core Operating Limits Report (COLR) analytical methods. The application included changes to the then-current technical specifications and the improved technical specifications (ITS). The licensee had applied to convert DNPS to the ITS by letter dated March 3, 2000. The ITS were approved for DNPS on March 30, 2001. The licensee's September 29, 2000, application also requested a change to the power level at which the rod worth minimizer is required to be operable; however, that change was approved along with the ITS conversion and is not discussed in this safety evaluation (SE).

By letter dated March 1, 2001, the licensee requested additional TS changes to support the fuel transition. These additional changes were identified by the licensee when performing the analyses to support the extended power uprate (EPU) for DNPS (the EPU application was submitted on December 27, 2000). While the analyses did not specifically separate the effects of the fuel transition and change in methodology from those of the EPU, the licensee determined that it was appropriate to include the changes in the fuel transition. The specific changes were (1) increasing the number of required automatic depressurization system (ADS) valves from four to five, (2) adding a surveillance requirement (SR) for the Target Rock

safety/relief valve (SRV) to support crediting its ADS function, (3) revising the required action when the high pressure coolant injection (HPCI) system is inoperable and one low pressure emergency core cooling system (ECCS) injection/spray subsystem is inoperable, and (4) revising the low pressure coolant injection (LPCI) pump flow measurement surveillance. These additional changes requested by the licensee were noticed on August 22, 2001 (66 FR 44170).

By letter dated July 13, 2001, the licensee responded to the staff's request for additional information regarding the acceptability of crediting the ADS function of the Target Rock SRV.

By letter dated August 9, 2001, the licensee responded to the staff's request for additional information related to development of the GEXL14 critical power ratio (CPR) correlation used for GE-14 fuel.

By letter dated August 13, 2001, the licensee requested a change to the previously requested SR for the Target Rock SRV and also requested changes to ECCS setpoints to support the fuel transition. The licensee initially requested an SR to verify every 24 months that the leakage from the SRV accumulator is acceptable. At the staff's request, the licensee replaced this with a SR to verify every 31 days that the SRV accumulator pressure is acceptable. The ECCS setpoint changes resulted from a self-assessment of instrumentation setpoints. The licensee discovered that the time delays for the core spray (CS) and LPCI pumps had been incorrectly specified during the ITS conversion. The licensee requested changes to the CS and LPCI time delays to make them consistent with the safety analyses for the GE-14 fuel. These additional changes requested by the licensee were noticed on August 23, 2001 (66 FR 44382).

By letter dated October 17, 2001, the licensee provided revised TS pages to reflect the proposed changes.

## 2.0 EVALUATION

The licensee proposed the following changes to the DNPS TS:

### 2.1 TS 1.1, "Definitions"

The licensee proposed to add a definition, "Maximum Fraction of Limiting Power Density (MFLPD)," in TS 1.1 to support the transition to the use of GE-14 fuel. The MFLPD shall be the largest value of the fraction of limiting power density (FLPD) in the core. The FLPD shall be the linear heat generation rate (LHGR) existing at a given location divided by the specified LHGR limit for that bundle type. This definition is used in the GE methodology for monitoring GE fuel. Therefore, the staff finds that the addition of the definition is acceptable.

### 2.2 TS 3.1.4, "Control Rod Scram Times"

The licensee proposed to add new control rod scram times for GE analyzed cores in Table 3.1.4-1, "Control Rod Scram Times." The new scram times reflect the GE methodology of modeling control rod insertion during a scram. The staff reviewed the proposed changes and found them to be acceptable.

### 2.3 TS 3.2.4, "Average Power Range Monitor (APRM) Gain and Setpoint"

The licensee proposed: (1) to add, "and the ratio of MFLPD to Fraction of RTP (F RTP)," in limiting condition for operation (LCO) 3.2.4.a and SR 3.2.4.1; (2) to add, "the lesser of," and, "or F RTP/MFLPD," in LCO 3.2.4.b and SR 3.2.4.2.a; and (3) to replace, "Fraction of RTP (F RTP) times [Fuel Design Limiting Ratio for Centerline Melt] FDLRC," by, "higher of F RTP times FDLRC or of MFLPD," in LCO 3.2.4 and SR 3.2.4.2.b. The ratio of MFLPD/F RTP is added for monitoring GE fuel and the use of FDLRC is retained for modeling SPC fuel. The staff has reviewed the proposed changes and found them to be acceptable.

### 2.4 TS 3.3.5.1, "Emergency Core Cooling System (ECCS) Instrumentation"

The licensee proposed to change TS Table 3.3.5.1-1, "Emergency Core Cooling System Instrumentation," to revise the allowable value (AV) for Function 1.e, "Core Spray Pump Start-Time Delay Relay," from  $\leq 13.8$  seconds to  $\leq 11.0$  seconds, and the AV for Function 2.e, "Low Pressure Coolant Injection Pump Start-Time Delay Relay Pumps B and D," from  $\leq 8.8$  seconds to  $\leq 5.5$  seconds.

The purpose of the time delay in the pump start circuit is to stagger the starting of the CS and the LPCI pumps, thereby limiting the starting transients on the 4160-volt emergency buses when these buses are being supplied from the standby power source, the emergency diesel generator (EDG). For mitigating a loss-of-coolant-accident (LOCA) concurrent with loss of offsite power (LOOP), the safety analysis assumes a definite starting-time for each of the CS and LPCI pumps. This pump-start time is measured to begin following the occurrence of the LOCA/LOOP event, and is a combination of (1) the time the plant instrumentation and undervoltage relays take to detect and process LOCA and LOOP conditions and generate the required mitigation signals; (2) the time it takes to start the EDG, attain rated voltage and frequency, and close the EDG feeder breaker to the emergency bus; and (3) after the emergency bus is powered by the EDG (i.e., after the EDG feeder breaker is closed), the elapsed-time before each pump is given a start signal. The time delay relays in the pump-start circuit are initiated only after the emergency bus is powered from the EDG; therefore, time-delay setting for these relays is based on the item 3 time, adjusted for uncertainties in the associated instrumentation and devices.

During the ITS conversion, the setpoints and AVs for the start-time delay for the CS and LPCI pumps were erroneously specified longer than the correct values. This extended the starting time for these pumps, which is non-conservative considering the design function of these pumps is to mitigate LOCA/LOOP event in a timely manner. In its submittal the licensee stated that the proposed correct values will ensure that the assumed start times in the safety analyses for the CS pump and LPCI pumps B and D will be met. The licensee further stated that the setpoint and AV calculations were performed using the methodology in NES-EIC-20.04, "Analysis of Instrument Channel Setpoint Error and Instrument Loop Accuracy," and that this methodology has been reviewed and approved by the staff.

Based on the above evaluation, the staff concludes that the proposed TS changes for AVs, when implemented, will correct the error committed by the licensee during ITS implementation at DNPS, Units 2 and 3. Therefore, the proposed TS changes are acceptable.

## 2.5 TS 3.5.1, "ECCS - Operating"

The licensee proposed four changes, which are evaluated as follows:

- (1) Increase the number of ADS valves required to be operable from four to five.
- (2) Add a new SR 3.5.1.12 to verify at least once every 31 days that the pressure of the ADS pneumatic supply header is  $\geq 80$  psig.

The proposed change of fuel vendor and transition to GE-14 fuel, along with the EPU, have resulted in the need for additional ADS capacity. The licensee proposed to increase the number of required ADS valves from four to five by allowing credit for the use of the ADS function of the Target Rock SRV. The ADS at DNPS consists of four electromatic (electric power-actuated) relief valves (EMRVs) and one three-stage Target Rock SRV. The four EMRVs are currently credited with performing the ADS function. The Target Rock SRV receives an ADS actuation signal which actuates the valve with its air actuator, but is not currently credited for the ADS function.

The Target Rock SRV was previously not qualified for the ADS function because it did not satisfy the recommendation for qualification of the ADS accumulators in accordance with NUREG-0737, Item II.K.3.28. This item recommended that licensees verify that accumulators on ADS valves are provided with sufficient capacity to cycle the valves open five times at design pressure. Item II.K.3.28 also stated that air (or nitrogen) leakage through valves must be accounted for in order to assure that sufficient inventory of compressed air is available to open the ADS valves five times. Further, Item II.K.3.28 stated that the ADS valves, accumulators, and associated equipment and instrumentation are to be capable of performing their functions during and following exposure to hostile environments, taking no credit for non-safety related equipment or instrumentation.

To ensure the qualification of the Target Rock SRV, the licensee stated that the accumulator size was verified to be capable of allowing five cycles of operation without makeup. The licensee replaced the makeup supply check valves with soft seated spring-loaded ball check valves to minimize leakage. The licensee also stated that the accumulator leakage surveillance performed in accordance with the American Society of Mechanical Engineers Boiler and Pressure Vessel Code inservice testing (IST) requirements will continue to be a part of the IST program. Further, SR 3.5.1.12 is proposed to verify that the pneumatic supply pressure is at least 80 psig every 31 days. The licensee stated that the IST test of the accumulator leakage will verify that when supply pressure is 80 psig, the pressure will be at least 70 psig one hour after a loss of makeup supply. The licensee stated that, beginning with a pressure of 70 psig, the accumulator is sized such that the valve can open a minimum of five times with primary containment at atmospheric pressure. Ensuring the valve capability for five cycles is conservative since (1) during a small-break LOCA the valve may be required to open only once, and (2) subsequent maintenance of low pressure will be adequately ensured by the remaining four relief valves. One hour is adequate to depressurize the reactor following a small-break LOCA. This pressure is also sufficient for two cycles of valve operation with a primary containment pressure of 70 percent of design pressure, which the licensee determined is still adequate for the required depressurization capability.

The licensee stated that the piping and all associated components downstream of the isolation check valve are seismically supported, including the piping, the accumulator, and the Target Rock SRV. The licensee also stated that the SRV actuator and air solenoid valve are environmentally qualified, and that the SRV uses the same ADS function actuation instrumentation and logic circuitry as the four EMRVs that are already credited for ADS.

Further, the four EMRVs meet applicable seismic and environmental qualification requirements. Also, the electrical power for the ADS function of the Target Rock SRV is supplied by safety-related 125 volt DC power.

The licensee has provided information which adequately demonstrates the seismic and environmental qualification of the necessary components for ensuring the ADS function of the Target Rock SRV. Also, the proposed SR 3.5.1.12, together with the IST accumulator leakage test described above, provide adequate assurance that there will be sufficient accumulator pressure available for operating the SRV the necessary number of cycles for the limiting accident conditions. In addition, proposed SR 3.5.1.12 is consistent with the BWR/4 Standard Technical Specifications provided in NUREG-1433, Volume 1. This SR and the required IST for the SRV and its associated components provide reasonable assurance that the SRV will perform the ADS function, as required. Therefore, the staff finds crediting of the Target Rock SRV for the ADS function and the proposed TS changes to be acceptable.

- (3) Delete Action G, which addresses the Condition where the HPCI System is inoperable and either one low pressure ECCS injection/spray system is inoperable or one LPCI pump in each subsystem is inoperable, revise the action letter designations (editorial change), and add this Condition to new action I to specify that LCO 3.0.3 is entered in this condition.
- (4) Revise SR 3.5.1.5 to measure flow from 2 LPCI pumps instead of 3 LPCI pumps.

The licensee stated that these changes reflect the GE methodology and revised analyses for the fuel transition. With the introduction of GE-14 fuel, the LOCA analyses show that a failure of two ECCS subsystems such as HPCI and a low pressure ECCS injection/spray subsystem does not provide adequate core cooling to meet all of the required acceptance criteria. Consequently, the appropriate actions for this case would be an entry into LCO 3.0.3, which requires a reactor shutdown. In addition, the revised analyses consider that the most limiting single failure for the cases that involve the operation of LPCI is the failure of two LPCI pumps. For this case, the analyses assume that the two operating LPCI pumps provide 9000 gpm at 20 psig. Therefore, SR 3.5.1.5 is revised to reflect the analyses assumptions. The staff finds these changes to be acceptable.

## 2.6 TS 5.6.5, "Core Operating Limits Report (COLR)"

The licensee proposed to add two additional analytical methods to TS 5.6.5.b, GE Topical Report NEDE-24011-P-A, "General Electric Standard Application for Reactor Fuel (GESTAR)," and GE Topical Report NEDC-32981P, "GEXL96 Correlation for ATRIUM 9B Fuel," September 2000. Both of these topical reports have been approved by the NRC and are applicable for this fuel transition and vendor change.

As part of the review of the EPU for DNPS, the staff conducted an audit of the GESTAR analyses. As the result of the audit, by letter dated July 20, 2001, the staff requested additional information related to the development of the GEXL14 CPR correlation for GE-14 fuel and compliance with Amendment No. 22 to NEDE-20411-P-A. GE had augmented the CPR experimental data base with data generated by the COBRAG computer code. The staff determined that this did not comply with Amendment No. 22 to NEDE-20411-P-A. By letter dated August 9, 2001, the licensee provided additional information indicating that the GEXL14 correlation would be re-evaluated using test data alone in full compliance with Amendment No. 22 to NEDE-20411-P-A.

Based on the above, the staff finds that the proposed changes are acceptable.

### 3.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Illinois State official was notified of the proposed issuance of the amendments. The State official had no comments.

### 4.0 ENVIRONMENTAL CONSIDERATION

The amendments change a requirement with respect to the installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20. The NRC staff has determined that the amendments involve no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued proposed findings that the amendments involve no significant hazards consideration, and there have been no public comments on such findings (65 FR 81908, 66 FR 44170, and 66 FR 44382). Accordingly, the amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendments.

### 5.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendments will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributors: S. V. Athavale  
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Date: November 2, 2001