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AUTH.NAME AUTHOR AFFILIATION  
 BLISS,H.E. Commonwealth Edison Co.  
 RECIPIENT NAME RECIPIENT AFFILIATION  
 DAVIS,A.B. Region 3 (Post 820201)

SUBJECT: Requests that NRC revise previous interim restrictions to preclude regional instabilities to more closely reflect NRC & GE prescribed measures, per NRC Bulletin 88-007, Suppl 1.

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January 26, 1989

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Mr. A. Bert Davis  
Regional Administrator  
U.S. Nuclear Regulatory Commission  
Region III  
799 Roosevelt Road  
Glen Ellyn, IL 60137

**Subject: Commonwealth Edison BWR Operating  
Restrictions to Preclude Regional  
Instabilities**

References (a): Telecopy dated October 28, 1988 from  
D.P. Galle to A.B. Davis, providing  
information per 10 CFR 50.9 on the subject  
restrictions

(b): NRC Bulletin 88-07, Supplement 1 dated  
December 30, 1988

Dear Mr. Davis:

Reference (a) was provided following a conference call on October 28, 1988 to inform you per 10 CFR 50.9 of Commonwealth Edison (CECo) actions being taken as a result of early indications from General Electric that the BWROG-sponsored, generic stability analyses of regional oscillations suggested less MCPR margin than expected under some operating conditions. The operating restrictions discussed at that time were very conservative, interim measures which CECo believed appropriate given the unexpected but preliminary nature of the GE results.

Since that time:

- (a) GE has issued operating recommendations to all BWRs;
- (b) The BWROG and GE has fully briefed NRC Staff and ACRS at several meetings; and
- (c) The Reference (b) supplement to Bulletin 88-07 has been issued.

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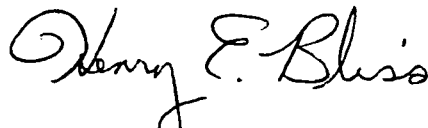
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CECo therefore believes that it is now appropriate to revise the previous interim restrictions to more closely reflect the GE and NRC prescribed measures. That is, the initial, self-imposed CECo conservatisms can now be removed for consistency with the Bulletin 88-07, Supplement 1 requirements. The attached discussion more specifically identifies the changes involved.

Since our interim actions were part of the 10 CFR 50.9 notification, this letter is intended to update you relative to these changes. A separate response to the Bulletin's supplement will also be submitted to NRR.

Please contact this office should further information be required.

Very truly yours,



H. E. Bliss  
Nuclear Licensing Manager

lm

Attachment

cc: T.E. Murley - Director, NRR  
B.L. Siegel - Project Manager, NRR  
P.C. Shemanski - Project Manager, NRR  
T.M. Ross - Project Manager, NRR  
Resident Inspectors Office - Dresden  
- Quad Cities  
- LaSalle

5500K

ATTACHMENT

REVISED BWR OPERATING RESTRICTIONS FOR  
REGIONAL INSTABILITIES

REFERENCE: D.P. Galle letter to R.L. Bax, et al, "General Electric Interim Operating Restrictions to Preclude Regional Instabilities", dated November 4, 1988.

The referenced letter directed all three BWR stations to implement operating restrictions to avoid and mitigate the consequences of potential regional core instabilities. This action demonstrated CECO's desire to provide prompt and meaningful operating recommendations in light of preliminary information received from General Electric in late October, 1988, concerning the severity of regional instabilities. Since that time, General Electric and the BWROG have formalized their operating recommendations and have discussed them at length with the Commission. The NRC has recently issued Bulletin 88-07, Supplement 1, which adopts the GE/BWROG recommendations with the exception, for LaSalle Station and similar plants, of requiring a manual scram in the event of any two recirculation pump trip while operating in the Run mode.

The current CECO operating limitations are more conservative than the Bulletin recommendations by:

- Limiting operating Flow Control Line (FCL) to 100% during normal operation (i.e., voluntarily avoiding operation in the "extended load line" region of the power-flow map).
- Requiring Dresden and Quad Cities to implement a manual scram whenever operation below 45% core flow and above the 100% FCL should occur. Note, for LaSalle, that this requirement is still enforced by the Bulletin when operating below 40% core flow and above the 100% FCL.

CECO now intends to remove these initial, self-imposed conservatisms for consistency with the GE and NRC prescribed measures. Although this will result in restrictions essentially the same as those of Bulletin 88-07 Supplement 1, the following points should be noted:

- (1) The Bulletin requires LaSalle to implement a manual scram in the event of a two pump trip while operating in the Run mode. Although not a requirement in the Reference recommendations, this action was initially enforced by the Confirmatory Action Letter (CAL) and CECO had decided to leave it in effect even after the CAL was closed.

- (2) To avoid any potential confusion, Regions B and C described in the Bulletin supplement shall be combined. The corrective action for Region B will be conservatively adopted for this aggregate region.
- (3) The Bulletin supplement states that intentional operation in Regions A or B shall not be allowed. However, CECO believes it may be in the interest of overall plant safety to enter these regions in the event of unforeseen problems that challenge vital equipment or fuel (e.g., tripping recirculation pumps in response to mechanical problems or reducing load with recirculation flow to mitigate preconditioning overpower). Once these regions are entered, the appropriate actions will be implemented as outlined in the Bulletin supplement. It should be noted that this interpretation of the restriction on "intentional operation" is also being generically pursued by the BWROG with NRR.