

Commonwealth Edison Company  
Quad Cities Generating Station  
22710 206th Avenue North  
Cordova, IL 61242-9740  
Tel 309-654-2241



January 10, 2000

SVP-00-014

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, D C 20555

Quad Cities Nuclear Power Station, Units 1 and 2  
Facility Operating License Nos. DPR-29 and DPR-30  
NRC Docket Nos. 50-254 and 50-265

Subject: Clarification to Technical Specification Change Request Technical Specifications Section 3/4.12.C "SPECIAL TEST EXCEPTIONS"

Reference: Letter from J.P. Dimmette, Jr. (ComEd) to USNRC dated November 12, 1999 (SVP 99-193) "Request for an Amendment to Technical Specifications Section 3 /4.6.K, "Primary System Boundary", Section 3 /4.12.C "Special Test Exceptions", and Request for Exemption from 10 CFR 50.60 "Acceptance criteria for fracture prevention measures for lightwater nuclear power reactors for normal operation"

In the Referenced letter, Commonwealth Edison (ComEd) Company proposed a change to the Technical Specifications (TS) Sections 3/4.6.K "PRIMARY SYSTEM BOUNDARY" and 3/4.12.C "SPECIAL TEST EXCEPTIONS", of Facility Operating Licenses DPR-29 and DPR-30. The proposed change revises the pressure-temperature limits by revising the heatup, cooldown and inservice test limitations for the Reactor Pressure Vessel (RPV) of each unit to a maximum of 32 Effective Full Power Years (EFPY). Furthermore, the proposed change deletes TS Section 3/4.12.C Special Test Exceptions, which provides for pressure testing at greater than 212° F in Mode 4.

Recently we identified that the deletion of the Special Test Exception which allowed suspension of the requirements of LCO 3/4.6.P "Residual Heat Removal – COLD SHUTDOWN" during performance of an inservice leak or hydrostatic test, affects the clarity of LCO 3/4.6.P.

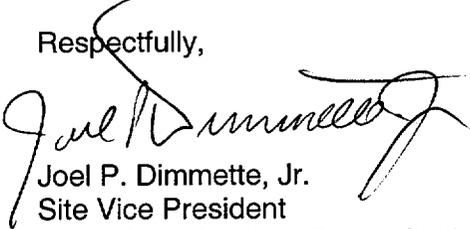
In order to retain the clarity of the existing specifications, we are proposing to supplement the Referenced submittal by modifying the footnotes of LCO 3/4.6.P to reflect the intent of LCO 3/4.12.C. The revised page changes are provided in the attachment.

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We have reviewed the proposed changes and have determined they are administrative in nature and do not affect the information supporting a finding of no significant hazards provided in the Referenced letter.

Should you have any questions concerning this letter, please contact Mr. C.C. Peterson at (309) 654-2241, extension 3609.

Respectfully,



Joel P. Dimmette, Jr.  
Site Vice President  
Quad Cities Nuclear Power Station

Attachments:

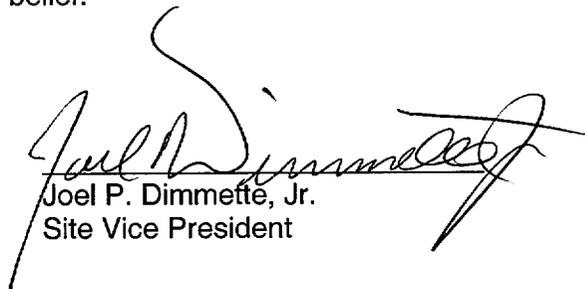
Affidavit  
Attachment A: Marked-up Page for Proposed Changes

cc: Regional Administrator – NRC Region III  
NRC Senior Resident Inspector – Quad Cities Nuclear Power Station

STATE OF ILLINOIS )  
COUNTY OF ROCK ISLAND )  
IN THE MATTER OF )  
COMMONWEALTH EDISON (COMED) COMPANY ) Docket  
Numbers )  
QUAD CITIES NUCLEAR POWER STATION UNITS 1 and 2 ) 50-254 and 50-265  
SUBJECT: Request for Technical Specification Changes Section 3 /4.6.K, "Primary  
System Boundary" and Section 3 /4.12.C "Special Test Exceptions"

**AFFIDAVIT**

I affirm that the content of this transmittal is true and correct to the best of my knowledge, information and belief.

  
Joel P. Dimmette, Jr.  
Site Vice President

Subscribed and sworn to before me, a Notary Public in and  
for the State above named, this 10 day of  
JANUARY, 192000.

  
Notary Public



Attachment A, Marked-up Page for Proposed Changes  
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Page 3/4.6-27

3.6 - LIMITING CONDITIONS FOR OPERATION

4.6 - SURVEILLANCE REQUIREMENTS

P. Residual Heat Removal - COLD SHUTDOWN

Two shutdown cooling mode subsystems of the residual heat removal (RHR) system shall be OPERABLE<sup>(a)</sup> and, unless at least one recirculation pump is in operation, at least one shutdown cooling mode subsystem shall be capable of circulating reactor coolant<sup>(b)</sup> with each subsystem consisting of at least:

1. One OPERABLE RHR pump, and
2. One OPERABLE RHR heat exchanger.

APPLICABILITY:

OPERATIONAL MODE 4.

ACTION:

1. With less than the above required RHR shutdown cooling mode subsystems OPERABLE, within 1 hour and at least once per 24 hours thereafter, demonstrate the operability of at least one alternate method capable of decay heat removal for each inoperable RHR shutdown cooling mode subsystem.

P. Residual Heat Removal - COLD SHUTDOWN

At least one shutdown cooling mode subsystem of the residual heat removal system, recirculation pump or alternate method shall be verified to be capable of circulating reactor coolant at least once per 12 hours.

*(S) is not required to be operable and*

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- a Each shutdown cooling subsystem is considered OPERABLE if it can be manually aligned (remote or local) in the shutdown cooling mode for removal of decay heat.
  - b The RHR shutdown cooling subsystem may be removed from operation during hydrostatic testing.

*171 & 167*