

September 12, 2000

Mr. Oliver D. Kingsley, President
Nuclear Generation Group
Commonwealth Edison Company
Executive Towers West III
1400 Opus Place, Suite 500
Downers Grove, IL 60515

SUBJECT: DRESDEN, LASALLE, QUAD CITIES - REQUEST FOR ADDITIONAL
INFORMATION (TAC NOS. MA8382, MA8383, MA8390, MA8388, MA8378
AND MA8379)

Dear Mr. Kingsley:

By letter dated March 3, 2000, the Commonwealth Edison Company (ComEd) submitted an application to convert Dresden Nuclear Power Station, Units 2 and 3; LaSalle County Station, Units 1 and 2; and Quad Cities Nuclear Power Station, Units 1 and 2, to the improved Standard Technical Specifications (iSTS). The staff requires additional information in order to complete its review of Sections 3.1, 3.2, and 3.9 of your application. Please respond to the enclosed request for additional information (RAI) and make any necessary revisions to the iSTS submittal within 60-days of receipt of this letter.

The staff forwarded you these questions as drafts on July 27, 2000, to allow discussion of the questions before the formal RAI was issued. The staff discussed the questions with you via teleconference on August 17, 2000, and the results of that discussion are incorporated into the questions.

If you have any questions about this letter or about the staff's review of your submittal, please contact me at (301) 415-1321.

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, 50-249, 50-373,
50-374, 50-254, 50-265

Enclosures: 1. Section 3.1 RAI
2. Section 3.2 RAI
3. Section 3.9 RAI

cc w/encls: See next page

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* See Previous Concurrence

OFFICIAL RECORD COPY

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Dresden, Units 2 and 3
LaSalle, Units 1 and 2
Quad Cities, Units 1 and 2

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O. Kingsley
Commonwealth Edison Company

- 2 -

Dresden, Units 2 and 3
LaSalle, Units 1 and 2
Quad Cities, Units 1 and 2

cc:

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**DRESDEN, QUAD CITIES, LASALLE
IMPROVED TECHNICAL SPECIFICATIONS
REQUEST FOR ADDITIONAL INFORMATION
SECTION 3.1 - REACTIVITY CONTROL SYSTEMS**

RAI 3.1.3-1

ITS 3.1.3 Control Rod Operability, for Dresden, Quad Cities, and LaSalle Plants
STS 3.1.3, Required Action E
JFD-4

STS 3.1.3 includes Required Action E which is for the Condition of “One or more groups with four or more inoperable control rods,” and is applicable to ANF/SPC (Siemens) fuel. The ITS for the COMED plants do not include this Condition or the associated Required Action, even though they utilize SPC fuel, because “... COMED performs cycle-specific CRDA analyses that incorporate eight rods out of service with at least two cell separation ... Consequently, this ACTION is not applicable ...”.

Comment: It is not clear why this Condition and associated Required Action are not applicable. Can the eight rod “limit” be any combination of control rods as long as the separation criteria are met? Should there be a different Condition E that expresses a different limit?

COMED Response:

RAI 3.1.3-2

ITS 3.1.3 Control Rod Operability, for Dresden, Quad Cities, and LaSalle Plants
ITS 3.1.3 Required Action D.1 and associated Bases
Dresden & Quad Cities DOC L.1(2) and JFD-2
LaSalle JFD-3

The ITS submittals change the STS 3.1.3 Required Action D.1 reference to “Banked Position Withdrawal Sequence (BPWS)” to “analyzed rod position sequence.” Dresden & Quad Cities DOC L.1(2) discussion includes a statement, “... position is in conformance with the analyzed rod position sequence (e.g., BPWS) constraints, ...”. In addition, Dresden & Quad Cities JFD-2 and LaSalle JFD-3 state that this change is made to “reflect plant specific ... licensing basis description.”

Comment: There is inadequate justification and Bases discussion regarding the use of the term “analyzed rod position sequence,” its relationship to BPWS, and how it is determined. Please provide the necessary justification and discussion.

COMED Response:

RAI 3.1.6-1

Not Used

RAI 3.1.6-2

ITS 3.1.6 Rod Pattern Control, for Dresden, Quad Cities, and LaSalle Plants

ITS 3.1.6 LCO, Conditions, and SR

JFD-1

The ITS submittals utilizes the term “analyzed rod position sequence” rather than “Banked Position Withdrawal Sequence (BPWS).” JD-3 states that this change is made to reflect “... proper plant specific information ...”.

Comment: There is inadequate justification and Bases discussion regarding the use of the term “analyzed rod position sequence,” its relationship to BPWS, and how it is determined. Please provide the necessary justification and discussion.

COMED Response:

**DRESDEN, QUAD CITIES, LASALLE
IMPROVED TECHNICAL SPECIFICATIONS
REQUEST FOR ADDITIONAL INFORMATION
SECTION 3.2 - POWER DISTRIBUTION LIMITS**

RAI 3.2.1-1

ITS 3.2.1 APLHGR, for Dresden

ITS 3.2.1 Bases

JFD-2

The last sentence of the B 3.2.1 Background section does not make sense (it is not a sentence); the words “are met” are missing after “10 CFR 50.46.”

Comment: Rewrite.

COMED Response:

RAI 3.2.1-2

ITS 3.2.1 APLHGR, for Dresden

ITS 3.2.1 Bases

JFD-1 and JFD-2

The Dresden Bases are different from the Quad Cities and LaSalle Bases in that the Dresden Bases do not address the use of GE fuel. Also, the Dresden Bases do not consider Anticipated Operational Occurrences (AOOs) while Quad Cities and LaSalle Bases do.

Comment: Why these differences; are they intentional?

COMED Response:

**DRESDEN, QUAD CITIES, LASALLE
IMPROVED TECHNICAL SPECIFICATIONS
REQUEST FOR ADDITIONAL INFORMATION
SECTION 3.9 - REFUELING OPERATIONS**

RAI 3.9.1-1

ITS 3.9.1 Refueling Equipment Interlocks, for Dresden, Quad Cities, and LaSalle
STS 3.9.1 Refueling Equipment Interlocks
ITS 3.9.1 LCO and Applicability
JFD-1

The ITS includes TSTF-232, which is not approved.

Comment: It is not expected that TSTF-232 will be approved and therefore should be removed from the ITS.

COMED Response:

RAI 3.9.1-2

ITS 3.9.1 Refueling Equipment Interlocks, for Dresden, Quad Cities, and LaSalle
ITS 3.9.1 Required Actions A.2.1 & A.2.2
TSTF-225

The ITS has adopted TSTF-225.

Comment: TSTF-225, as adopted in the ITS, was mistakenly approved and therefore should be removed from the ITS. A revised plant specific version of TSTF-225, requiring ALL rods be inserted, has been approved for the Perry plant. A similar change would be acceptable for the Dresden, Quad Cities, and LaSalle plants.

COMED Response:

RAI 3.9.9-1

ITS 3.9.9 RHR/SDC-Low Water Level, for Dresden, Quad Cities, and LaSalle
STS 3.9.9 RHR/SDC-Low Water Level
ITS 3.9.9 Condition A
JFD-3

The ITS 3.9.9 adds a note to allow separate condition entry, and rewords Required Action A.1 for verifying an alternate method of decay heat removal for "each" inoperable RHR/SDC subsystem, to verifying an alternate method of decay heat removal for "the" inoperable RHR/SDC subsystem.

Comment: Request COMED submit a TSTF change request to add the note on separate condition entry.

COMED Response:
