November 3, 2000

Mr. Oliver D. Kingsley, President
Nuclear Generation Group
Commonwealth Edison Company
Executive Towers West III
1400 Opus Place, Suite 500
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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, 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 3.8 and 5.0 of your application. Please respond to the enclosed request for additional information (RAI) within 30 days of receipt of this letter and make any necessary revisions in your next revision to the iSTS submittal.

The NRC discussed these questions with your staff on October 10, 11, 12 and 26, 2000. 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 3.8 RAI for Dresden
2. Section 3.8 RAI for Quad Cities
3. Section 3.8 RAI for LaSalle
4. Section 5.0 RAI for all stations

cc w/encls: See next page

O. Kingsley
Commonwealth Edison Company

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

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November 3, 2000

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Dear Mr. Kingsley:

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The NRC discussed these questions with your staff on October 10, 11, 12 and 26, 2000. 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

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Enclosures:
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4. Section 5.0 RAI for all stations

cc w/encls: See next page

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ACCESSION NO.: ML003767237

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DATE	11/1/00	11/1/00	10/30/00	11/2/00

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3.8.1, AC Sources - Operating

3.8.1-1 DOC A.2; Bases JFD 1
CTS 3.9.A.2.b and CTS 3.9.A.4
ITS SR 3.8.1.4 and ITS SR 3.8.1.7

CTS 3.9.A.2.b verifies the bulk fuel storage volume available and CTS 3.9.A.4 checks for and assures removal of accumulated water. ITS SR 3.8.1.4 and ITS SR 3.8.1.7 retain these respective CTS requirements.

Comment - In order to implement this change, the Bases ITS 3.8.1 LCO discussion must be revised to state "Stored diesel fuel oil is required to have sufficient supply for two days of full operation to ensure DG Operability."

3.8.1-2	Not used.
3.8.1-3	Not used.

3.8.1-4 DOC M.1 and JFD 3
No CTS requirement
ITS 3.8.1 Applicability Note

A Note is proposed to be added to the LCO which states that the opposite unit's AC electrical power sources are not required to be OPERABLE when the associated equipment is inoperable.

Comments: The provision to not require the opposite units's AC electrical power sources to be OPERABLE when the associated supported equipment is inoperable appears to be acceptable on the surface. However, in actual plant operation, the opposite unit's AC electrical power sources could be inoperable for up to 7 days, at which time the associated supported equipment could be declared inoperable, and the Actions of LCO 3.8.1 exited. The effect of this is to extend the AOT for the opposite unit's AC electrical power sources beyond 7 days, for which an adequate justification has not been provided. The licensee should review this issue with a view towards providing an adequate justification, or deleting the proposal. The licensee is also requested to discuss the relationship between inoperable equipment supported by the opposite unit's AC electrical power sources and ITS LCO 3.8.1 Required Action B.2, Condition F, and Condition G.

ComED Response:

3.8.1-5 No CTS Requirement
DOC M.1 and JFD 3
ITS 3.8.1 Actions Note

The CTS requirements have been modified by the addition of proposed ITS 3.8.1 Actions Note which states "LCO 3.0.4 is not applicable for the opposite unit's AC electrical power sources."

Comments: JFD 3 states that the non-applicability of LCO 3.0.4 is consistent with the CTS. The licensee is requested to provide a specific reference to where this can be found in the CTS. Absent this, the licensee is requested to provide a specific justification for this exception to LCO 3.0.4.

ComEd Response:

3.8.1-6	**Not used.**
3.8.1-7	**Not used.**

3.8.1-8 CTS 4.9.A.8.f.2
ITS 3.8.1.19
DOC LA.3 JFD 2

CTS 4.9.A.8.f.2, which requires energizing the auto connected emergency loads through the "load sequencer" has not been retained in the ITS.

It is understood that Dresden does not have a "load sequencer", as such. However, the plant design does include individual sequence timers. The licensee is requested to discuss these individual sequence timers in terms of how their failure affects the offsite power sources and the DGs. Specifically, the staff is concerned with the failure of a sequencer in a manner that will cause separate loads to be started with too little time between the starts, and what the impact of this failure would be on the AC electrical power sources. The staff is also concerned with how such possible failures can be addressed in Technical Specifications.

ComEd Response:

3.8.2, AC Sources - Shutdown	
3.8.2-1	Not used.
3.8.2-2	Not used.

3.8.2-3 DOC M.1 and Bases JFD 8
CTS 3.9.B.1 and Action 1
ITS 3.8.2 Required Action A.1

The CTS requirements have been modified by the addition of proposed ITS 3.8.2 Required Action A.1 which provides an option to declare all required features inoperable.

Comment 1 - The first paragraph of DOC M.1 is acceptable for revising the Operability requirements of CTS 3.9.B.1. It is acceptable to add ITS 3.8.2 Required Action A.1 which follows the guidance of the STS; however, the technical justification is inconsistent with the CTS change category as presented in the second paragraph of DOC M.1. The discussion implies the most conservative action is to follow the new option of ITS 3.8.2 Required Action A.1; whereas, it is most direct and involves less administrative effort to simply suspend Core Alterations, irradiated fuel handling and OPDRVs. Continuing plant operations in a degraded mode under potentially multiple LCO Required Actions is not conservative and is "less restrictive".

ComED Response:

3.8.3, Diesel Fuel Oil, Lube Oil and Starting Air

3.8.3-1 **Not used.**

3.8.3-2 **Not used.**

3.8.3-3 **DOC L.3 and No JFD**
CTS 4.9.A.10
STS SR 3.8.3.6

TSTF-02 call for relocating this requirement. A relocation is something that goes to a licensee controlled document which is controlled by 50.59 or other acceptable means. Absent some control of the document to which the requirement is relocated, it becomes a deletion. A deletion will have to be justified.

ComEd Response:

3.8.4, DC Sources - Operating

3.8.4-1 **DOC LA.1**
CTS 3.9.C.1 and 2
ITS 3.8.4 LCO Operability

CTS 3.9.C.1 and 2 state the Operability requirements for the 250 VDC and 125 VDC station batteries and chargers. The Operability requirements for the 250 VDC and 125 VDC batteries have been moved to the Bases for ITS 3.8.4.

DOC LA.1 is acceptable to define Operability requirements in ITS 3.8.4; however, the Bases description appears incomplete. The ITS Bases information provided needs more explanation, and the revised Bases should answer the following:

The description of the 125 VDC subsystem could be improved to make it more clear how the subsystems are configured. Specifically, it should be made clear that the normal configuration is that a subsystem in a unit provides power to Division 1 in that unit and to Division 2 in the opposite unit. Also, each subsystem has two battery chargers, and that each unit has an alternate 125 VDC subsystem that can be substituted under specific conditions. The relationship between the unit battery chargers and the alternate battery should also be explained.

ComEd Response:

3.8.4-2 Not used.

3.8.4-3 **DOC LA.2**
CTS 4.9.C and Footnote (a)
Bases ITS 3.8.4

CTS 4.9.C and Footnote (a) for the alternate 125 volt battery, state surveillance requirements shall be adhered to in order for the battery to be considered Operable. This Operability requirement is moved to the ITS 3.8.4 Bases.

Comment - DOC LA.2 is acceptable to define Operability requirements in ITS 3.8.4 Bases; however, the Bases discussion of LCO does not contain any Operability requirements for the alternate 125 volt battery subsystem as stated by DOC LA.2. Revise the Bases description to ensure the following is explained:

1) - How can these alternate battery and charger be used when (as quoted from Bases Insert BKGD-1) they are susceptible to single failure and therefore are not reliable as normal or continuous 125 VDC sources?
2) - The Bases and Actions imply two alternate battery subsystems are to be maintained Operable. As stated in SR 3.8.4.1.c, why is only the Unit 2 alternate battery used to be Operable and not Unit 3?
3) - The alternate 125 VDC battery subsystem per CTS 3.9.C Action 2 must be Operable including a full capacity charger; so when and under what SR is the alternate 125 VDC charger verified Operable?
4) - When are the balance of the SR 3.8.4.2 through SR 3.8.4.9 performed for the alternate 125 volt battery subsystem?

ComED Response:

3.8.5, DC Sources - Shutdown

3.8.5-1 Not used.

3.8.5-2 **DOC M.1**
CTS 3.8.2.4
ITS 3.8.5 Required Action A.1

The CTS requirements have been modified by the addition of proposed ITS 3.8.5 Required Action A.1 which provides an option to declare all required features inoperable.

Comment 1 - The first paragraph of DOC M.1 is acceptable for revising the Operability requirements of CTS 3.8.2.4 It is acceptable to add ITS 3.8.5 Required Action A.1 which follows the guidance of the STS; however, the technical justification is inconsistent with the CTS change category as presented in the second paragraph of DOC M.1. The discussion implies the most conservative action is to follow the new option of ITS 3.8.5 Required Action A.1; whereas, it is most direct and involves less administrative effort to simply suspend Core Alterations, irradiated fuel handling and OPDRVs. Continuing plant operations in a degraded mode under potentially multiple LCO Required Actions is not conservative and is "less restrictive". Provide more a detailed explanation or a less-restrictive technical justification to permit this option to be added to the current licensing basis.

ComED Response:

3.8.6, Battery Cell Parameters

3.8.6-1 **JFD 2 and Bases JFD 5**
CTS 3.9.C
ITS 3.8.6 LCO, Action A and B

Suggest adding “for a limited time” to the Note ahead of “following”, i.e., “during and , for a limited time, following.....” In the Bases, explain what this is for and indicate the time necessary for the electrolyte stabilization is usually about 3 days. This will put some kind of a cap on the time, but with proper wording, 3 days plus some additional time would still be acceptable.

3.8.7, Distribution System - Operating

3.8.7-1 **DOC A.2 and DOC LA.1; and JFD 2**
CTS 3.9.E.1.c
ITS 3.8.7 LCO item b

CTS 3.9.E.1.c requires "The Unit 120 volt Essential Service Bus and Instrumentation Bus" power distribution system to be energized. ITS 3.8.7 LCO item b states the electrical power distribution subsystem for the essential service and instrument 120 VAC buses shall be Operable.

Comment: Explain in detail why two separate Actions B and C are required for these buses? Provide the responses as requested above for the identified issues and revise the ITS Bases 3.8.7 Background and LCO discussion.

ComED Response:

3.8.7-2 Not used.

3.8.7-3 **DOC M.2 and Bases JFD 2**
CTS 3.9.E Action 1 and 2
ITS 3.8.7 Action G

CTS 3.9.E Action 1 allows 8 hours to restore one inoperable AC subsystem, Action 2 allows 2 hours to restore one inoperable DC subsystem, and two inoperable subsystems require entry into CTS 3.0.C. ITS 3.8.7 Action G requires entry into LCO 3.0.3 if two or more electrical power subsystems result in a loss of function.

Comment: Explain why ITS Action G is entered if "two or more" electrical power subsystems result in a loss of function when DOC M.2 states entry is required when "one or more" electrical power subsystems result in a loss of function. Also, Bases JFD 2 is inadequate because it does not explain the text addition to ITS 3.8.7 Bases discussion of Action G. This text states that the level of degradation that causes a required safety function to be lost apparently does not apply because "single division systems are not included". What does this mean and why is it being added?

ComED Response:

3.8.8, Distribution System - Shutdown

3.8.8-1 DOC M.1
CTS 3.9.F.1 Action
ITS 3.8.8 LCO, Condition A and Required Action A.1

(1) The CTS requirements have been modified by the addition of proposed ITS 3.8.8 Required Action A.1 which provides an option to declare all required features inoperable. (2) In addition, CTS 3.9.F Actions have been modified to be "one or more required" instead of the current "less than".

Comment 1 - The first CTS change is acceptable to add ITS 3.8.8 Required Action A.1 which follows the guidance of the STS; however, the technical justification is inconsistent with the CTS change category, as presented in the second paragraph of DOC M.1. The discussion implies the most conservative action is to follow the new option of ITS 3.8.2 Required Action A.1; whereas, it is most direct and involves less administrative effort to simply suspend Core Alterations, irradiated fuel movement and OPDRVs. Continuing plant operations in a degraded mode under potentially multiple LCO Required Actions is not conservative and is "less restrictive". Comment 2 - The second CTS change as noted above is acceptable because it implements the guidance of the STS; however, there is no technical justification for this CTS change provided in DOC M.1 It also appears that this CTS change may be "less-restrictive". Provide the correct change categories for these CTS changes. Provide a more detailed explanation or technical justification to permit these options to be added to the current licensing basis. The licensee should revise the DOCs, JFDs, CTS markup, ITS markup, and ITS Bases of the submittal to adopt the STS.

ComEd Response:

Request of Additional Information
Quad Cities - Units 1 & 2 Application of Conversion to
NUREG-1433, Standard Technical Specifications
General Electric Plants (BWR/4)

3.8.1, AC Sources Operating

3.8.1-01 No CTS requirement
DOC M.1 and JFD3
ITS 3.8.1 Applicability Note

A Note is proposed to be added to the LCO which states that the opposite units AC electrical power Sources are not required to be OPERABLE when the associated equipment is inoperable.

Comments: The provision to not require the opposite unit's AC electrical power sources to be OPERABLE when the associated supported equipment is inoperable appears to be acceptable on the surface. However, in actual plant operation, the opposite unit's AC electrical power sources could be inoperable for up to 7 days, at which time the associated supported equipment could be declared inoperable, and the associated Actions of LCO 3.8.1 exited. The effect of this is to extend the AOT for the opposite unit's AC electrical power sources beyond 7 days, for which an adequate justification has not been provided. The licensee should review this issue with a view towards providing an adequate justification, or deleting the proposal. The licensee is also requested to discuss the relationship between inoperable equipment supported by the opposite unit's AC electrical power sources and ITS LCO 3.8.1 Required Action B.2, Condition F, and Condition G.

ComEd Response:

3.8.1-02 No CTS Requirement
DOC M.1 and JFD 3
ITS 3.8.1 Actions Note

The CTS requirements have been modified by the addition of proposed ITS 3.8.1 Actions Note which states "LCO 3.0.4 is not applicable for the opposite unit's AC electrical power sources."

Comments: JFD 3 states that the non-applicability of LCO 3.0.4 is consistent with the CTS. The licensee is requested to provide a specific reference to where this can be found in the CTS. Absent this, the licensee is requested to provide a specific justification for this exception to LCO 3.0.4.

ComEd Response:

3.8.1-03 CTS 4.9.8.F.2, ITS 3.8.1.19
DOC LA.3 JFD 2

It is understood that Quad Cities does not have sequencers, as such. However, the plant design does include individual sequence timers. The licensee is requested to discuss these

individual sequence timers in terms of how their failure affects the offsite power sources and the DGs. Specifically, the staff is concerned with the failure of a sequencer in a manner that will cause separate loads to be started with too little time between the starts, and what the impact of this failure would be on the AC electrical power sources. The staff is also concerned with how such possible failures can be addressed in Technical Specifications.

ComEd Response:

3.8.1-04 ITS SR 3.8.1.9
No JFD

It is the staff's understanding that transfer from the UAT to the RAT is automatic, and that transfer to the other unit RAT is manual. The "automatic" portion of the NUREG SR has been deleted, and no justification has been provided for this change. Since the Quad Cities design includes an automatic transfer feature, the staff is of the opinion that this feature should be tested as part of this SR. The licensee is requested to revise the submittal to include testing the automatic transfer feature, or provide a detailed justification as to why it is not required.

ComEd Response:

3.8.1-05 Not used.

3.8.1-06 Not used.

3.8.1-07 ITS SR 3.8.1.15
JFD 12

Proposed Note 2 is acceptable. However, in the body of the SR, and in Note 1, the numerical value for power factor has been deleted and the term "limit" substituted. The numerical value associated with the "limit" is included in the Bases. In doing this, the Bases tend to become part of the TS because they are stating a value as opposed to explaining why a specific value is included in TS. It would appear that including the power factor value in the SR and allowing Note 2 to control its use would be more appropriate. The licensee is requested to consider the staff's comment.

ComEd Response:

3.8.1-08 Not used.

3.8.1-09 Bases Pg. B3.8.1-1
Fourth paragraph

This discussion could be expanded to note that Bus 23-1 is part of the offsite circuit to Bus 13-1, Bus 24-1 is part of the offsite circuit to Bus 14-1, and vice versa. Expand the Bases so it is clear that a problem on the ESS bus in one unit does not require entry into the distribution LCO for the other unit.

ComEd Response:

3.8.1-10 Not used.

3.8.1-11 Bases Pg. B3.8.-4
Insert LCO -2

The insert and the final version of the Bases do not appear to agree. Specifically, credit for the UATS in back feed mode appears to be inconsistent.

ComEd Response:

3.8.1-12	Not used.
3.8.1-13	Not used.
3.8.1-14	Bases Pg. 3.8-13, 14 Action E1

As written, the Bases discussion of two DGs inoperable can mean the unit DG and the common DG, or either the unit DG or the common DG and the opposite unit's DG. In the case of the former, the remaining DG (opposite unit) is of little value, and the two hour Completion Time is justified. However, in the case of the opposite unit's DG and the associated unit or common DG inoperable, the consequences of the loss of the opposite unit's DG are minimal. Note, however, that the systems powered by this DG are required to respond to analyzed events- see insert on pg. B3.8-1. Consequently, one unit DG or the common DG and the opposite unit DG is a two hour Action. T his does not seem to be adequate. Does this Bases need to be revised to be less restrictive? Does Condition E in the LCO need to be revised? It is the staff's view that some revision is necessary.

ComEd Response: See Comment 3.8.1-1

3.8.1-15	Bases Pg. 3.8-15 Action G

In this Condition, the loss of the opposite unit's DG could be included. As stated above, this appears to be too restrictive. Consideration should be given to revisiting these Bases and the Corresponding TS.

ComEd Response: See Comment 3.8.1-14

3.8.1-16	Bases Pg. B3.8-19 SR 3.8.1.5 and SR 3.8.1.7 JFD 1

The proposed additional material does not totally have the proper emphasis. Removal of free water from the day tanks and bulk storage tanks is the purpose of these SRs. There is no requirement in the Fuel Oil Program to test the fuel oil in the bulk storage tanks for water content. This is only performed on new fuel. Some Bases revision appears to be in order.

ComEd Response:

3.8.1-17	Not used.
3.8.1-18	Not used.
3.8.1-19	Bases Pg. B3.8.28 Insert SR 3.8.1-15

The insert discussion addresses a condition where voltage may be acceptable, but the excitation level could potentially give rise to unacceptable transient voltages if the DG breaker were to open.

Comment: What is the most limiting restriction with regard to power factor? Is it bus voltage? Or is it transient voltage caused by a DG breaker opening? Should the Bases discussion only address one issue since it appears to bound the others; i.e., excitation associated with transient voltages is the primary concern.

ComEd Response:

3.8.2, AC Sources - Shutdown

3.8.2-01 Not used.

3.8.2-02 Not used.

3.8.2-03 Not used.

3.8.2-04 Bases Pg. B3.8-38 Action A.1
JFD 8

The licensee is requested to explain what is meant by the proposed addition to the Bases which states, in part "remaining powered from a qualified offsite circuit, even if that circuit is considered inoperable...." Specifically, how can an offsite circuit that is considered inoperable be credited with powering required features under this LCO. Include examples for addition to the Bases as part of the response to this comment.

ComEd Response:

3.8.3, Diesel Fuel, Lube Oil and Starting Air

3.8.3-01 Not used.

3.8.3-02 CTS 4.9.A.10
DOC L.3

This requirement was removed from the NUREG on the basis that the requirement at individual plants would be relocated to a licensee controlled document to which changes are controlled under 10 CFR 50.59. The Quad Cities proposal to move this CTS requirement to plant procedures does not appear to be acceptable.

ComEd Response:

3.8.3-03 Not used.

3.8.3-04 Bases Pg. B3.8-41

The last paragraph on the page appears to have some incorrect language. It appears that it should read "Each DG has two air starting systems, each of which includes a pair of air receivers with adequate capacity—etc." The licensee should consider making the change. Also, is it this design that is the basis for adding "required" to Condition C as addressed in RAI 3.8.3-03. With respect to the Quad Cities design, are the air starting systems completely independent; i.e., there is no piping that interconnects the systems?

ComEd Response:

3.8.4, DC Source - Operating

3.8.4-01 Not used.

3.8.4-02 Not used.

3.8.4-03 ITS SR 3.8.4.8

The SR requires that the 125 VDC batteries have a capacity greater than 80% of manufacturer's rating, but the requirement for the 250 VDC batteries is stated a "minimum acceptable battery capacity." What is the minimum acceptable battery capacity for the 250 VDC batteries? Where is it stated? Why is it not included in the TS? How will the licensee comply with the second and third frequencies for this SR which are based on % of manufacturer's rating?

ComEd Response:

3.8.4-04 Not used.

3.8.4-05 Bases Pg. B3.8-51 Background

In the last paragraph of the Background section, the term "within 24 hours" is deleted. No justification is provided. What is the reason for the deletion? What is the capability of the battery chargers at Quad Cities?

ComEd Response:

3.8.4-06 Bases Pg. B3.8-52 LCO

The description of the 125 VDC subsystem could be improved to make it more clear how the subsystems are configured. Specifically, it should be made clear that the normal configuration is that a subsystem in a unit provides power to Division 1 in that unit and to Division 2 in the opposite unit. Also, each subsystem has two battery chargers, and that each unit has an alternate 125 VDC subsystem that can be substituted under specific conditions. The relationship between the unit battery chargers and the alternate battery should also be explained.

ComEd Response:

3.8.4-07 Not used.

3.8.4-08 Not used.

3.8.4-09 Not used.

3.8.4-10 Not used.

3.8.4-11 See Dresden RAI 3.8.4-3

3.8.5, DC Sources - Shutdown

No comments on this section

3.8.6, Battery Cell Parameters

3.8.6-01 Table 3.8.6-1 Footnote a
JFD 5

Some time limit needs to be applied to “and following” in this footnote. As worded, the electrolyte level could be above maximum for an indefinite period of time following an equalizing charge.

ComEd Response:

3.8.7, Distribution System - Operating

3.8.7-01 Bases Pg. B3.8-81 LCO
JFD 2

The NUREG Bases is worded such that all redundant electrical power distribution subsystems that are connected by cross ties are considered inoperable. The reason for this is that, when cross tied, independence is lost and a single event could render all the redundant systems inoperable. The licensee has proposed to revise the Bases such that only redundant subsystems that are not powered from their normal source are considered inoperable. JFD 2 does not explain why cross tied subsystems in the Quad Cities design would be any different than the design reflected in the NUREG. The licensee is requested to provide a more adequate justification for the proposed change, or retain the NUREG language.

ComEd Response:

3.8.7-02 Bases Pg. B3.8-88 Insert B3.8-88

Footnote (a) to the proposed Table states that the 250 VDC buses constitute a single subsystem. The staff interprets this to mean that if any part of the 250 VDC distribution subsystem in either unit is inoperable, both units are in an Action. If this is not correct, consideration should be given to modifying the footnote, Table, or both to clearly state under what conditions each unit is in what Action. For example, MCC1 is part of the distribution subsystem for Unit 1, but is part of the DC source to MCC 2 B in Unit 2. Therefore, if MCC1 was inoperable, Unit 1would be in a distribution Action, and Unit 2 would be in a source Action. If MCC 1A was inoperable, it would appear that only Unit 1 was in a distribution Action, but the Bases wording indicates that both Units would be in an Action. Review is needed.

ComEd Response:

3.8.8, Distribution System - Shutdown

3.8.8-01 See Dresden RAI 3.8.8-01

Request for Additional Information
LaSalle Units 1 & 2 Application for Conversion to
NUREG - 1434, Standard Technical Specifications
General Electric Plants (BWR/6)

3.8.1, AC Sources - Operating

3.8.1-1 Not used.

3.8.1-2 Not used.

3.8.1-3 DOC LA.6; JFD 2
CTS 4.8.1.1.2.d.6.a.2
STS 3.8.1 LCO item c and STS 3.8.1 Action F, STS SR 3.8.1.11.c.2

CTS 4.8.1.1.2.d.6.a.2 requires energizing the auto-connected emergency loads through the "load sequencer". STS LCO 3.8.1 Item c and STS 3.8.1 Action F and SR 3.8.1.11.c.2 have not been adopted in the ITS.

Comment: -No Bases discussion of “sequencers” has been provided, and DOC LA.6 does not provide an adequate justification for the deletion of CTS 4.8.1.1.2.6.a.2. The licensee should provide an adequate justification for the change or retain the CTS as well as associated portions of the NUREG dealing with sequencers.

ComEd Response:

3.8.1-4 Not used.

ComEd Identified BSI -
Distribution Spec. 7d AOT applied to AC Sources-Operating **-**

3.8.1-5 DOC L.18 and JFD 20
CTS 3.8.1.1 Action a and CTS 3.8.2.1 Action c
ITS 3.8.1 Required Action A.3, Completion Time

The CTS 3.8.1.1 Action a allows 72 hours to restore an inoperable offsite AC source and CTS 3.8.2.1 Action c allows 7 days to restore the one of two required other unit buses with associated cross tie breakers. DOC L.18 concludes that ITS 3.8.1 Required Action A.3, Completion Time should be changed to 7 days for qualified circuits because the 7 day AOT for busses and breakers that make up a portion of the qualified circuits are equally important to the safe operation of both circuits.

Comment: This issue is assigned to TSB for review. The proposed CTS changes extending inoperable offsite source allowed outage times to 7 days from 72 hours are unacceptable for inclusion in the ITS conversion review. AOT changes such as this beyond scope item discussed in DOC L.18 often require submitting a detailed risk analysis to show that no adverse impact on public health and safety would result if the qualified circuit AOT is extended. Retain

CTS Action a 72 hour completion time for ITS 3.8.1 Required Action A.3. Revise discussions of change as necessary.

ComEd Response:

3.8.1-6	Not used.

ComEd Identified BSI -
Distribution. TS 7d AOT applied to AC - Operating related to L18

3.8.1-7 DOC L.1 and JFD 5
CTS 3.8.1.1 Action a, b, c, d, e, and footnote (*)
ITS 3.8.1 Required Action A.3, B.4 and C.4, Second Completion Time

CTS 3.8.1.1 Action a, b, c, d, e, and footnote (*) require the inoperable offsite circuit or the inoperable DG restored to operable status within 72 hours (or from the time of initial loss). ITS 3.8.1 Required Action A.3, B.4 and C.4 allow the CTS requirement to be extended to 10 days from entry into the LCO.

Comment - This issue is assigned to TSB for review. DOC L.1 is not acceptable for extending to 10 days from 6 days the STS allowance for the exception to the normal STS "time zero" clock for beginning the completion time clock. Additionally, JFD 5 is only an abbreviated description of the deviation and further it appears the justification is based upon DG inoperabilities of 7 days in CTS Action 3.8.1.b that do not exist. There is no specific or acceptable technical justification for changing STS or adopting STS Completion Time extensions proposed. Revise the DOCs, JFDs, and ITS to adopt the STS second Completion Times for Required Actions A.3, B.4, C.4.

ComEd Response:

3.8.1-8	Not used.
3.8.1-9	Not used.
3.8.1-10	Not used.
3.8.1-11	Not used.
3.8.1-12	Not used.

ComEd Identified BSI - Refueling Interval DG starts & offsite power transfers SR not limited to "during shutdown" per CTS and STS.

3.8.1-13 DOC L.6; JFD 12, Bases JFD 5, and JFD 11
CTS 4.8.1.1.1.b and CTS 4.8.1.1.2.d
ITS SR 3.8.1.8 thru ITS SR 3.8.1.19

From the above mentioned ITS SRs, the corresponding STS SR Note requirements were not adopted which state that "The Surveillances shall not be performed in MODES 1, 2 or 3", (as applicable).

Comment - DOC L.6 and JFD 12 are not acceptable for making generic changes to STS and changing the current LaSalle licensing basis. TSB is assigned this issue for review and acceptance. TSB does not accept TSTF-283, Rev. 3 exceptions. Delete this proposed generic change and provide the STS Notes to SRs 3.8.1.8 thru 3.8.1.19.

ComEd Response:

3.8.1-14	Not used.
3.8.1-15	Not used.
3.8.1-16	Not used.
3.8.1-17	Not used.
3.8.1-18	Not used.

3.8.1-19 JFD 2
CTS 4.8.1.1.2.d.5
ITS SR 3.8.1.12

CTS 4.8.1.1.2.d.5 verifies the separate starting of the Division 1, 2, and 3 DGs on a simulated ECCS test signal. ITS SR 3.8.1.12 retains this CTS requirement but does not adopt ITS SR 3.8.1.12 items d and e.

Comment: JFD 2 addresses deviations that are [ ] requirements in the STS. JFD2 is inadequate for a technical justification for this deviation from the STS, therefore additional discussion is needed to understand the safety basis for the proposed STS deviation. ITS SR 3.8.1.12 items d and e are not bracketed requirements.

ComEd Response:

3.8.2, AC Sources - Shutdown

No comments on Section 3.8.2

3.8.3, Diesel Fuel Oil, Lube Oil and Starting Air

3.8.3-1 JFD 4 and JFD 6
CTS 3.8.1.1.b.1.b, CTS 3.8.1.1.b.2, CTS 3.8.1.2.b.1.b and CTS 3.8.1.2.b.2
ITS 3.8.3 Action A and ITS SR 3.8.3.1

CTS 3.8.1.1.b.1.b, CTS 3.8.1.1.b.2, CTS 3.8.1.2.b.1.b and CTS 3.8.1.2.b.2 require a specified minimum fuel storage capacity to be available for each DG. ITS 3.8.3 Action A provides new Actions when these storage limits are not met and ITS SR 3.8.3.1 specifies the minimum storage capacities to be periodically verified for each DG in one location within the STS.

Comment - The configuration and the operation of the fuel oil storage tanks are not explained. Consequently, the plant specific capacity from the CTS can not be verified to match the values specified in the ITS. Example - Unit 1 CTS requires DG 1B to have 29,750 gallons and Unit 2 CTS requires DG 2B to have 29,750 gallons which implies there should be 59,500 gallons minimum capacity for the Division 3 DGs. Also explain if the Division 1 and 2 DGs have separate fuel oil storage tanks or do all three DGs have one common storage tanks? Provide a

technical explanation which is suitable for inclusion into the Bases to explain the La Salle fuel oil storage tank configuration, design and operation that supports the required fuel capacity specified in ITS SR 3.8.3.1.

ComEd Response:

3.8.3-2 Not used.

3.8.3-3 Not used.

3.8.3-4 No DOC and JFD 2
CTS 4.8.1.1.2.a.7
ITS 3.8.3 Action D; ITS SR 3.8.3.3

CTS 4.8.1.1.2.a.7 verifies the pressure in the "required" DG air start receivers; whereas, the ITS 3.8.3 Action D refers to one or more DGs with the "required" starting air pressure as not being with limits.

Comment - JFD 2 has inadequately justified plant specific terminology changes. There needs to be consistency in the terminology used when converting from the current licensing basis and consistency within the LCO. There should be no difference between maintaining the starting air subsystem within limits and for providing Required Actions should any one of the starting air receiver pressure tanks be outside of the limits. ITS SR 3.8.3.3 should verify the pressure in each of the two pairs of air receivers for each DG. There is no LCO provision to maintain less than the full complement of components that constitute the starting air subsystem for each DG. Delete the word "required" inserted into Action C and ITS SR 3.8.3.2. Adopt the STS or provide detailed description and associated ITS Bases explanation revision to explain why this word is necessary.

ComEd Response:

3.8.3-5 Not used.

3.8.3-6 JFD 7
STS SR 3.8.3.5

CTS 4.8.1.1.2.c.1.a requires that stored and new fuel be sampled and analyzed at least once per 92 days to determine the water content is within the applicable ASTM limit. The CTS do not require testing for accumulated water and therefore STS SR 3.8.3.5 is not adopted.

Comment: JFD 7 justification for deleting the test for accumulated water in storage tanks should be reconsidered because fouling problems persist with new diesel fuel oil refining methods. Additionally, to meet the stated objective by ComEd to maintain TS consistent between LaSalle, Dresden and Quad Cities the staff notes that STS SR 3.8.3.5 is adopted in the Dresden and Quad Cities ITS.

ComEd Response:

3.8.4, DC Sources - Operating

3.8.4-1 Not used.

3.8.4-2 L.1, JFD 4 and Bases JFD 8
CTS 4.8.3.2.d
ITS SR 3.8.4.6 thru ITS SR 3.8.4.8
New Beyond Scope Issue

From the above mentioned ITS SRs, the corresponding NUREG SR Note requirements were not adopted which state that "The Surveillances shall not be performed in MODES 1, 2 or 3. However, credit may be taken for unplanned events that satisfy this SR"

Comment - JFD 4 is used to deleted the allowance giving credit for unplanned events in performing the ITS SRs. This is acceptable and consistent with TSTF-8. However, the proposed change to delete the restriction on Mode performance of the SR, i.e., “The Surveillance shall not be performed in MODES 1,2 or 3.” does not adopt TSTF-8 is does not retain CTS SR 4.8.3.2.d requirements.

TSB was assigned this issue for review. TSB does not find it acceptable delete the restriction on Mode performance of the SR approved by TSTF-8. Include these limitations to the SR Notes.

ComEd Response:

3.8.5, DC Sources - Shutdown

3.8.5-1 No DOC and JFD 4, M.4
CTS 3.8.2.4 Action c
ITS 3.8.5 Action A
ComEd Identified BSI

CTS 3.8.2.4 Action c permits a division battery and charger to be inoperable for 72 hours and operation to continue if the unit tie breakers for the affected division are operable and aligned to supply power from the other unit. ITS 3.8.5 extends the 72 hour repair AOT to two inoperable or even three inoperable divisions of 125 VDC if the DC divisions are cross-tied via the unit tie breakers and the unit is not in Modes 1, 2 or 3.

Comment: TSB is assigned this issue for review. There are two elements to this change. The addition of the ITS note make the TS more restrictive overall since the allowance to cross-tie the DC subsystems is limited to conditions for both units in shutdown. The TS become less restrictive with the change because the note applies to more than one DC subsystem, thus two or all DC subsystems may be cross-tied if both plants are in shutdown. Provide a revised M-DOC to include a safety basis discussion for the less restrictive element of the proposed change.

ComEd Response:

3.8.5-2 No DOC
CTS 3.8.2.4 Action a, b, c, and d
ITS 3.8.5 Action B

CTS 3.8.2.4 Action a, b, c, and d define compensatory measures when the respective Divisions of the 125 VDC subsystems are inoperable. These various Action requirements are consolidated into Action B of ITS 3.8.5.

Comment - CTS Action d: Unit 2, Division 2 inoperable. CTS Action d requires the standby gas treatment system subsystem B and the control room and auxiliary electric equipment room emergency filtration system train B to be declared inoperable and to take the appropriate system TS (3.6.5.3 and 3.7.2) actions to be followed with the Unit 2 Division 2 electrical power supply inoperable. DOC A.4 states that ITS Condition B are equivalent to the actions in CTS 3.6.5.3 and 3.7.2. CTS 3.7.2 actions are only equivalent if both trains of control room filtration equipment are inoperable. Evaluate the need to correct DOC A.4.

ComEd Response:

3.8.5-3 DOC M.1
CTS 3.8.2.4 Action a
ITS 3.8.5 Required Action A.1

The CTS requirements have been modified by the addition of proposed ITS 3.8.5 Required Action A.1 which provides an option to declare all required features inoperable.

Comment - The first paragraph of DOC M.1 is acceptable for revising the Operability requirements of CTS 3.8.2.4. It is acceptable to add ITS 3.8.5 Required Action A.1 which follows the guidance of the STS; however, the technical justification is inconsistent with the CTS change category as presented in the second paragraph of DOC M.1. The discussion implies the most conservative action is to follow the new option of ITS 3.8.5 Required Action A.1; whereas, it is most direct and involves less administrative effort to simply suspend Core Alterations, irradiated fuel handling and OPDRVs. Continuing plant operations in a degraded mode under potentially multiple LCO Required Actions is not conservative and is "less restrictive". Provide more a detailed explanation or a less-restrictive technical justification to permit this option to be added to the current licensing basis.

ComED Response:

3.8.6, Battery Cell Parameters

3.8.6-1 JFD 5, M.2
CTS 3/4.8.2.3
ITS 3.8.6 LCO, Table 3.8.6-1

Comment: Suggest adding “for a limited time” to the Note ahead of “following”, i.e., “during and, for a limited time, following.....” In the Bases, explain what this is for and indicate the time necessary for the electrolyte stabilization is usually about 3 days. This will put some kind of a cap on the time, but with proper wording, 3 days plus some additional time would still be acceptable.

ComEd Response:

3.8.7, Distribution System - Operating

3.8.7-1 Not used.

3.8.7-2 DOC L.1, M.2; Bases JFD 2
CTS 3.8.2.1 Action a and CTS 3.8.2.3 Action a
ITS 3.8.7 Actions A, B, and G

CTS 3.8.2.1 Action a allows 8 hours to restore one inoperable AC electrical power distribution subsystem and CTS 3.8.2.3 Action a allows 2 hours to restore one inoperable DC electrical power distribution subsystem, and two inoperable electrical power distribution subsystems require entry into CTS 3.0.C. ITS 3.8.7 Action G requires entry into LCO 3.0.3 if two or more electrical power distribution subsystems result in a loss of function.

Comment - Explain why ITS Action G is entered if "two or more" electrical power subsystems result in a loss of function when DOC M.2 states entry is required when "one or more" electrical power subsystems result in a loss of function. Also, Bases JFD 2 is inadequate because it does not explain the text addition to ITS 3.8.7 Bases discussion of Action G. This text states that the level of degradation that causes a required safety function to be lost apparently does not apply because "single division systems are not included". What does this mean and why is it being added?

ComEd Response:

3.8.7-3 DOC L.2
CTS 3.8.2.1 Action d
ITS 3.8.7 Action C, and ITS 3.8.1 Action A

CTS 3.8.2.1 Action d allows 8 hours to restore the other unit Division 1 and 2 AC and DC electrical power distribution subsystems to operable status. ITS 3.8.1 Action A and ITS 3.8.7 Action C retain this CTS requirement.

Comment: DOC L.2 is acceptable; however, the text provided in DOC L.2 contains references to several Action Completion Times (72 hours when ITS proposes a change to 7 days) that have not been resolved yet.

ComEd Response: No response is necessary. This is a placeholder until resolution is reached.

3.8.8, Distribution System - Shutdown

No comments on this section

Section 5.0 RAIs
Dresden, Quad Cities and LaSalle ITS

5.0-1 STS 5.1.2, Responsibility
ITS 5.1.2
CTS 6.1.B
JFD 3

LaSalle CTS 6.1.c.1 requires the Shift Manager to designate at least one Senior Reactor Operator to assume the control room direction responsibility. STS 5.1.2 requires the [Shift Supervisor (SS)], (a bracketed position), to be responsible for the control room command function. In two instances, the individual responsible for the control room command function is identified by title in STS 5.1.2. NUREG-1433, requires titles for members of the facility staff filling certain positions. Titles are bracketed to allow the facility to customize the title to their facility. The ComEd markup of STS 5.1.2 for Dresden, Quad Cities and LaSalle replaces a title with a qualification (i.e., Senior Reactor Operator).

For Dresden, Quad Cities and LaSalle, provide a revised ITS section 5.1.2 to include the title of the individual who will have responsibility for the control room command function.

ComEd Response:

5.0-2 TS 5.2.2 Unit Staff

JFD 8 states that changes to TSTF-258, Rev. 4, are not incorporated in ITS 5.2.2 in order to be consistent with the NRC approved ITS for ComEd Byron and Braidwood stations. Provide the plant specific information that could result in not incorporating changes of TSTF-258.

ComEd Response:

5.0-3 TS 5.5.11 Technical Specifications (TS) Bases Control Program

The Commission's Final Rule dated October 4, 1999, on Revision of 10 CFR 50.59 affects this TS. The Commission is removing "unreviewed safety question" in order to avoid confusion between a determination of safety and a determination of the need for NRC approval. This TS should be modified in 5.5.11.b.2 as:

2. A change to the updated UFSAR or Bases that requires NRC approval pursuant to 10 CFR 50.59.

ComEd Response:

5.0-4 ITS 5.5.7.2, Ventilation Filter Testing Program
DOC A.11

The word "significant" was added to ITS 5.5.7.2. However, the word "significant" was not in the STS or the CTS. In DOC A.11, a reference to an NRC letter to Entergy Operations dated September 11, 1997, supported this clarification. Provide more details.

ComEd Response:

5.0-5 ITS 5.5.7.c.3, Ventilation Filter Testing Program
CTS 4.7.p.3

CTS 4.7.p.3 contains the statement “a methyl iodide penetration of <2.5%”, however, in insert ITS 5.5.7.c, the sign of inequalities are missing in front of 2.5% and 0.5%. Provide correction.

ComEd Response:

5.0-6 ITS 5.5.9.c, Diesel Fuel Oil Testing Program
CTS 4.9.6.b

STS list ASTM standard D2276, but ITS 5.5.9.c lists no ASTM standard for particulate testing. Provide the appropriate standard citation for ASTM 5254.

ComEd Response:

5.0-7 TS 5.6.4 Monthly Operating Reports

JFD for TS 5.6.4, not incorporating the TSTF-258 Rev. 4 change, is to be consistent with the NRC approved ITS for the ComEd Byron and Braidwood Stations. Provide more detailed plant specific explanations.

ComEd Response:

5.0-8 TS 5.6.5 Core Operating Limits Report (COLR)

This TS is under the technical staff review. Resolution is pending. The final resolution of this TS may be different from the proposed ITS 5.6.5.

ComEd Response:

5.0-9 No DOC and Bases JFD 1, 2, 3, 6, and 7
CTS 3/4.8.1.1 and CTS 3/4.8.1.2
Bases for ITS SR 3.8.3.2 and Reference #6

There are multiple changes identified in the ITS Bases which describe the diesel fuel test program that is contained in ITS Section 5.0. Also, the ASTM code citations and revisions require verification with respect to the applicable sections of the UFSAR and Reg Guide commitments.

Comment: ITS Bases for SR 3.8.3.2 list all applicable ASTM Standards for diesel fuel oil testing in reference 6 (page B 3.8.3-8). Each Standard in reference 6 is contained in ASTM D975 except D5452-98. Because the ITS Diesel Fuel Oil Test Program in specification 5.5.10 proposes a generic reference to “applicable ASTM Standards” to be used to conduct TS required testing, the staff requires adding a citation to ASTM D5452 to ITS 5.5.10, “Diesel Fuel Oil Testing.”

ComEd Response:
