

RS-00-149**November 20, 2000****U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555-0001****Dresden Nuclear Power Station, Units 2 and 3
Facility Operating License Nos. DPR-19 and DPR-25
NRC Docket Nos. 50-237 and 50-249****LaSalle County Station, Units 1 and 2
Facility Operating License Nos. NPF-11 and NPF-18
NRC Docket Nos. 50-373 and 50-374****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: Response to Request for Additional Information**

- References:** (1) Letter from R. M. Krich (ComEd) to U. S. NRC Document Control Desk, "Request for Technical Specifications Changes for 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 Convert to Improved Standard Technical Specifications," dated March 3, 2000.
- (2) Letter from S. N. Bailey (U. S. NRC) to O. D. Kingsley, "Dresden, LaSalle, Quad Cities - Request for Additional Information," dated November 3, 2000.

Commonwealth Edison (ComEd) Company in a letter dated March 3, 2000, Reference 1, proposed changes to the Technical Specifications (TS) of Facility Operating License Nos. DPR-19, DPR-25, NPF-11, NPF-18, DPR-29, and DPR-30 for 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. The NRC subsequently issued a Request for Additional Information (RAI) letter

A001

November 20, 2000
U. S. Nuclear Regulatory Commission
Page 2

in Reference 2. The RAI letter requested that additional information be provided concerning Section 3.8, "Electrical Power Systems," and Section 5.0, "Administrative Controls," of Reference 1 within 30 days after receipt of the letter (i.e., by December 06, 2000). The RAI letter also requested that any necessary revisions to the Reference 1 submittal be made within 60 days after the receipt of the letter. The requested additional information is provided in the Attachment to this letter. The necessary changes to the Reference 1 submittal will be made after resolution of the issues in the RAI letter is achieved.

Should you have any questions concerning this letter, please contact Mr. J. V. Sipek at (630) 663-3741.

Respectfully,



R. M. Krich
Vice President - Regulatory Services

Attachment: Response to Request for Additional Information

cc: Regional Administrator - NRC Region III
NRC Senior Resident Inspector - Dresden Nuclear Power Station
NRC Senior Resident Inspector - LaSalle County Station
NRC Senior Resident Inspector - Quad Cities Nuclear Power Station
Office of Nuclear Facility Safety - Illinois Department of Nuclear Safety

ATTACHMENT

Response to Request for Additional Information

**Request for Additional Information
Dresden Station Units 2 & 3 Application for Conversion to
NUREG - 1433, Standard Technical Specifications
General Electric Plants (BWR/4)**

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."

ComEd Response: ISTS 3.8.1 provides the requirements for the DG fuel oil day tank and fuel oil transfer requirements. However, these requirements are not discussed in the LCO section of the ISTS Bases. Therefore, adding just the fuel oil storage requirements to the LCO section of the ITS Bases does not seem appropriate. However, the LCO section of the Bases will be revised to state "In addition, fuel oil storage and fuel oil transfer pump requirements must be met for each required DG."

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' 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: The CTS does not provide any requirements for the opposite unit's Division 2 AC power sources (offsite circuit or DG). In addition, the CTS definition of

Request for Additional Information
Dresden Station Units 2 & 3 Application for Conversion to
NUREG - 1433, Standard Technical Specifications
General Electric Plants (BWR/4)

OPERABILITY only requires one AC power source, either the offsite circuit or the DG. Therefore, the CTS allows the opposite unit's Division 2 offsite circuit or DG to be inoperable for an unlimited amount of time. As described in DOC M.1, Dresden has added a requirement that both opposite unit Division 2 AC sources be Operable to support the required opposite unit-powered equipment. Therefore, this additional requirement is more restrictive than is currently required, and DOC M.1 provides the proper justification.

If the opposite unit Division 2 DG is inoperable, then ACTION B is entered, which requires the DG to be restored within 7 days. If the DG is not restored within 7 days, then, as allowed by the Note, the associated equipment can be declared inoperable and the opposite unit sources are no longer required Operable by LCO 3.8.1. Thus ITS 3.8.1 ACTION B is exited. In addition, once the associated equipment is declared inoperable, the applicable ACTIONS for the associated equipment is taken. For example, when the Note is used, the associated SGT subsystem would be declared inoperable, and its ACTIONS allow 7 days to restore the inoperable SGT subsystem before a shutdown is required.

Additionally, while still in ITS 3.8.1 ACTION B (i.e., during the first 7 days), the "cross-train check" required by ITS 3.8.1 Required Action B.2 will only be failed if the redundant Division 1 feature (e.g., SGT subsystem) is concurrently inoperable. In this condition, if the opposite unit DG or Division 1 SGT subsystem is not restored to Operable status within the 4 hour restoration time, then ACTION F is entered and the unit is shutdown. Alternately, if the Applicability Note is used and the associated equipment is declared inoperable (e.g., the opposite unit-powered SGT subsystem), then the ACTIONS in ITS 3.6.4.3 for two inoperable SGT subsystems must be taken. The applicable ITS 3.6.4.3 ACTION in this case will also require a unit shutdown, consistent with ITS 3.8.1 ACTION F. ITS 3.8.1 ACTION G will normally be used when three unit AC sources are inoperable. For example, if the opposite unit DG is inoperable concurrent with an inoperable offsite source and unit DG, the Applicability Note would be used to declare the associated equipment inoperable. This would preclude the plant from entering ACTION G, since there are now only two required AC sources inoperable. However, while the ITS 3.8.1 ACTION D allows up to 12 hours to restore one of the two required AC sources, with the opposite unit-powered SGT subsystem declared inoperable, if the inoperable unit DG is the Division 1 DG, then ITS 3.8.1 Required Action B.2 (the cross-train check action) would require restoration within 4 hours, as previously described above.

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: The CTS does not provide any requirements for the opposite unit's

Request for Additional Information
Dresden Station Units 2 & 3 Application for Conversion to
NUREG - 1433, Standard Technical Specifications
General Electric Plants (BWR/4)

Division 2 AC power sources (offsite circuit or DG). In addition, the CTS definition of OPERABILITY only requires one AC power source, either the offsite circuit or the DG. Therefore, the CTS allows the opposite unit's Division 2 offsite circuit or DG to be inoperable for an unlimited amount of time. As such, the unit is allowed to change MODES with an opposite unit's AC power source inoperable. In addition, JFD 3 does provide justification for this allowance other than the justification that it is consistent with the CTS. Specifically, JFD 3 states that this allowance is acceptable due to the low probability of an event requiring the opposite unit equipment.

The ITS ACTIONS Note would allow a unit startup to commence with one opposite unit Division 2 AC power source inoperable. For example, the allowance could be needed if the opposite unit was in a shutdown, and maintenance was being performed on the opposite unit Division 2 DG. If the given unit was in MODE 1 and a unit trip occurred, the ITS ACTIONS Note would allow the given unit to restart with the opposite unit Division 2 DG still inoperable. Without the Note, ITS 3.0.4 would preclude the startup, since entry into MODE 2 from MODE 3 would be prohibited by ITS 3.0.4 with the opposite unit DG inoperable.

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: The Dresden 2 and 3 design does not include "load sequencers" as described in the Improved Standard Technical Specifications (ISTS), but includes time delay relays for individual components (e.g., Low Pressure Coolant Injection (LPCI) pumps). The term "load sequencer" as used in Current Technical Specifications (CTS) 4.9.A.8.f.2 is taken to mean the time delay relays installed for the associated components. This term, "time delay relay," will be added into ITS SR 3.8.1.19.c.2 using an "A" Discussion of Change (DOC) to describe the change from "load sequencers" to "time delay relays" and the "LA" DOC (LA.3) will be deleted.

3.8.2, AC Sources - Shutdown

3.8.2-1	Not used.
3.8.2-2	Not used.

**Request for Additional Information
Dresden Station Units 2 & 3 Application for Conversion to
NUREG - 1433, Standard Technical Specifications
General Electric Plants (BWR/4)**

- 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: A new L DOC will be provided to justify the change.

3.8.3, Diesel Fuel Oil, Lube Oil and Starting Air

- 3.8.3-1** Not used.
3.8.3-2 Not used.
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- 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 some 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: Per a phone conversation with the NRC subsequent to the receipt of this Request for Additional Information, the NRC requested that ComEd change the DOC from an L DOC to an LA DOC and relocate the requirement to a 50.59 controlled document. ComEd will submit a new LA DOC for this change.

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

**Request for Additional Information
Dresden Station Units 2 & 3 Application for Conversion to
NUREG - 1433, Standard Technical Specifications
General Electric Plants (BWR/4)**

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: The Bases will be clarified.

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: The alternate 125 VDC subsystem consists of a 125 VDC battery that can be manually placed in service during inoperabilities of the normal 125 VDC battery. Even

Request for Additional Information
Dresden Station Units 2 & 3 Application for Conversion to
NUREG - 1433, Standard Technical Specifications
General Electric Plants (BWR/4)

though there is a battery charger associated with the alternate battery, it can only be used to maintain a float charge on the alternate battery; it is not a full capacity battery charger. Only the alternate battery in conjunction with one of the 125 VDC subsystem (full capacity) battery chargers (normal or spare charger) can be used to meet the requirements of Action 3.9.C.2.

The alternate 125 VDC batteries cannot be used to meet the requirements of the LCO. However, they can be used for a short time when the associated normal 125 VDC battery is inoperable, as stated in the CTS 3.9.C Actions and ITS 3.8.4 Required Actions D.1, E.1, and F.2. The Bases statement in the Background section will be revised to more clearly state the requirements and allowances.

As stated above, the alternate 125 VDC batteries cannot be used to meet the LCO requirements, thus they are not required to be continuously maintained Operable. However, when allowed by the ITS 3.8.4 Required Actions, one alternate 125 VDC battery can substitute for the normal 125 VDC battery. Under this condition, the alternate 125 VDC battery is required to be Operable.

ITS SR 3.8.4.1.c only provides a special voltage limit for the Unit 2 alternate 125 VDC battery due to the battery requiring a higher voltage than the other 125 VDC batteries. The Unit 3 alternate 125 VDC battery voltage limit is the same as the normal 125 VDC battery and is covered by ITS SR 3.8.4.1.b.

Even though there is a battery charger associated with the alternate battery, it is only used to maintain a float charge when the alternate battery is not connected to the DC bus. In order to meet the requirements of Required Actions D.1, E.1, and F.2, the alternate battery and one of the 125 VDC (normal or spare) battery chargers would be required to be placed in service. The battery chargers that would be placed in service are the chargers that are normally used to provide power to the DC bus and are tested in accordance with ITS SRs.

For the alternate 125 VDC subsystem to be Operable, all the applicable SRs of ITS 3.8.4 must be met; ITS SRs 3.8.4.1 through 3.8.4.9. Since the battery chargers are tested as part of the normal 125 VDC subsystem, the Bases statements in ACTIONS D.1 and D.2, and E.1 and E.2 that describe the Operability requirement for the alternate battery subsystem will be revised to remove any reference to a charger in regards to the alternate subsystem Surveillance Requirements. However, it was noted that this similar statement is not in the Bases for ACTIONS F.1 and F.2 (Required Action F.2 also allows the Operable alternate 125 VDC battery to be placed in service). It was also noted that the Bases for ACTIONS F.1 and F.2 did not describe the allowance to place an Operable alternate 125 VDC battery in service. These two oversights will be corrected. In addition, it was noted that SR 3.8.4.1.c is only applicable when the alternate battery is being used to meet the LCO. Therefore, a Note will be added to ITS 3.8.4.1.c stating that SR 3.8.4.1.c is only required to be met when the Unit 2 alternate battery is required to be Operable. Additionally, the Bases of ITS 3.8.4 will be revised to clearly define the alternate 125 VDC subsystem.

3.8.5, DC Sources - Shutdown

**Request for Additional Information
Dresden Station Units 2 & 3 Application for Conversion to
NUREG - 1433, Standard Technical Specifications
General Electric Plants (BWR/4)**

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: A new L DOC will be provided to justify the change.

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.

ComEd Response: The above requested change will be made.

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"

**Request for Additional Information
Dresden Station Units 2 & 3 Application for Conversion to
NUREG - 1433, Standard Technical Specifications
General Electric Plants (BWR/4)**

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: Separate ACTIONS were provided for these buses to be consistent with the format of the ISTS (the ISTS had a separate ACTION for a 120 V AC vital bus). However, upon further review, these two separate ACTIONS do not appear necessary and they can be covered by ITS 3.8.7 ACTION A. The appropriate changes will be made.

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: DOC M.2 should have stated entry is required when "two or more" electrical power subsystems result in a loss of function. This will be corrected. The first sentence in the ISTS ACTIONS F.1 Bases (ITS ACTIONS G.1 Bases), which states that the Condition corresponds to a level of degradation in the electrical distribution system that causes a required safety function to be lost was modified by the parenthetical phrase "single division systems are not included." This was added since the Dresden 2 and 3 design includes some systems that have only one subsystem (e.g., Control Room Emergency Ventilation System), such that the loss of one electrical division results in the loss of the safety function. Therefore, to ensure correctness in the statement for the purpose of ITS Condition G, this parenthetical phrase was added. In addition, as discussed with the NRC reviewer during meetings concerning Section 3.8, an allowance to exempt single division systems that result in a loss of function will be added to ITS Condition G and the Bases will be modified accordingly.

3.8.8, Distribution System - Shutdown

Request for Additional Information
Dresden Station Units 2 & 3 Application for Conversion to
NUREG - 1433, Standard Technical Specifications
General Electric Plants (BWR/4)

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. Revise the DOCs, JFDs, CTS markup, ITS markup, and ITS Bases of submittal to adopt the STS.

ComEd Response: Comment 1: A new L DOC will be provided to justify the change.
Comment 2: The words "less than the" above required AC or DC distribution systems energized is synonymous with the words "one or more" AC or DC distribution subsystems inoperable. The words "less than" can mean one, two, or any number; therefore, it is not a "less restrictive" change. The change in terminology was made to be consistent with the ISTS, and it was mentioned in the last sentence of the M.1 DOC.

Request for Additional Information
Quad Cities Units 1 & 2 Application for 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: The Current Technical Specifications (CTS) do not provide any requirements for the opposite unit's Division 2 AC power sources (offsite circuit or diesel generator (DG)). In addition, the CTS definition of OPERABILITY only requires one AC power source, either the offsite circuit or the DG. Therefore, the CTS allows the opposite unit's Division 2 offsite circuit or DG to be inoperable for an unlimited amount of time. As described in Discussion of Change (DOC) M.1, Quad Cities has added a requirement that both opposite unit Division 2 AC sources be Operable to support the required opposite unit-powered equipment. Therefore, this additional requirement is more restrictive than is currently required, and DOC M.1 provides the proper justification.

If the opposite unit Division 2 DG is inoperable, then ACTION B is entered, which requires the DG to be restored within 7 days. If the DG is not restored within 7 days, then, as allowed by the Note, the associated equipment can be declared inoperable and the opposite unit sources are no longer required Operable by LCO 3.8.1. Thus Improved Technical Specification (ITS) 3.8.1 ACTION B is exited. In addition, once the associated equipment is declared inoperable, the applicable ACTIONS for the associated equipment is taken. For example, when the Note is used, the associated standby gas treatment (SGT) subsystem would be declared inoperable, and its ACTIONS allow 7 days to restore the inoperable SGT subsystem before a shutdown is required.

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

Additionally, while still in ITS 3.8.1 ACTION B (i.e., during the first 7 days), the "cross-train check" required by ITS 3.8.1 Required Action B.2 will only be failed if the redundant Division 1 feature (e.g., SGT subsystem) is concurrently inoperable. In this condition, if the opposite unit DG or Division 1 SGT subsystem is not restored to Operable status within the 4 hour restoration time, then ACTION F is entered and the unit is shutdown. Alternately, if the Applicability Note is used and the associated equipment is declared inoperable (e.g., the opposite unit-powered SGT subsystem), then the ACTIONS in ITS 3.6.4.3 for two inoperable SGT subsystems must be taken. The applicable ITS 3.6.4.3 ACTION in this case will also require a unit shutdown, consistent with ITS 3.8.1 ACTION F. ITS 3.8.1 ACTION G will normally be used when three unit AC sources are inoperable. For example, if the opposite unit DG is inoperable concurrent with an inoperable offsite source and unit DG, the Applicability Note would be used to declare the associated equipment inoperable. This would preclude the plant from entering ACTION G, since there are now only two required AC sources inoperable. However, while the ITS 3.8.1 ACTION D allows up to 12 hours to restore one of the two required AC sources, with the opposite unit-powered SGT subsystem declared inoperable, if the inoperable unit DG is the Division 1 DG, then ITS 3.8.1 Required Action B.2 (the cross-train check action) would require restoration within 4 hours, as previously described above.

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: The CTS does not provide any requirements for the opposite unit's Division 2 AC power sources (offsite circuit or DG). In addition, the CTS definition of OPERABILITY only requires one AC power source, either the offsite circuit or the DG. Therefore, the CTS allows the opposite unit's Division 2 offsite circuit or DG to be inoperable for an unlimited amount of time. As such, the unit is allowed to change MODES with an opposite unit's AC power source inoperable. In addition, Justification for Deviation (JFD) 3 does provide justification for this allowance other than the justification that it is consistent with the CTS. Specifically, JFD 3 states that this allowance is acceptable due to the low probability of an event requiring the opposite unit equipment.

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

The ITS ACTIONS Note would allow a unit startup to commence with one opposite unit Division 2 AC power source inoperable. For example, the allowance could be needed if the opposite unit was in a shutdown, and maintenance was being performed on the opposite unit Division 2 DG. If the given unit was in MODE 1 and a unit trip occurred, the ITS ACTIONS Note would allow the given unit to restart with the opposite unit Division 2 DG still inoperable. Without the Note, ITS 3.0.4 would preclude the startup, since entry into MODE 2 from MODE 3 would be prohibited by ITS 3.0.4 with the opposite unit DG inoperable.

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: The Quad Cities 1 and 2 design does not include "load sequencers" as described in the Improved Standard Technical Specifications (ISTS), but includes time delay relays for individual components (e.g., Low Pressure Coolant Injection (LPCI) pumps). The term "load sequencer" as used in Current Technical Specifications (CTS) 4.9.A.8.f.2 is taken to mean the time delay relays installed for the associated components. This term, "time delay relay," will be added into ITS SR 3.8.1.19.c.2 using an "A" DOC to describe the change from "load sequencers" to "time delay relays" and the "LA" DOC (LA.3) will be deleted.

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: While the normal source of power to one of the 4160 V essential service system (ESS) buses during power operations is through the unit auxiliary transformer (UAT), it is not one of the two required sources. The two required offsite sources are through the unit's reserve auxiliary transformer (RAT) and the opposite unit's RAT (or the opposite unit's UAT

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

when the opposite unit is shutdown and the UAT is in the backfeed mode). While the automatic transfer from the unit's UAT to the RAT is required for Operability of the unit's RAT (as described in the LCO section of the Bases, which states that the fast transfer capability must exist), CTS 4.9.A.1.b does not require the fast transfer feature to be tested as part of a Technical Specification Surveillance. Only the manual transfer from the unit's RAT to the opposite unit's RAT is required to be tested by Technical Specifications. In addition, Improved Standard Technical Specifications (ISTS) SR 3.8.1.8 also does not require a fast transfer from a non-qualified source to be verified; it only requires testing of the transfer capability from the normal offsite circuit to the alternate offsite circuit (i.e., transfer from one of the two qualified circuits to the other qualified circuit). Therefore, testing of the fast transfer capability from a non-qualified source to a qualified offsite circuit will not be added to the ITS.

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: ComEd notes that the actual power factor limit is currently under licensee control, in that it is not in the CTS. In addition, there are numerous instances where the "limits" are specified in the ITS Bases, and the actual ITS only requires the "limits" to be met (e.g., ITS SR 3.8.3.3). Therefore, ComEd will maintain the power factor limits in the ITS Bases.

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: The LCO section of the Bases will be modified to more clearly discuss this issue.

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

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: The typed version of the ITS is incorrect and will be modified to match the ISTS markup version.

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. This 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 3.8.1-01

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

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

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: The last sentence of the top insert on ISTS markup page B 3.8-19 is incorrect and will be deleted.

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: The primary concern is the transient voltage caused by a DG breaker opening. The Bases discussion will be modified to focus on this issue.

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: If the qualified offsite circuit is required by the LCO to provide power to both Division 1 and Division 2, but is only providing power to one of the Divisions, then while the

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

qualified offsite circuit is inoperable, Required Action A.1 only requires declaring the affected Divisions (i.e., the Division without offsite power) features inoperable. A declaration of inoperability of the features remaining powered from the offsite circuit is not necessary, since the inoperable offsite circuit is still providing adequate power to these features. The Bases will be clarified to provide an example of this concept.

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: Per a phone conversation with the NRC subsequent to the receipt of this Request for Additional Information, the NRC requested that ComEd change the DOC from an L DOC to an LA DOC and relocate the requirement to a 50.59 controlled document. ComEd will submit a new LA DOC for this change.

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- | | |
|-----------------|-------------------|
| 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: The Quad Cities design includes two pair of air start receivers whose downstream piping is common. Each pair of air start receivers has adequate capacity to meet design requirements. Thus use of the word "required" in both Condition C and SR 3.8.3.2 appears correct. The Bases will be modified to more clearly describe the design.

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 |
-

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

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: The minimum acceptable capacity is calculated each time prior to the performance of the applicable battery test based on the current load profile. It was not added to the ITS since it is not currently in the CTS, and it can change over time. However, ITS SR 3.8.4.8 and the associated Bases will be modified to state that the minimum acceptable battery capacity is from the load profile. In addition, the second and third Frequencies will be applied as stated.

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: The justification is JFD 1 (changes made to reflect system description) as shown at the top of the ISTS page. The term was deleted since it is not currently in the UFSAR. However, both the 125 VDC and 250 VDC battery chargers can recharge the associated batteries as described in the ITS Bases within 24 hours. Therefore, the term will be added back into the ITS Bases.

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: The Bases will be clarified.

3.8.4-07 Not used.

3.8.4-08 Not used.

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

3.8.4-09 Not used.

3.8.4-10 Not used.

3.8.4-11 See Dresden RAI 3.8.4-3

ComEd Response: The alternate 125 VDC subsystem consists of a 125 VDC battery that can be manually placed in service during inoperabilities of the normal 125 VDC battery. Even though there is a battery charger associated with the alternate battery, it can only be used to maintain a float charge on the alternate battery; it is not a full capacity battery charger. Only the alternate battery in conjunction with one of the 125 VDC subsystem (full capacity) battery chargers (normal or spare charger) can be used to meet the requirements of Action 3.9.C.2.

The alternate 125 VDC batteries cannot be used to meet the requirements of the LCO. However, they can be used for a short time when the associated normal 125 VDC battery is inoperable, as stated in the CTS 3.9.C Actions and ITS 3.8.4 Required Actions B.1, C.1, and D.2. The Bases statement in the Background section will be revised to more clearly state the requirements and allowances.

As stated above, the alternate 125 VDC batteries cannot be used to meet the LCO requirements, thus they are not required to be continuously maintained Operable. However, when allowed by the ITS 3.8.4 Required Actions, one alternate 125 VDC battery and charger can substitute for the normal 125 VDC battery. Under this condition, the alternate 125 VDC battery is required to be Operable.

Even though there is a battery charger associated with the alternate battery, it is only used to maintain a float charge when the alternate battery is not connected to the DC bus. In order to meet the requirements of Required Actions B.1, C.1, and D.2, the alternate battery and one of the 125 VDC (normal or spare) battery chargers would be required to be placed in service. The battery chargers that would be placed in service are the chargers that are normally used to provide power to the DC bus and are tested in accordance with ITS SRs.

For the alternate 125 VDC subsystem to be Operable, all the applicable SRs of ITS 3.8.4 must be met; ITS SRs 3.8.4.1 through 3.8.4.8. Since the battery chargers are tested as part of the normal 125 VDC subsystem, the Bases statements in ACTIONS B.1 and B.2, and C.1 and C.2 that describe the Operability requirement for the alternate battery subsystem will be revised to remove any reference to a charger in regards to the alternate subsystem Surveillance Requirements. However, it was noted that this similar statement is not in the Bases for ACTIONS D.1 and D.2 (Required Action D.2 also allows the Operable alternate 125 VDC battery to be placed in service). This oversight will be corrected. Additionally, the Bases of ITS 3.8.4 will be revised to clearly define the alternate 125 VDC subsystem.

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

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: The above requested change will be made by using the same wording proposed by the NRC in Dresden RAI 3.8.6-1.

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: A new JFD will be provided to justify the proposed change.

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

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

was inoperable, Unit 1 would 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: The Table and associated footnote (a) is to be used on a per unit basis. The Unit 1 250 VDC buses are a single subsystem and the Unit 2 250 VDC buses are another single subsystem. For clarity and to avoid any misinterpretation, ITS Bases Table B 3.8.7-1, which lists all required buses, will be divided into two Tables, one for Unit 1 and one for Unit 2.

3.8.8, Distribution System - Shutdown

3.8.8-01 See Dresden RAI 3.8.8-01

ComEd Response: Comment 1: A new L DOC will be provided to justify the change.
Comment 2: The words "less than the" above required AC or DC distribution systems energized is synonymous with the words "one or more" AC or DC distribution subsystems inoperable. The words "less than" can mean one, two, or any number; therefore, it is not a "less restrictive" change. The change in terminology was made to be consistent with the ISTS, and it was mentioned in the last sentence of the M.1 DOC.

**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.d.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: The LaSalle 1 and 2 design does not include "load sequencers" as described in the Improved Standard Technical Specifications (ISTS), but includes time delay relays for individual components (e.g., Low Pressure Coolant Injection (LPCI) pumps). Therefore, ISTS 3.8.1 LCO item c and ISTS 3.8.1 ACTION F are not needed to be included in the LaSalle Improved Technical Specifications (ITS). The term "load sequencer" as used in Current Technical Specifications (CTS) 4.8.1.1.2.d.6.a.2 is taken to mean the time delay relays installed for the associated components. This term, "time delay relay," will be added into ITS SR 3.8.1.19.c.2 for Division s 1 and 2 using an "A" Discussion of Change (DOC) to describe the change from "load sequencers" to "time delay relays" and the "LA" DOC (LA.6) will be deleted.

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

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

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: ComEd will withdraw the proposed change and retain a 72 hour Allowed Outage Time (AOT) for the offsite circuits.

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: CTS 3.8.1.1.b, footnote *, allows the common DG to be inoperable for up to 7 days under certain conditions. This allowance is reflected in ITS 3.8.1 ACTION B. If the common DG is inoperable and these conditions are met, and subsequently an offsite circuit or another DG becomes inoperable, then the ISTS Completion Time of 6 days from discovery of failure to meet the LCO could unnecessarily limit the restoration time. For example, if the common DG has already been inoperable for 6 days, then when the second AC power source becomes inoperable, either ACTION A or C (depending upon whether an offsite circuit or additional DG became inoperable) would be entered. Upon entry into the applicable ACTION, the Completion Time of 6 days from discovery of failure to meet the LCO would be exceeded, and an immediate shutdown would be required. In addition, ITS Required Action B.4 cannot have a normal time of 7 days and a second time of 6 days from discovery of failure to meet the LCO, since the 7 day time could never be used. This was not the intent of this additional Completion Time. As stated in the ISTS Bases, the intent was to establish a limit on the maximum time allowed for any combination of required AC power sources to be inoperable

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

during any single contiguous occurrence of failing to meet the LCO. The ISTS time of 6 days was chosen since it was the sum of the 72 hours allowed for an offsite circuit and the 72 hours allowed for a DG. Since the LaSalle CTS allows a DG to have a 7 day Completion Time under certain conditions, the time was changed in the ITS to be the sum of 72 hours for the offsite circuit and the 7 days for the DG; i.e. 10 days. Therefore, the change appears justified and consistent with the intent of the ISTS.

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: ComEd will withdraw the change. However, ComEd will modify the Note in ITS SR 3.8.1.14, based on a recent license amendment, which provided an allowance to perform the Surveillance during power operation under certain conditions. Also, ComEd will not add the Note into ITS SR 3.8.1.15, since the ISTS does not require the restriction.

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

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

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: LaSalle currently does not require this portion of the test in their CTS. The Loss of Coolant Accident (LOCA) loads are not time-delayed when starting on offsite power; permanently connected loads remain energized (no load shedding) and automatically connected loads are started instantaneously. The system functional tests for the ECCS pumps will verify that the pumps immediately start when a LOCA signal is received. Therefore there is no need to test this feature in the Surveillance. A new Justification for Deviation (JFD) will be provided to justify this change.

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: Each DG has its own dedicated storage tank. In the ISTS Bases, this is clearly identified in the first sentence of the Background section. However, the CTS does not require the entire 7 day limit of 29,750 gallons to be in the storage tank. It requires that the combination of fuel oil in the storage tank and the day tank to meet the 7 day limit. The ITS has

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

maintained this allowance in ITS SR 3.8.3.1.b. However, since the Division 3 DG storage tanks do not meet the 7 day fuel oil requirement, the ISTS Bases was modified to replace the words "storage tank having a" with the word "stored." To clearly identify that each DG has a dedicated storage tank, the first sentence of the paragraph will be modified to say that each DG is provided with a storage tank, and that the Division 1 and 2 storage tanks, and the Division 3 storage tank and day tank, contain the 7 day fuel oil requirement. In addition, ITS SR 3.8.3.1 will be modified to clearly state that the Division 1 and 2 and opposite unit Division 2 DG storage tanks each contain the proper amount of fuel oil.

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: ITS SR 3.8.3.3 and the appropriate Bases will be modified to require both pairs of air start receivers.

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

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

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: ISTS SR 3.8.3.5 will be added into the LaSalle ITS with a 92 day Frequency, consistent with the Dresden and Quad Cities ITS Frequency.

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: ComEd will withdraw the proposed change. However, as previously discussed with the NRC technical reviewer, ComEd will also maintain the allowance that credit may be taken for unplanned events that satisfy the SR, since placing this allowance in the Bases is not correct. The Bases cannot change a Technical Specification requirement. Also, it should be noted that the proposed change only concerned the 125 VDC batteries. Neither the battery chargers nor the 250 VDC batteries currently have these restrictions. Therefore, the ITS will not add these restrictions to the battery charger and 250 VDC battery tests.

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

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

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: ITS 3.8.5 does not necessarily extend the 72 hours repair time to two inoperable or three inoperable divisions of 125 VDC; the allowance already exists in the CTS for some cases. CTS 3.8.2.4 only requires Division 1 or 2 battery and charger, and Division 3 battery and charger when the High Pressure Core Spray (HPCS) System is required Operable. Thus, the CTS currently allows both Division 1 and 2 batteries and chargers to be inoperable for 72 hours (provided the unit buses are cross-tied). The CTS does not allow the 72 hour time only when Division 1 or 2 and Division 3 batteries and chargers are required but inoperable. The M DOC will be modified to justify this change. In addition, while the current ITS submittal (revision B) allows other combinations that have not been discussed in the M DOC, ComEd will be adopting Technical Specifications Task Force (TSTF) - 204 in a future ITS revision. TSTF-204 modifies the LCO statement such that only Division 1 or 2 DC power source is required; not both. Therefore, justification for the additional combinations is not needed.

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: A new M DOC will be provided to justify the change when one control room area filtration subsystem is inoperable and the A DOC will be modified to cover only the case when both subsystems are inoperable.

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

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: A new L DOC will be provided to justify the change. In addition, new L DOCs will be provided to justify similar changes in ITS 3.8.2 and ITS 3.8.8.

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: The above requested change will be made.

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

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

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: DOC M.2 does state "two or more" electrical power subsystems result in a loss of function. The first sentence in the ISTS ACTIONS F.1 Bases (ITS ACTIONS G.1 Bases), which states that the Condition corresponds to a level of degradation in the electrical distribution system that causes a required safety function to be lost was modified by the parenthetical phrase "single division systems are not included, although for this ACTION Division 3 is considered redundant to Division 1 and 2 ECCS." This was added since the LaSalle design includes some systems that have only one subsystem, such that the loss of one electrical division results in the loss of the safety function. Therefore, to ensure correctness in the statement for the purpose of ITS Condition G, this parenthetical phrase was added. In addition, as discussed with the NRC reviewer during meetings concerning Section 3.8, an allowance to exempt single division systems that result in a loss of function will be added to ITS 3.8.7 Condition G and the Bases will be modified accordingly.

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

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

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
JDF 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: Neither the Quad Cities nor the Dresden Current Technical Specifications (CTS) have a requirement that an individual be responsible for the control room command function. During the Improved Technical Specification (ITS) review for the ComEd PWRs (Byron and Braidwood), the NRC allowed the title to be removed from the CTS and not be included in the ITS. The ITS for the ComEd PWRs only requires a Senior Reactor Operator (SRO) to have responsibility for the control room command function. Therefore, to be consistent with the previously approved ITS for the ComEd PWRs, Quad Cities and Dresden has proposed to add a similar requirement. Since the Quad Cities and Dresden CTS do not have this requirement, its addition to the ITS is a more restrictive change. ComEd currently has a corporate level procedure, applicable to all ComEd sites, that provides requirements for the control room command function, and believes that this is sufficient for detailing the actual individual who fills this position. Therefore, ComEd does not believe a change to the Quad Cities or Dresden ITS submittal to add a titled individual is necessary. In addition, while the LaSalle CTS does have a requirement that the Shift Manager designate the individual responsible for the control room command function, for the above described reasons, ComEd does not believe it is necessary for LaSalle to have this requirement in the ITS. Therefore, to be consistent with the other four ComEd sites, the LaSalle ITS should not be modified to include the titled individual.

5.0-2 TS 5.2.2 Unit Staff

JFD 8 states that changes of 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 your plant specific information that could result in not incorporating changes of TSTF-258.

ComEd Response: ComEd has always tried to maintain, to the extent practicable, the identical Administrative Controls Technical Specifications for each of the ComEd nuclear stations. Not incorporating TSTF-258 into the ComEd BWR ITS does not result in Technical Specifications that are in error or that are difficult to interpret. As part of ComEd's Business

Plan, ComEd is striving for consistent ITS requirements at all ComEd facilities, including the Administrative Controls section. Therefore, to be consistent with the other two ComEd sites, we choose not to incorporate TSTF-258. However, ISTS 5.2.2.b, which was deleted by TSTF-258 but maintained in the ComEd ITS for all three sites, will be deleted from the ITS.

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 is to 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: ComEd will make the above requested change (except the word "updated" will not be added), which was approved in TSTF-364.

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 NRC letter to Entergy Operations dated September 11, 1997, supported this clarification. Provide more details.

ComEd Response: The word "significant" will be deleted. The words "that could adversely affect the filter bank or charcoal adsorber capability" will be added after the words "...while it is in operation" at the end of the first paragraph of ITS 5.5.7 (Dresden and Quad Cities) and ITS 5.5.8 (LaSalle) and the words "that could adversely affect the charcoal adsorber capability" will be added after the words "... while it is in operation" at the end of the second paragraph of ITS 5.5.7 (Dresden and Quad Cities) and ITS 5.5.8 (LaSalle).

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: ITS 5.5.7.c (Dresden and Quad Cities) and ITS 5.5.8.c (LaSalle) states "...shows the methyl iodide penetration less than the value specified below..." Therefore, the use of the inequality signs in the insert is not needed.

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: The CTS for all three sites (CTS 4.8.1.1.2.c.2 - LaSalle; CTS 4.9.A.6.b - Dresden and Quad Cities) do not specify the applicable Standard; the CTS Bases provides this information. The CTS only requires particulate testing in accordance with the applicable ASTM standard. Therefore, consistent with the current licensing basis, which identifies all the applicable ASTM standard for fuel oil testing in the CTS Bases, the applicable ASTM standard for particulate testing is identified in the ITS Bases for SR 3.8.3.1 (Dresden and Quad Cities) and SR 3.8.3.2 (LaSalle).

5.0-7 TS 5.6.4 Monthly Operating Reports

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

ComEd Response: ComEd has always tried to maintain, to the extent practicable, the identical Administrative Controls Technical Specifications for each of the ComEd nuclear stations. Not incorporating TSTF-258 into the ComEd BWR ITS does not result in Technical Specifications that are in error or that are difficult to interpret. As part of ComEd's Business Plan, ComEd is striving for consistent ITS requirements at all ComEd facilities, including the Administrative Controls section. Therefore, to be consistent with the other two ComEd sites, we choose not to incorporate TSTF-258.

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: ComEd will adopt TSTF-363, which had been approved by the NRC.

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 ATSM 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 specification 5.5.10, "Diesel Fuel Oil Testing."

ComEd Response: See ComEd response to RAI 5.0-6.