October 4, 2001

MEMORANDUM TO: Biweekly Notice Coordinator

FROM: Stewart N. Bailey, Project Manager, Section 2 ***/RA/***
Project Directorate III
Division of Licensing Project Management, NRR

SUBJECT: REQUEST FOR PUBLICATION IN BIWEEKLY FR NOTICE - NOTICE OF CONSIDERATION OF ISSUANCE OF AMENDMENTS TO FACILITY OPERATING LICENSES, PROPOSED NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION, AND OPPORTUNITY FOR A HEARING (TAC NOS. MB2733 AND MB2734)

Exelon Generation Company, LLC, Docket Nos. 50-254 and 50-265, Quad Cities Nuclear Power Station, Units 1 and 2, Rock Island County, Illinois

Date of amendment request: August 13, 2001

Description of amendment request: The proposed amendments would revise technical specifications (TS) to support a planned upgrade to the reactor water level instrumentation. Currently, many low-level actuation functions use Yarway level indicating switches. This includes emergency core cooling system (ECCS), reactor core isolation cooling (RCIC) and feedwater systems. The Yarways will be replaced with more reliable analog level transmitters and additional electronic trip units. The upgrade will provide sensing devices for reactor vessel water level signals and indications that are more reliable with less drift and will require less frequent surveillance requirements. The proposed changes align the TS surveillance requirements with the instrumentation upgrades. This includes changes to calibration frequencies, functional testing and allowable values.

Basis for proposed no significant hazards consideration determination: As required by 10 CFR 50.91(a), the licensee has provided its analysis of the issue of no significant hazards consideration, which is presented below:

1. Does the proposed change involve a significant increase in the probability or consequences of an accident previously evaluated?

   During the upcoming refueling outages at Quad Cities Nuclear Power Station (Unit 1 and Unit 2), a design change will be implemented that upgrades the existing reactor vessel level trip instrumentation used in various applications at Quad Cities Nuclear Power Station, including the Emergency Core Cooling System (ECCS), Reactor Core Isolation Cooling System (RCIC) and Feedwater systems.

   Technical Specification (TS) requirements that govern operability or routine testing of plant instruments are not assumed to be initiators of any analyzed event because these instruments are intended to prevent, detect, or mitigate accidents. Therefore, these changes will not involve an increase in the probability of occurrence of an accident previously evaluated. Additionally, these changes will not increase the consequences of an accident previously evaluated because the proposed change does not adversely impact structures, systems, or components (SSCs). The planned instrument upgrade is a more reliable design than existing equipment. The proposed TS change maintains existing requirements that ensure components are operable when necessary for the prevention or mitigation of accidents or transients. Revised allowable values for the associated functions have been established in accordance with EGC's setpoint methodology, which is consistent with industry standards. The setpoint methodology establishes TS allowable values that assure systems structures and components (including initiation and trip functions) respond in a manner consistent with the plant safety analysis. Furthermore, there will be no change in the types or significant increase in the amounts of any effluents released offsite. For these reasons, the proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Does the proposed change create the possibility of a new or different kind of accident from any accident previously evaluated?

   The proposed changes support a planned instrumentation upgrade. The change provides revised Surveillance Requirements to ensure operability. The change does not adversely impact the manner in which the instrument will operate under normal and abnormal operating conditions. These changes reflect the improved performance of the instrumentation upgrade and provide an equivalent level of safety. The changes in methods governing normal plant operation are consistent with the current safety analysis assumptions. Therefore, these changes will not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. Does the proposed change involve a significant reduction in a margin of safety?

> The proposed change supports a planned instrumentation upgrade. The proposed change does not affect the probability of failure or availability of the affected instrumentation. The change to an analog trip system to monitor reactor vessel level provides for increased reliability. The change has no impact on the underlying design functions. The proposed TS surveillance requirements are consistent with current TS requirements for functions that employ analog trip unit devices. The proposed allowable values have been established in accordance with EGC's setpoint methodology, which considers instrument design and performance characteristics. The methodology establishes TS allowable values with sufficient margin to assure that the plant safety analysis assumptions (e.g., certain initiation and trip functions) are maintained. As such, the trip and actuation functions continue to ensure design basis requirements are maintained. Therefore, it is concluded that the proposed changes will not result in a reduction in the margin of safety.

The NRC staff has reviewed the licensee's analysis and, based on this review, it appears that the three standards of 10 CFR 50.92(c) are satisfied. Therefore, the NRC staff proposes to determine that the requested amendments involve no significant hazards consideration.

Attorney for licensee: Mr. Edward J. Cullen, Vice President, General Counsel, Exelon Generation Company, LLC, 300 Exelon Way, Kennett Square, PA 19348

NRC Section Chief: Anthony J. Mendiola

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