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December 26, 2001

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555 - 0001

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: Additional Information Supporting Technical Specification Changes to
Reactor Pressure Vessel Level Instrumentation Surveillance Frequencies
and Allowable Values Requirements

Reference: Letter from Timothy J. Tulon, Exelon Generating Company (EGC), LLC, to
U. S. NRC, "Request for Technical Specifications Changes to Modify
Reactor Pressure Vessel Level Instrumentation Surveillance Frequencies
and Allowable Values Requirements," dated August 13, 2001

In the above reference, Exelon Generation Company (EGC), LLC, submitted a Technical Specification amendment request for the Quad Cities Nuclear Power Station (QCNPS), Units 1 and 2. The proposed change would modify certain surveillance frequencies and allowable values to reflect a planned upgrade to the reactor pressure vessel (RPV) water level instrumentation.

In a telephone conference call on December 20, 2001, Mr. A. R. Haeger (EGC) and Mr. M. Chawla (U.S. NRC) discussed a request for additional information regarding the proposed change. The attachment to this letter provides the requested information.

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If you have any questions concerning this letter, please contact P. R. Simpson at (630) 657-2823.

Respectfully,



T. W. Simpkin
Manager - Licensing
Midwest Regional Operating Group

Attachment - Additional Information Supporting Technical Specification Changes to
Reactor Pressure Vessel Level Instrumentation Surveillance Frequencies
and Allowable Values Requirements

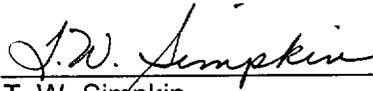
cc: Regional Administrator – NRC Region III
NRC Senior Resident Inspector – Quad Cities Nuclear Power Station
Office of Nuclear Facility Safety – Illinois Department of Nuclear Safety

STATE OF ILLINOIS)
COUNTY OF DUPAGE)
IN THE MATTER OF)
EXELON GENERATION COMPANY, LLC) Docket Numbers
QUAD CITIES NUCLEAR POWER STATION, UNITS 1 AND 2) 50-254 AND 50-265

**SUBJECT: Additional Information Supporting Technical Specification
Changes to Reactor Pressure Vessel Level Instrumentation
Surveillance Frequencies and Allowable Values Requirements**

AFFIDAVIT

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



T. W. Simpkin
Manager - Licensing
Midwest Regional Operating Group

Subscribed and sworn to before me, a Notary Public in and

for the State above named, this 26 day of

December, 2001.



Anese L. Grigsby



Attachment

Additional Information Supporting Technical Specification Changes to Reactor Pressure Vessel Level Instrumentation Surveillance Frequencies and Allowable Values Requirements

Question:

Justify the applicability of Electric Power Research Institute (EPRI) TR-103335, "Guidelines for Instrument Calibration Extension / Reduction Programs," to the reactor vessel level instrumentation for which the surveillance interval is being extended.

Response:

This modification provides a safety-related analog trip configuration that will perform the current function of the installed six Yarway reactor water level switches. The safety-related analog trip configurations which will take the place of these Yarway switches consist of Rosemount transmitters and Rosemount Model 710DU analog trip units. To be consistent with other Rosemount brand Reactor Protection System (RPS) trip units already installed at Quad Cities Nuclear Power Station (QCNPS), a 92-day calibration frequency has been selected for the trip units.

As part of the QCNPS Allowed Outage Time/Surveillance Test Interval (AOT/STI) Technical Specification upgrade, an evaluation of the instrument drift for Rosemount Model 710DU trip units was performed. This evaluation was performed in accordance with NES-EIC-20.4, "Analysis of Instrument Channel Setpoint Error and Instrument Loop Accuracy." Since the new trip units are the same model as previously evaluated and the calibration methods will remain unchanged, the results of those evaluations are directly applicable to the new installations.

Question:

Justify that the proposed functional test frequency for the analog trip units is consistent with previously approved evaluations for Quad Cities Nuclear Power Station.

Response:

The proposed functional test requirement implements recommendations resulting from evaluations performed by General Electric and the Boiling Water Reactor Owners' Group (BWROG) and subsequently approved by the NRC (i.e., improvements in instrumentation allowed outage times/surveillance test intervals - AOT/STI). QCNPS applied for the AOT/STI Technical Specifications enhancements in a License Amendment Request (LAR) dated December 27, 1999, which was subsequently approved by the NRC in a Safety Evaluation dated March 28, 2001. The LAR referenced BWROG reports NEDC-30851P-A and NEDC-30936P-A which evaluated the impact of extending functional testing requirements from monthly to quarterly. The base model for these evaluations included sensor channels with transmitter/analog trip unit devices. For these reasons, the proposed functional test frequency is consistent with previously approved evaluations.