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RS-03-076

April 7, 2003

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 Specifications Changes to Reactor Protection System Instrumentation Scram Discharge Volume Water Level – High

Reference: Letter from P. R. Simpson (Exelon Generation Company, LLC) to U. S. NRC, "Request for Technical Specifications Changes Related to Reactor Protection System Instrumentation (Scram Discharge Volume Water Level – High)," dated February 27, 2003

In the above reference, Exelon Generation Company, LLC (EGC) submitted a Technical Specifications (TS) amendment request for the Quad Cities Nuclear Power Station (QCNPS), Units 1 and 2. The proposed change would revise TS Table 3.3.1.1-1 to delete the reference to thermal switches in Function 7.a, and add Surveillance Requirement (SR) 3.3.1.1.11 to Function 7.b.

In a telephone conference call on March 26, 2003, the NRC requested additional information regarding the frequency for calibrating trip units in accordance with SR 3.3.1.1.11. The attachment to this letter provides the requested information.

A001

If you have any questions concerning this letter, please contact Thomas G. Roddey at (630) 657-2811.

I declare under penalty of perjury that the foregoing is true and correct.

Respectfully,

April 7, 2003
Executed on

Patrick R. Simpson
Manager – Licensing
Mid-West Regional Operating Group

Attachment: Response to Request for Additional Information

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

ATTACHMENT
Response to Request for Additional Information

Request

Provide references to the documents used to determine the 92-day frequency for the trip unit calibrations in Surveillance Requirement 3.3.1.1.11 of Technical Specifications Table 3.3.1.1-1.

Response

The proposed test requirements for the scram discharge volume instruments are consistent with licensing topical reports developed by General Electric and the Boiling Water Reactor Owners' Group (i.e., Allowed Outage Time/Surveillance Test Interval extensions - AOT/STI). Specifically, licensing topical report NEDC-30851P-A (Reference 1) provided justification for extending the calibration interval for analog trip units to three months in Section 5.7.3. The NRC approved NEDC-30851P-A by letters dated July 15, 1987, and January 24, 1988. Quad Cities Nuclear Power Station (QCNPS) applied for the AOT/STI Technical Specifications enhancements in Reference 2, which was subsequently approved by the NRC in Reference 3.

In addition, the associated Technical Specifications allowable value was determined in accordance with setpoint methodology described in nuclear standard NES-EIC-20.04, "Analysis of Instrument Channel Setpoint Error and Instrument Loop Accuracy." NES-EIC-20.04 was reviewed by the NRC in support of our conversion to the Improved Standard Technical Specifications (ITS). In Reference 4, the NRC approved ITS for QCNPS.

References

1. General Electric Licensing Topical Report NEDC-30851P-A, "Technical Specification Improvement Analysis for BWR Reactor Protection System," dated March 1988

2. Letter from R. M. Krich (Commonwealth Edison Company) to U. S. NRC, "Proposed Technical Specifications Change Surveillance Test Intervals and Allowable Outage Times for Protective Instrumentation," dated December 27, 1999

3. Letter from L. W. Rossbach (U. S. NRC) to O. D. Kingsley (Exelon Generation Company), "Quad Cities Nuclear Power Station, Units 1 and 2 – Issuance of Amendments (TAC Nos. MA7793 and MA7794)," dated March 28, 2001

4. Letter from S. N. Bailey (U. S. NRC) to O. D. Kingsley (Exelon Generation Company), "Issuance of Amendments (TAC Nos. MA8378 and MA8379)," dated March 30, 2001