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1400 Opus Place
Downers Grove, Illinois 60515

August 28, 1992

Dr. Thomas E. Murley, Director
Office of Nuclear Reactor Regulation
Nuclear Regulatory Commission
Washington, D.C. 20555

Attn: Document Control Desk

Subject: Dresden Nuclear Power Station Units 2 and 3
Quad Cities Nuclear Power Station Units 1 and 2
Supplemental Application for Amendment to Facility
Operating Licenses DPR-19, DPR-25, DPR-29, and DPR-30,
Appendix A, Technical Specifications
NRC Docket Nos. 50-237 and 50-249, 50-254, and 50-265

Reference: (a) M. Richter memo to T. Murley, dated August 9, 1991.
(b) P. Piet memo to T. Murley, dated June 29, 1992.

Dear Dr. Murley:

Pursuant to 10 CFR 50.90, Commonwealth Edison Company (CECo) proposes to supplement the Reference (b) submittal to amend Appendix A, Technical Specifications, of Facility Operating Licenses DPR-19, DPR-25, DPR-29, and DPR-30. The purpose of this supplemental request is to modify Pages 3/4.9-1 and 3/4.9-5 for Dresden, 3.9/4.9-2, 3.9/4.9-3, and 3.9/4.9-4 for Quad Cities Unit 1 and 3.9/4.9-2, 3.9/4.9-3, 3.9/4.9-4, and 3.9/4.9-5 for Quad Cities Unit 2 from the Reference (b) submittal. This change is based upon discussions held between representatives of CECo and the NRC Staff that transpired during the time period since the Reference (b) submittal. In addition, supplemental changes are proposed to Section 3.9.A.3 of Quad Cities' Technical Specifications necessary to effectuate a modification which allows the backfeed of power from the offsite distribution system through the main power transformer and unit auxiliary transformer of a shutdown unit to any operating unit through the 4160-volt bus tie. Although the same backfeed modification is being installed at Dresden, the current language of Dresden's Technical Specifications do not require the same change to the specifications.

As a note of clarification, the Reference (b) submittal only superceded Section 3/4.9 changes when comparing the Reference (a) and (b) submittals applicable to Dresden Station. CECo still wishes to pursue other proposed changes in Reference (a). It is requested that the proposed changes to Section 3/4.9 be approved prior to October 15, 1992 in order to support installation of the modifications at Quad Cities.

This supplemental request is subdivided as follows:

1. Attachment A gives a description and safety analysis of the proposed changes in this amendment.

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2. Attachment B includes the marked-up Technical Specification page with the requested changes included. Pages 3/4.9-1 and 3/4.9-5 for Dresden Units 2 and 3 and Pages 3.9/4.9-2, 3.9/4.9-3, 3.9/4.4-9 for Quad Cities Unit 1 and Pages 3.9/4.9-2, 3.9/4.9-3, 3.9/4.9-4, and 3.9/4.9-5 for Quad Cities Unit 2 are the only pages affected by this supplemental request.
3. Attachment C provides CECO's evaluation performed in accordance with 10 CFR 50.92(c), which confirms that no significant hazards consideration is involved.
4. Attachment D provides the Environmental Assessment.

This proposed amendment has been reviewed and approved by CECO On-Site and Off-Site Review in accordance with Commonwealth Edison procedures.

To the best of my knowledge and belief, the information contained within is true and correct. In some respect these statements are not based on my personal knowledge, but obtained information furnished by other Commonwealth Edison employees, contractor employees, and consultants. Such information has been reviewed in accordance with company practice, and I believe it to be reliable.

Commonwealth Edison is notifying the State of Illinois of this application for amendment by transmitting a copy of this letter and its attachments to the designated state official.

Please direct any questions you may have concerning this submittal to this office.

Very truly yours,



Peter L. Piet

Nuclear Licensing Administrator

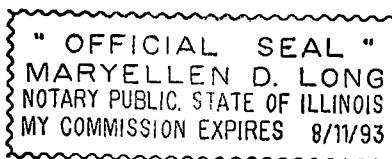
Attachments: A. Description and Safety Analysis of the Proposed Changes
B. Marked-up Technical Specification Pages
C. Evaluation of Significant Hazards Consideration
D. Environmental Assessment

cc: A. B. Davis, Regional Administrator - RIII
W. G. Rogers, Senior Resident Inspector - Dresden
T. E. Taylor, Senior Resident Inspector - Quad Cities
L. N. Olshan, NRR Project Manager
B. L. Siegel, NRR Project Manager
Illinois Department of Nuclear Safety

Signed before me on this 28 day

of AUGUST, 1992,

by Maryellen Long
Notary Public



ATTACHMENT A

DESCRIPTION AND SAFETY ANALYSIS OF PROPOSED CHANGES TO APPENDIX A, TECHNICAL SPECIFICATIONS OF FACILITY OPERATING LICENSES DPR-19, DPR-25, DPR-29, AND DPR-30

I. 125/250 VOLT DC BATTERY SURVEILLANCES

Current Specifications 4.9.A.3 for Dresden and 4.9.B.3 for Quad Cities Station requires a "rated load discharge test" for the station batteries on a refueling outage frequency. A review of battery testing specifications of other CECo nuclear units revealed that the LaSalle County Station Technical Specifications for battery service and performance testing closely resembled the testing that Dresden and Quad Cities committed to perform. The changes proposed in Reference (b) reflected these testing requirements.

Following the submittal of the Reference (b) Technical Specification amendment request, the NRC Staff requested CECo to modify proposed Specifications 4.9.A.4 and 4.9.A.5 for Dresden and 4.9.B.4 and 4.9.B.5 for Quad Cities Station to enhance the clarity and applicability of the requirements. These changes are summarized below.

4. At least once per 60 months, in lieu of the battery service test required by 4.9.A.3 [4.9.B.3 at Quad Cities], the Unit's batteries shall be subjected to a performance discharge test to verify that the battery capacity is the greater of either 80% of the manufacturer's rating or the minimum acceptable battery capacity from the latest revision of the load profile when subjected to a performance discharge test.
5. For any battery that shows signs of degradation or has reached 85% of the service life for the expected application as determined under Section 4.9.A.4 [4.9.B.4 for Quad Cities], a performance discharge test of battery capacity shall be performed at least once each refueling cycle. Degradation is indicated when the battery capacity drops more than 10% of rated capacity from its average on previous performance tests, or is below 90% of the manufacturer's rating.

These changes from the Reference (b) submittal clarify the proposed requirements and re-arrange the logical order for application of the requirements. This amendment is administrative in nature and does not have an adverse impact on plant safety. The proposed supplement does not constitute a physical change to the facility. These revisions do not adversely affect any of the accident initiators or initial assumptions used in the plant accident analyses.

ATTACHMENT A (continued)

II. ALTERNATE BATTERIES

The original design of the 125 volt DC battery distribution system for Dresden and Quad Cities Station only included a single manual disconnect switch at one end of the cable connecting the 125 VDC main bus to the 125 VDC reserve bus. In 1981, an evaluation of the 125 VDC distribution systems noted that a fire in the main 125 VDC bus switchgear could fault the cable used to provide the backup feed to the 125 VDC reserve bus with the ultimate result that both buses could be disabled. To address this concern, both Dresden and Quad Cities installed two (2) disconnect switches on the reserve bus end of the cable connecting the main bus with the reserve bus.

Both Dresden And Quad Cities proposed adding the alternate battery systems as a backup to the normal batteries. The alternate 125 VDC battery system design meets the isolation criteria of the original 125 VDC system for both Dresden and Quad Cities. The alternate battery design, however, does not include the additional disconnect switches between the reserve bus and main bus.

The alternate battery and its associated cables are a very low combustible load, producing very little heat due to a low BTU rating. The alternate battery does not cross a fire area boundary, is located in an area where fire detectors are present, and will initiate any abnormal conditions to the Control Room. In addition, there is a portable CO2 extinguisher suppression system available in the area. The existing fire detection system is sufficient for the additional fire loading due to the alternate battery.

Dresden and Quad Cities Station propose adding the alternate battery as a permanent auxiliary method of ensuring plant DC power sources are available in the event that the normal 125 VDC system is unavailable. This requirement would be waived for a period up to seven days if the alternate 125 VDC battery system was placed into service and operable as defined by the applicable surveillance requirements. The current requirements at Dresden allow the 125 VDC system to be inoperable for a period of seven days per operating cycle for maintenance or testing. In addition, Dresden's requirements allow an additional seven days if the battery needs to be replaced due to maintenance or testing. The current requirements at Quad Cities allow the 125 VDC system to be inoperable for any reason for a period of three days.

The alternate 125 VDC battery system does not provide the same protection from the consequences of loss of function as specified in Appendix R. Therefore, during periods when using the alternate 125 volt battery, administrative controls shall be instituted to reduce the risk of causing a fault to the system. However, plant safety and reliability are enhanced by the addition of the backup to the normal 125 VDC battery system in the event the normal 125 VDC system is made or found to be inoperable. The probability of usage of the 125 VDC system coincident with a loss of function event (Appendix R) is remote. However, the proposed limited usage requirements during both operation and cold shutdown or refueling and the net gain to plant safety and reliability by the usage of the alternate 125 VDC battery system as a backup, conservatively bound the probability of such an event.

ATTACHMENT A (continued)

The proposed changes for the 125 VDC battery system during operation are specified as follows:

- a. With both units operating, each 125 volt battery may be inoperable for up to a maximum of seven days per operating cycle for maintenance and testing provided the alternate 125 volt battery is placed into service and is operable per specification 4.9.A.6 [4.9.B.6 for Quad Cities].
- b. With the other unit in cold shutdown or refueling, operations may continue with one of the two 125 volt battery systems inoperable provided the alternate 125 volt battery is placed into service and is operable per specification 4.9.A.6 [4.9.B.6 for Quad Cities].
- c. If it is determined that a 125 volt battery need be replaced as a result of maintenance or testing, a specific battery may be inoperable for an additional seven days provided the alternate 125 volt battery is placed into service and is operable per specification 4.9.A.6 [4.9.B.6 for Quad Cities].

The proposed supplemental changes to the 125 VDC battery system does not have an adverse impact on plant safety. The proposed supplement does not constitute a physical change to the facility or to its operation. These revisions do not adversely affect any of the accident initiators or initial assumptions used in the plant accident analyses.

III. BACKFEED MODIFICATION CHANGES (QUAD CITIES ONLY)

Current Technical Specification 3.9.A.3 at Quad Cities provides the requirement for the availability of a second source of offsite auxiliary power during reactor operation. This source of offsite auxiliary power is specifically described as:

"One other 345-kv line and unit reserve auxiliary power transformer capable of carrying power to an essential electrical bus of the unit through the 4160-volt bus tie shall be available."

The current requirement ensures that two independent sources of offsite auxiliary power are available to provide the necessary power for loads which are required to operate to mitigate the consequences of postulated abnormal occurrences and design basis accidents. The two sources of offsite power are provided from the offsite transmission system through the unit reserve auxiliary power transformer (RAT), and the other unit's RAT via a 4160-volt bus tie. Operability and surveillance requirements for the 4160-volt bus tie were added to the Technical Specifications by an SER dated August 6, 1987. These requirements established the opposite unit's RAT and 4160 volt bus tie as a second source of offsite power, as required by General Design Criteria (GDC) 17. Prior to the addition of these requirements, the 4160-volt bus tie was required to be operable only if offsite power to one of the two units was unavailable.

ATTACHMENT A (continued)

The current requirement specifically delineates that the other unit's reserve auxiliary transformer shall be used as the second source of offsite power. Based upon a loss-of-offsite power event at Dresden Station in 1985 and the recognition of transformer aging concerns, CECo initiated an engineering evaluation at Dresden and Quad Cities Stations to identify modifications and/or procedure changes which would be necessary to provide a second source of offsite power when the RAT is unavailable. Based upon the engineering evaluation, CECo will be implementing modifications and procedure changes at both stations which will allow the backfeed of power from the offsite distribution system through the main power transformer (MPT) and unit auxiliary transformer (UAT) of a shutdown unit to an operating unit through the 4160-volt bus tie. The importance of these modifications and procedure changes was highlighted at Quad Cities Station in April 1991 when Unit 2 was shutdown from 100% power in order to affect repairs to the Unit 1 RAT (Licensee Event Report 91-005).

Currently, both Dresden and Quad Cities Station will be implementing the required protective relay modifications during the next refuel outage on each unit. However, in order to utilize the backfeed option when the RAT of the shutdown unit is unavailable, Quad Cities Technical Specification 3.9.A.3 (DPR-29 and DPR-30) must be revised to account for the ability to supply offsite power through the MPT/UAT and 4160-volt bus tie. Dresden Station Technical Specification 3.9.A.3 requires an offsite line capable of carrying power to an essential service bus through the 4160-volt bus tie. This will not require any changes in order to implement backfeed through the MPT/UAT.

The proposed amendment to Quad Cities Technical Specification 3.9.A.3 for Unit 2 (DPR-30) will be necessary following implementation of the modification on Unit 1 in October 1992. Subsequent to the completion of the modifications to Unit 1, the Unit 1 RAT (TR-12) will be taken out-of-service for repair, inspection and testing. The duration of planned work activities for TR-12 is currently 14 days. This would result in the shutdown of Unit 2 within seven days if the proposed Technical Specification amendment is not implemented by that time.

The proposed amendment will delete the current requirement for Technical Specification 3.9.A.3 and adopt the wording of Dresden Technical Specification 3.9.A.3. This will state:

"One other 345-kv line capable of carrying auxiliary power to an essential electrical bus of the unit through the 4160-volt bus tie shall be available."

The proposed amendment will continue to provide the same level of offsite power sources to the unit since it will require the operability of two offsite power sources. The amendment will provide additional flexibility by allowing the use of the MPT and UAT of a shutdown unit to supply power through the 4160-volt bus tie to an operating unit during extended RAT outages. This flexibility will prevent the unnecessary shutdown (and associated thermal cycling) of operating reactors.

In addition, the proposed amendment will enhance consistency between the Technical Specification of Dresden and Quad Cities Station.