

50-237

CEC

DRESDEN 2

PROPOSED CHANGE TO TECH SPECS RE TECH
SPECS UPGRADE PROGRAM

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ATTACHMENT 1

EXECUTIVE SUMMARY

Technical Specification 3/4.6

"PRIMARY SYSTEM BOUNDARY"

EXECUTIVE SUMMARY

The Dresden Technical Specification Upgrade Program (TSUP) was conceptualized in response to lessons learned from the Diagnostic Evaluation Team inspection and the frequent need for Technical Specification interpretations. A comparison study of the Standard Technical Specifications (STS), later operating plant's Technical Specifications provisions and Quad Cities Technical Specifications was performed prior to the Dresden TSUP effort. The study identified potential improvements in clarifying requirements and requirements which are no longer consistent with current industry practices. The Dresden TSUP will enhance the Quad Cities TSUP currently under review by the NRC. As a result of the inconsistencies in the Quad Cities submittal compared to the Standard Technical Specifications (STS), Dresden's submittal will more closely follow the provisions of STS and in conjunction, Quad Cities will amend their submittal so that Quad Cities and Dresden are identical within equipment and plant design. The format for the Dresden TSUP will remain as a two column layout for human factors considerations. Additionally, chapter organizations will remain unchanged.

The TSUP is not intended to be a complete adoption for the STS. Overall, the Dresden custom Technical Specifications provide for the safe operation of the plant and therefore, only an upgrade is deemed necessary.

In response to an NRC recommendation, Quad Cities combined the Unit 1 and Unit 2 Technical Specifications into one document. The Dresden Unit 2 and Unit 3 Technical Specifications will also be combined into one document. To accomplish the combination of the Units' Technical Specification, a comparison of the Unit 2 and Unit 3 Technical Specification was performed to identify any technical differences. The technical differences are identified in the proposed amendment package for each section.

The TSUP was identified as a station top priority and is currently contained in the Dresden Management Action Plan (DMAP). The TSUP goal is to provide a better tool to station personnel to implement their responsibilities and to ensure Dresden Station is operated in accordance with current industry practices. The improved Technical Specifications provide for enhanced operation of the plant. The program improves the operator's ability to use the Technical Specifications by more clearly defining the Limiting Conditions for Operation and required actions. The most significant improvement to the specifications is the addition of equipment operability requirements during shutdown conditions.

EXECUTIVE SUMMARY
(continued)
PROPOSED CHANGES TO TECHNICAL SPECIFICATION
SECTION 3/4.6, "PRIMARY SYSTEM BOUNDARY"

The proposed changes delete the present Objective statement and provides Applicability statements within each specification in accordance with STS guidelines. The proposed Applicability statements included the Operating Modes or other conditions for which the LCO must be satisfied. An STS type of format is proposed which retains the present two column format.

Specification 3/4.6 has been reordered and new titles have been added based on STS arrangements and nomenclature. Some sections have moved to the appropriate STS section.

A. Recirculation Loops

Proposed Specification 3/4.6.A has been titled "Recirculation Loops" and is a rewrite of existing specifications. Proposed Actions and Surveillances are changed to match STS guidelines and format. Dresden is proposing to delete Thermal Hydraulic Stability requirements from the Technical Specifications and control these requirements administratively. The current version of Quad Cities' Technical Specifications do not contain Stability requirements. The requirements for Single Loop Operation (SLO) are being upgraded to be consistent with LaSalle County Station.

B. Jet Pumps

Proposed Specification 3/4.6.B, "Jet Pumps", is a rewrite of existing specifications. Proposed Actions and Surveillances are changed to match STS guidelines and format and do not remove any major requirements from the current specifications. The requirements for Single Loop Operation (SLO) are being upgraded to be consistent with LaSalle County Station.

C. Recirculation Pumps

Proposed Specification 3/4.6.C, "Recirculation Pumps", is a rewrite of existing specifications. Proposed Actions and Surveillances are changed to match STS guidelines and format and do not remove any major requirements from the current specifications.

D. Idle Recirculation Loop Startup

Proposed Specification 3/4.6.D, "Idle Recirculation Loop Startup", is a rewrite of existing specifications. Proposed Actions and Surveillances are changed to match STS guidelines and format.

E. Safety Valves

Proposed Specification 3/4.6.E, "Safety Valves", is a rewrite of existing specifications. Proposed Actions and Surveillances are changed to match STS type format for systems and applications applicable to both Dresden and Quad Cities Stations. Any deviations are based upon precedence from LaSalle County Station's requirements.

F. Relief Valves

Proposed Specification 3/4.6.F, "Relief Valves," is a rewrite of existing specifications. Proposed Actions and Surveillances are changed to match STS type format for the design applicable to both Dresden and Quad Cities.

G. Leakage Detection Systems

Proposed Specification 3/4.6.G, "Leakage Detection Systems", is a rewrite of existing specifications. Proposed Actions and Surveillances are changed to match STS type format.

H. Operational Leakage

Proposed Specification 3/4.6.H, "Operational Leakage", is a rewrite of existing specifications. Proposed Actions and Surveillances are changed to match STS type format for systems and applications applicable to both Dresden and Quad Cities Stations. Changes from STS are based upon precedence from LaSalle County Station regarding CECO's response to Generic Letter 88-01 as applicable to Dresden and Quad Cities.

I. Chemistry

Proposed Specification 3/4.6.I, "Chemistry", is a rewrite of existing specifications. Proposed Actions and Surveillances are changed to match STS type format.

J. Specific Activity

Proposed Specification 3/4.6.J, "Specific Activity", is a rewrite of existing specifications. Proposed Actions and Surveillances are changed to match STS type format.

K. Pressure/Temperature Limits

Proposed Specification 3/4.6.K, "Pressure/Temperature Limits", is a rewrite of existing specifications. Proposed Actions and Surveillances are changed to match STS type format. Changes from STS are based upon the guidelines suggested by Generic Letter 91-01, "Removal of the Schedule for the Withdrawal of Reactor Vessel Material Specimens from the Technical Specifications."

L. Reactor Steam Dome

Proposed Specification 3/4.6.L, "Reactor Steam Dome", is a new specification. Proposed Actions and Surveillances are adopted from STS.

M. Main Steam Line Isolation Valves

Proposed Specification 3/4.6.M, "Main Steam Line Isolation Valves", is a rewrite of existing specifications. Proposed Actions and Surveillances are changed to match STS type format.

N. Structural Integrity

Proposed Specification 3/4.6.N, "Structural Integrity", is a rewrite of existing specifications. Proposed Actions and Surveillances are changed to match STS type format.

O. Shutdown Cooling - HOT SHUTDOWN

Proposed Specification 3/4.6.O "Shutdown Cooling - HOT SHUTDOWN", is a rewrite of existing specifications. Proposed Actions and Surveillances are changed to match STS type format for systems and applications applicable to both Dresden and Quad Cities Stations. The Shutdown Cooling systems in place at Dresden and Quad Cities Station cannot meet strict STS requirements due to design limitations. The proposed requirements ensure the minimum level of temperature control is maintained when applicable.

P. Shutdown Cooling - COLD SHUTDOWN

Proposed Specification 3/4.6.P, "Shutdown Cooling - COLD SHUTDOWN", is a rewrite of existing specifications. Proposed Actions and Surveillances are changed to match STS type format for systems and applications applicable to both Dresden and Quad Cities Stations. The Shutdown Cooling systems in place at Dresden and Quad Cities Station cannot meet strict STS requirements due to design limitations. The proposed requirements ensure the minimum level of temperature control is maintained when applicable.

BASES

The proposed changes to the 3/4.6 Bases are made to support the changes proposed to the individual specifications.

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DESCRIPTION OF CHANGES

Technical Specification 3/4.6

"PRIMARY SYSTEM BOUNDARY"

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DESCRIPTION OF AMENDMENT REQUEST

The changes proposed in this amendment request are made to 1) improve the understanding and usability of the present technical specifications, 2) incorporate technical improvements, and 3) include some provisions from later operating BWR plants.

GENERIC CHANGES

The present Dresden and Quad Cities technical specifications contain Applicability and Objective statements at the beginning of most sections. These statements are generic in nature and do not provide any useful information to the user of the technical specifications. The proposed change will delete the Objective statement and provide Applicability statements within each specification similar to the STS. The proposed Applicability statement to be included in each specification will include the Reactor Operational Modes or other conditions for which the LCO must be satisfied.

The STS action provisions which delineate a specification 3.0.4 exception are not incorporated into the proposed specifications. The incorporation of the Generic Letter 87-09 change to the STS specification 3.0.4 (Dresden and Quad Cities proposed 3.0.D specification) requires that each action be independently evaluated for applicability of the new specification. These evaluations are provided in Attachment 7.

Description and Bases for the Proposed Changes

A. Recirculation Loops

1. Proposed Specification 3/4.6.A has been titled "Recirculation Loops" and is a rewrite of existing specifications. Proposed Actions and Surveillances are changed to match STS guidelines and format. Dresden is proposing to delete Thermal Hydraulic Stability requirements from the Technical Specifications and control these requirements administratively. The current version of Quad Cities' Technical Specifications do not contain Stability requirements. The requirements for Single Loop Operation (SLO) are being upgraded to be consistent with LaSalle County Station.
2. The proposed amendment request does not incorporate the Footnote in the Applicability Section of STS concerning a Special Test Exception. This Footnote was intended for first cycle startup programs and is not applicable to Dresden and Quad Cities Station. This follows the precedence from LaSalle County (see p. 3/4.4-1 of LaSalle County Station Technical Specifications).
3. Proposed Actions 1 and 2 for SLO follow the requirements recently proposed by Dresden and Quad Cities to the NRC Staff and incorporated into the LaSalle County Technical Specifications. These Actions are consistent to the safety analysis assumptions for Dresden and Quad Cities Stations. The 24 hour time frame allows adequate time to make the compensatory measures required for SLO. The 24 hour

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time frame is currently within the Quad Cities Technical Specification and has also been approved for other plants such as Hatch Unit 2.

4. The proposed Action requirements do not incorporate STS guidelines for Thermal Hydraulic Stability. This is consistent to the current version of Quad Cities' Technical Specifications. Dresden is proposing deleting Section 3.6.H.3.b, 3.6.H.3.c, 3.6.H.3.e, 4.6.H.3.a, 4.6.H.3.b, and Figure 3.6.2 from the current version of the Dresden Technical Specifications regarding Stability. Plant operation is currently prohibited from entering power/flow regions susceptible to Thermal Hydraulic instabilities. These requirements are controlled administratively through appropriate site procedures. Therefore, the proposed changes do not alter the current requirements and do not reduce the margin of safety for the station.
5. Dresden is proposing deleting Section 3.6.H.3.e and Quad Cities Section 3.6.H.3.d from the current versions of their Technical Specifications. This section concerns the isolation of the suction valve of the idle recirculation loop during SLO. The current requirements specify that the suction valve shall be closed and isolated during SLO. Both Dresden and Quad Cities are proposing modifying this requirement to allow this valve to be open during SLO to prevent cooldown of the idle loop which may lead to excessive thermal stresses. This change is being submitted separately as a dual-technical-submittal for Dresden and Quad Cities and has been approved by the appropriate fuel vendor (SNP and GE, respectively) with respect to safety analysis concerns.
6. Section 3.6.H.4 of the current Dresden Technical Specifications (operation with Natural Circulation flow) is not being maintained within the proposed amendment request. These requirements are outdated and not consistent with current industry standards and is no longer applicable to Dresden Station. This is consistent to proposed changes to the Safety Limits/LSSS Sections of the Quad Cities Technical Specifications.
7. STS surveillance requirement 4.4.1.1.1 is not adopted in the proposed specifications because both Dresden and Quad Cities are LPCI loop select plants. The STS surveillance was added for plants that made modifications to remove the LPCI loop select logic because the recirculation pump discharge valve is required to close upon initiation of LPCI. Because Dresden and Quad Cities still utilize the LPCI loop select logic, the surveillance is not applicable as documented in the Systematic Evaluation Program Topic III-10.C.
8. To minimize the inadvertent recirculation pump startup, an action is conservatively added to the proposed specifications that require the idle recirculation pump to be electrically prohibited from starting within 24 hours of initiation of single loop operation.

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B. Jet Pumps

1. Proposed Specification 3/4.6.B, "Jet Pumps", is a rewrite of existing specifications. Proposed Actions and Surveillances are changed to match STS guidelines and format and do not remove any major requirements from the current specifications. The surveillance requirements for Single Loop Operation (SLO) are being upgraded to be consistent with LaSalle County Station. The surveillances add additional requirements to increase the margin of safety for the site.
2. Current actions contained within the Quad Cities specifications for jet pump flow indication inoperability have been evaluated for use in TSUP. The proposed changes have been found to be acceptable. The current actions allow 2 jet pump flow indicators to be inoperable provided they are not on the same riser nor are they both the double-tap calibrated jet pumps on the same recirculation loop. The NRC approved the provision for Quad Cities in a Safety Evaluation dated May 23, 1990. The assumptions used in the Quad Cities analysis and referenced in the safety evaluation have been maintained for Quad Cities. The assumed values for measure total core flow are bounded by the values used in the Quad Cities analysis. The proposed changes do not impact the current safety analysis. Dresden's proposed package is consistent to STS guidelines.
3. The STS surveillances are modified slightly to eliminate the requirement of performing the jet pump surveillances prior to exceeding 25% of rated thermal power. Provisions approved within the River Bend Technical Specifications allow power to be increased above 25% of rated thermal power without performing the required surveillances as long as the surveillances are performed within 24 hours of exceeding 25% of rated thermal power.

C. Recirculation Pumps

1. Proposed Specification 3/4.6.C, "Recirculation Pumps", is a rewrite of existing specifications. Proposed Actions and Surveillances are changed to match STS guidelines and format and do not remove any major requirements from the current specifications.
2. The proposed LCO implements the current requirements for recirculation pump flow mismatch limitations based on core thermal power which is slightly different than the STS. The STS specification delineates total core flow as the threshold for the mismatch limits. The current specifications have been in effect since initial licensing and are used in all of the transient analyses and therefore are retained.
3. The proposed action requires one of the pumps to be tripped. The action is different from the STS but is required to ensure that the LPCI loop select logic will function.

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4. The proposed amendment request does not incorporate the Footnote in the Applicability Section of STS concerning Special Test Exception. This Footnote was intended for first cycle startup programs and is not applicable to Dresden and Quad Cities Station. This follows the precedence from the LaSalle County Technical Specifications.

4. The Applicability statement includes the specific reference to both recirculation pumps in operation. This follows the precedence set in the LaSalle County Technical Specifications and clarifies this requirement. Single Loop Operational restrictions are delineated elsewhere (3/4.6.A) in the proposed Technical Specifications for Dresden and Quad Cities Stations.

D. Idle Recirculation Loop Startup

1. Proposed Specification 3/4.6.D, "Idle Recirculation Loop Startup", is an upgrade to existing specifications. Proposed Actions and Surveillances are changed to match STS guidelines and format and will add additional limitations on plant operation. Plant specific parameters for temperature differential (145°F) are consistent to plant safety analyses and are therefore, acceptable for inclusion into the proposed amendment request. The requirements outlined within the Quad Cities Technical Specifications (3.6.A.4) are being maintained in the proposed amendment request and are consistent to STS.

2. A footnote is added to the temperature differentials based on the Perry and River Bend Technical Specifications. The footnote requires the differential temperatures to be met only when reactor pressure is greater than 25 psig. The footnote is added because the saturated steam temperature is used to determine the temperature differential and thus, adequate steam space pressure is required to evaluate the limiting condition.

E. Safety Valves

1. Proposed Specification 3/4.6.E, "Safety Valves", is an upgrade to existing specifications. Proposed Actions and Surveillances are changed to match STS type format for systems and applications applicable to both Dresden and Quad Cities Stations and will add additional limitations on plant operation. Overpressure protection is provided by four relief valves, eight safety valves and one combination safety/relief valve. Standard Technical Specifications are developed assuming all of the overpressure protection valves are combination safety/relief valves. Therefore, due to the design of Dresden and Quad Cities the specification is split into two separate specifications with the applicable standard actions and surveillance requirements presented in each of the Limiting Conditions for Operation

2. The proposed amendment request does not include the requirements outlined within STS section 4.4.2.1.1. These requirements are not applicable to the safety valve design at both Dresden and Quad Cities Stations. The NRC Staff has previously

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approved such an exception as noted within the LaSalle County Technical Specifications. Therefore, because of the design of safety valves at Dresden and Quad Cities Station, this deviation from STS guidelines is being proposed.

3. The proposed amendment request modifies the requirements outlined within STS section 4.4.2.2. Dresden and Quad Cities safety valve design incorporates acoustic monitors and tailpipe temperature indicators. Therefore, the STS requirements are modified to match the design differences at Dresden and Quad Cities.

F. Relief Valves

1. The relief valve limiting condition for operation is a combination of the STS specifications 3/4.4.2.1 and 3/4.4.2.2. Because of the design differences, the relief valves include actions and surveillances from both specifications. Overpressure protection is provided by four relief valves, eight safety valves and one combination safety/relief valve. Standard Technical Specifications are developed assuming all of the overpressure protection valves are combination safety/relief valves. Therefore, due to the design of Dresden and Quad Cities the specification is split into two separate specifications with the applicable standard actions and surveillance requirements presented in each of the Limiting Conditions for Operation
2. The Dresden and Quad Cities relief valve design does not include a low-set logic function but does include a time delay for re-actuation of two relief valves. The two lowest set relief valves incorporate a time delay for re-opening to allow the steam/water mixture to fully clear the discharge piping prior to the relief valve re-opening.
3. The proposed footnote that states "The provisions of Specification 4.0.D are not applicable provided the surveillance is performed within 12 hours after reactor steam pressure is adequate to perform the test." is also based upon precedence set within the LaSalle County Technical Specifications (Section 3/4.2). This relaxation allows the station to change modes without performing the specified Channel Calibration for a short time period until reactor operating conditions are more conducive for the performance of the test. This change from STS is consistent to industry standards.
4. Proposed Action 1 has been modified from the STS based on an approved amendment for Grand Gulf Station. The approved amendment deleted the two-minute time limit for closing a stuck open relief valve. The requirement was deleted because it did not allow sufficient time for operator action based on a stuck-open relief valve event at the station. The FSAR does not take credit for a reactor shutdown within two minutes following the determination that a relief valve is stuck open. Adequate capability of the suppression pool to perform its steam suppression function is maintained by Specification 3.7.G by specifying minimum

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pool water level and maximum pool water temperature. Suppression pool temperatures exceeding the 110°F suppression pool temperature limit would still require a reactor shutdown.

5. Proposed Action 2 is consistent to STS guidelines but includes plant specific parameters for suppression pool average water temperature. The proposed amendment is consistent to the plant safety analyses and increases the margin of safety by more explicitly defining actions to take in the event suppression water temperature is too great without the full complement of relief valves available.
 6. Proposed LCO 3.6.F does not include 'close' settings. The requirements from the current Technical Specifications that do not include close settings have been retained in TSUP.
 7. Proposed SR 4.6.F.1 does not include a calibration of the Trip Units. The Dresden and Quad Cities system design does not have analog trip units; therefore, the STS guidelines are not applicable for Dresden and Quad Cities.
- G. Leakage Detection Systems
1. Proposed Specification 3/4.6.G, "Leakage Detection Systems", is a rewrite of existing specifications. Proposed Actions and Surveillances are changed to match STS type format. There are no technical differences comparing the proposed amendment request for both Dresden and Quad Cities to STS guidelines. The proposed changes are consistent to the safety analyses for both Dresden and Quad Cities Station and are therefore acceptable.
 2. STS 3.4.3.1.c for containment air cooler condensate flow rate monitoring system is not applicable to Dresden and Quad Cities. Neither station has this system in their design and therefore, it is not adopted in the proposed specifications.
 3. The STS action for inoperable leakage detection is separated into two distinct actions for inoperable systems. The first action would allow operation for 24 hours with the primary containment atmosphere sampling. The second action would allow continued operation for up to 24 hours with the drywell floor drain sump system inoperable. Proposed Action 1 is more conservative than STS and is necessary due to the design limitations of the systems at Dresden and Quad Cities Stations. The proposed action is equivalent to STS and have been previously approved for River Bend.
- H. Operational Leakage
1. Proposed Specification 3/4.6.H, "Operational Leakage", is a rewrite of existing specifications. Proposed Actions and Surveillances are changed to match STS type format for systems and applications applicable to both Dresden and Quad Cities Stations. Changes from STS are based upon precedence from LaSalle

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County Station regarding CECO's response for LaSalle County to Generic Letter (GL) 88-01 and are consistent with Dresden and Quad Cities response to GL 88-01.

2. Proposed Section 3.6.H.4 follows the precedence of River Bend. These requirements limit the site to a maximum increase of 2 gpm of unidentified leakage within any 24-hour period while in operational mode 1. Unidentified leakage is new leakage above and beyond normal unidentified leakage currently identified as baseline for the plant. This is more conservative than the current requirements which allow the site to operate with reactor coolant leakage into primary containment from unidentified sources up to 5 gpm (current section 3.6.D.1 for Dresden and Quad Cities).
3. STS LCO requirement 3.4.3.2.d on leakage limits from any reactor coolant system pressure isolation valve and the associated actions are not adopted within the proposed specification. The NRC issued Generic Letter 87-06, Periodic Verification of Leak Tight Integrity of Pressure Isolation Valves, to verify that each licensee contains methods of assuring the leak-tight integrity of all pressure isolation valves. In response to the Generic Letter, Dresden and Quad Cities Stations outlined the methods currently implemented for assuring the leak-tight integrity of all the pressure isolation valves as independent barriers of the reactor coolant systems. Neither Dresden nor Quad Cities designs includes high pressure to low pressure interface valve leakage pressure monitors. Therefore, both Dresden and Quad Cities utilize other existing instrumentation for determination of leakage through a pressure boundary isolation valve. A detailed listing of the compensatory requirements was submitted to the NRC on June 11, 1987. As a result of the detailed review of the subject and the design limitations at Dresden and Quad Cities, the STS LCO for reactor coolant system pressure isolation valve leakage limits are not adopted within the proposed Technical Specifications. Additionally, STS 3.4.3.2 Action c is not adopted for the same reasons.
4. Section 3.4.3.2, Action d within STS for this section has not been included within the proposed amendment request. These requirements are not included within the current Technical Specifications for Dresden and Quad Cities as system/equipment design is not applicable to the STS requirements.
5. Section 3.4.3.2, Action e within STS is proposed as Action 3 within the proposed amendment request. The proposed amendment request follows the precedence set at River Bend Station. These requirements were approved by the NRC Staff.
6. Table 3.4.3.2-1 of STS is not included within the proposed amendment. This follows the guidelines specified in GL 91-08 that allows the deletion of Tables of component lists if the lists are administratively maintained outside of the Technical Specifications. These changes are in keeping with the current requirements for both Dresden and Quad Cities Stations and do not adversely affect any accident analysis assumptions for the site.

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7. Section 4.4.3.2.1.b of STS guidelines have been adopted. The proposed specifications require monitoring the primary containment sump flow rate on average once per 8 hours, but not to exceed 12 hours.
8. STS surveillance 4.4.3.2.1.d is not included within the proposed amendment. The reactor vessel head flange leak detection systems at Dresden and Quad Cities are not continuously operated in accordance with General Electric Service Information Letter (SIL) Number 42. SIL 42 strongly recommended that operation of the reactor vessel head flange leakage monitoring system be avoided once leakage through the first seal has been detected. Operating experience has shown that the amount of steam leakage through the inner seal of the reactor vessel head flange increases after each operation of the seal leak monitoring system. Failure of the second seal is detected using the primary containment leak detection systems.
9. STS surveillance 4.4.3.2.2 for reactor coolant system pressure isolation valves was not retained in the proposed specifications because the LCO was not adopted. The STS guidelines are not applicable to the Dresden and Quad Cities design.
10. Section 4.4.3.2.3 of STS guidelines have not been incorporated within the proposed Technical Specification amendment. These requirements are not included within the current Technical Specifications for Dresden and Quad Cities as system/equipment design is not applicable to the STS requirements.

- I. Chemistry

1. Proposed Specification 3/4.6.I, "Chemistry", is a rewrite of existing specifications. Proposed Actions and Surveillances are changed to match STS type format. There are no technical differences comparing the proposed amendment request for both Dresden and Quad Cities to STS guidelines allowing for plant-specific parameters. The proposed changes are consistent to the safety analyses for both Dresden and Quad Cities Station and are therefore acceptable.
2. Proposed Action 1 is rewritten to more clearly define when the applicable chemistry condition does not need to be reported to the Commission. The proposed action does not alter the STS requirements.
3. The STS surveillance requirement to analyze pH at least once per 72 hours was not adopted in the proposed specifications. Accurate measurement of pH is very difficult unless the conductivity is greater than $1\mu\text{mhos/cm}$. Both Dresden and Quad Cities routinely operate with conductivity values less than $0.1\mu\text{mhos/cm}$. Therefore the requirement to routinely monitor pH is not adopted but the requirement for measuring pH when the conductivity value is outside the appropriate limit in the specification is retained. Thus, pH will be used as a diagnostic parameter for interpreting severe water chemistry transients at Dresden and Quad Cities.

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J. Specific Activity

1. Proposed Specification 3/4.6.J, "Specific Activity", is a rewrite of existing specifications. Proposed Actions and Surveillances are changed to match STS type format allowing for plant-specific parameters. The proposed format is similar to Perry Station's Technical Specifications (except for Operational Condition (4)).
2. The proposed applicability is consistent with the current specifications for Dresden and Quad Cities. Operational mode 4 is not included in the proposed specifications because there is no pressure or steam force to transport activity beyond the reactor vessel. This is consistent to the guidance provided in the Improved Technical Specifications. In addition, the proposed action requires the main steam line isolation valves be closed.
3. On-line monitoring capability at Dresden and Quad Cities Station eliminates the requirements to monitor for the average disintegration energy (as defined by STS Definition 1.11). These requirements are out-dated and are not contained within the current Dresden and Quad Cities Technical Specifications. Therefore, no changes are proposed to any safety analysis assumptions with the proposed modifications to STS guidelines.
4. Proposed Action 3 is modified from the STS by adopting the LaSalle specifications because the STS action is not applicable to Dresden and Quad Cities design. LaSalle has a similar design to Dresden and Quad Cities and therefore, the specifications are applicable. Dresden and Quad Cities proposed maintaining a 20% Power change action requirement (vs. 15% in STS) to be consistent to current plant requirements. This is consistent and/or more conservative than allowed by ITS which completely eliminate the action requirement. In addition, STS footnote '**' is only applied to initial plant startup programs and is not applicable to Dresden and Quad Cities Stations.

K. Pressure/Temperature Limits

1. Proposed Specification 3/4.6.K, "Pressure/Temperature Limits", is a rewrite of existing specifications. Proposed Actions and Surveillances are changed to match STS type format. Changes from STS are based upon the guidelines suggested by Generic Letter 91-01, "Removal of the Schedule for the Withdrawal of Reactor Vessel Material Specimens from the Technical Specifications." Proposed temperature values are based upon plant specific limits consistent with the safety analysis at Dresden and Quad Cities Stations.
2. Table 4.4.6.1.3-1 of STS is being deleted per the guidance given in GL 91-01. The changes are consistent to those found within the Fort Calhoun Technical Specifications. In addition, STS Section 4.4.6.1.3 (proposed Section 4.6.K.3) has

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been modified similar to the changes noted in the Fort Calhoun Technical Specifications.

3. Section 4.4.6.1.1 of STS has been modified to be consistent with LaSalle County's Technical Specifications. These changes are consistent to the safety analyses for both Dresden and Quad Cities Stations. Optional SR 4.6.1.1.b has not been adopted for Dresden and Quad Cities Stations.

L. Reactor Steam Dome

1. Proposed Specification 3/4.6.L, "Reactor Steam Dome", is a new specification. Proposed Actions and Surveillances are adopted to match STS type format allowing for plant-specific parameters.

M. Main Steam Line Isolation Valves

1. Proposed Specification 3/4.6.M, "Main Steam Line Isolation Valves", is a rewrite of existing specifications. Proposed Actions and Surveillances are changed to match STS type format allowing for plant-specific parameters.
2. TSUP Actions (STS a.1) have been slightly re-worded for clarity and to maintain consistency throughout the Technical Specifications. The technical requirements are identical to those found within STS guidelines.

N. Structural Integrity

1. Proposed Specification 3/4.6.N, "Structural Integrity", is a rewrite of existing specifications for Quad Cities but represents a new specification for Dresden. Proposed Actions and Surveillances are changed to match STS type format allowing for plant-specific parameters. Proposed Action 2 has been modified to eliminate redundancy in wording (isolate vs. isolate prior to 200 °F).
2. STS Action d has not been included for the proposed amendment due to the guidance provided in GL 87-09.

O. Shutdown Cooling/RHR - HOT SHUTDOWN

1. Proposed Specification 3/4.6.O "Shutdown Cooling (RHR for Quad Cities) - HOT SHUTDOWN," is a rewrite of existing specifications. Proposed Actions and Surveillances are changed to match STS type format for systems and applications applicable to both Dresden and Quad Cities Stations. The Shutdown Cooling systems in place at Dresden and Quad Cities Station cannot meet strict STS requirements due to design limitations. The proposed requirements ensure the minimum level of temperature control is maintained when applicable. The ability for taking credit for common heat exchangers and piping in the SDC mode of RHR is consistent to NUREG-1433 (Improved Technical Specifications).

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P. Shutdown Cooling/RHR - COLD SHUTDOWN

1. Proposed Specification 3/4.6.P, "Shutdown Cooling (RHR for Quad Cities) - COLD SHUTDOWN," is a rewrite of existing specifications. Proposed Actions and Surveillances are changed to match STS type format for systems and applications applicable to both Dresden and Quad Cities Stations. The Shutdown Cooling systems in place at Dresden and Quad Cities Station cannot meet strict STS requirements due to design limitations. The proposed requirements ensure the minimum level of temperature control is maintained when applicable. The ability for taking credit for common heat exchangers and piping in the SDC mode of RHR is consistent to NUREG-1433 (Improved Technical Specifications).

Q. Other Changes

1. The requirements for Snubbers (Sections 3/4.6.I within the current Technical Specifications for Dresden and Quad Cities Stations) has been moved to proposed Section 3/4.8 of TSUP to be consistent to STS format. Technical changes to the requirements for Snubbers will be discussed at the time of receipt of the proposed amendment request for Section 3/4.8. Changes to the Snubbers' requirements will be based upon STS and the guidelines presented in Generic Letter 90-09, "Alternative Requirements for Snubber Visual Inspection Intervals and Corrective Actions," as applied to Dresden and Quad Cities Stations.

Summary and Schedule

The proposed changes to both the Dresden and Quad Cities Station Technical Specifications have been reviewed and approved by the On-Site Review in accordance with controlled Station Procedures. Commonwealth Edison has reviewed these proposed amendments in accordance with 10 CFR 50.92(c) and determined that no significant hazards consideration exist. This evaluation is documented in Attachment 6. It is requested that the proposed amendment be approved no later than December 31, 1993.