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CECO

DRESDEN 2

PROPOSED CHANGE TO TECH SPECS RE TECH
SPECS UPGRADE PROGRAM

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ATTACHMENT 1

EXECUTIVE SUMMARY

Technical Specification 3/4.5

"EMERGENCY CORE COOLING SYSTEMS"

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 3/4.5, "EMERGENCY CORE COOLING SYSTEMS"

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 3/4.5 has been reordered and new titles have been added based on STS arrangements and nomenclature. Some sections have moved to the appropriate STS section. Additional requirements are added for the Isolation Condenser system at Dresden Station.

A. ECCS - Operating

Proposed Specification 3/4.5.A has been titled "ECCS - Operating" and is a rewrite of existing specifications. Proposed actions and surveillances are changed to match STS guidelines and format. The proposed changes for Quad Cities delete the requirements to demonstrate the operability of the opposite trains of ECCS systems when a single train of ECCS is made or found to be inoperable. These changes are consistent to those already present within Dresden's Technical Specifications.

Other significant changes are the allowance of ECCS inoperabilities without requiring a full complement of diesel generators or off-site power. These requirements are being more appropriately moved to proposed TSUP Section 3/4.9, "Auxiliary Electrical Systems."

B. ECCS - Shutdown

Proposed Specification 3/4.5.B, "ECCS - Shutdown", is a rewrite of existing specifications. Proposed Actions and Surveillances are changed to match STS guidelines and do not remove any major requirements from the current specifications. The proposed surveillances more explicitly define operability verifications to ensure the minimum levels of verifications necessary for operability demonstrations of ECCS during shutdown conditions.

C. Suppression Chamber

Proposed Specification 3/4.5.C, "Suppression Chamber", is a rewrite of existing specifications. The current requirements at Dresden Station (3.5.F) are consistent with STS guidelines. The current version of Quad Cities' specifications are delinquent and additional requirements are added to ensure compensatory actions are in place ensuring irradiated fuel has an adequate supply of cooling water supply when the suppression chamber must be made inoperable for repair or maintenance.

D. Reactor Core Isolation Cooling System (RCIC) (Quad Cities Only)

Proposed Specification 3/4.5.D, "Reactor Core Isolation Cooling System (RCIC)", is a rewrite of existing specifications. Proposed Actions and Surveillances are changed to match STS guidelines and format. There are no significant changes to the proposed requirements for Quad Cities Station.

E. Isolation Condenser (IC) (Dresden Only)

Proposed Specification 3/4.5.D, "Isolation Condenser (IC)", is a new section for Dresden Station. Proposed Actions and Surveillances are changed to match STS type format.

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DESCRIPTION OF CHANGES

Technical Specification 3/4.5

"EMERGENCY CORE COOLING SYSTEMS"

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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.

The proposed surveillances for ECCS are consistent to the guidelines proposed within STS. The requirements are more prescriptive ensuring greater reliability of ECCS and allow a better understanding of the proposed requirements. For Quad Cities, the requirements to demonstrate the opposite train of an ECCS system when one train is made or found to be inoperable is being deleted to be consistent to Dresden and to STS guidelines: The physical demonstration of the opposite train of equipment generally proves the operability of equipment. However, by physically operating such safety systems, the industry has shown that system reliability can be reduced by these unnecessary starts. Instead of physically demonstrating redundant equipment, to be consistent to both industry and STS standards, a non-physical verification of redundant required equipment is more appropriate. The proposed changes delete current requirements 4.5.A.2, 4.5.A.4, and 4.5.A.5 from Quad Cities' Technical Specifications

Description and Bases for the Proposed Changes

A. Section 3/4.5.A : ECCS - Operating

1. Proposed Section 3/4.5.A, "ECCS - Operating," incorporates the requirements of the STS. The Limiting Conditions for Operation (LCOs) proposed for both Dresden and Quad Cities directly incorporate all requirements from the STS as applicable to both sites. The current requirements from Sections 3.5.C.1 and 3.5.D.1 from Dresden and Quad Cities are maintained within the footnotes for the applicability section and are consistent to STS. The Dresden and Quad Cities Core Spray System (CS) System design consists of two subsystems with each subsystem

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comprised of one CS pump and an operable flow path from the suppression chamber.

2. Dresden and Quad Cities loss-of-coolant accident (LOCA) analyses use a 3 pump low pressure coolant injection (LPCI) subsystem for those transients where LPCI is the remaining ECCS function. As such, both Dresden and Quad Cities have a single LPCI subsystem where all four (4) pumps are required to be operable (vs. 2 per subsystem as described in STS) and several STS actions are not applicable to Dresden and Quad Cities. The guidance provided in STS is applicable to plants without LPCI loop-select features. Because Dresden and Quad Cities' plant design includes LPCI loop-select, STS Action 3.5.1.b.1 and 3.5.1.b.2 are not applicable.
3. Proposed Actions 4.a and 4.b of Section 3.5.A are adopted from the STS. Both Dresden and Quad Cities have five ADS valves but all of the transient analyses are performed assuming a minimum of four valves (Dresden applies MAPLHGR penalties with an ADS valve out of service). This philosophy is consistent with the standard specifications. Therefore, the actions are adopted in accordance with STS and are more conservative than current requirements.
4. The applicability for the ADS system is modified for Quad Cities by adopting the STS. Current specifications require the ADS system to be operable whenever reactor pressure is greater than 90 psig. The proposed specifications require the ADS system to be operable when reactor pressure is greater than 150 psig consistent with the requirements for the HPCI and RCIC systems and consistent with the assumed conditions within the safety analysis.
5. STS footnote '#' referring to Special Test Exceptions is not applicable to the existing Dresden and Quad Cities configuration. STS 3.10.6 is only applicable to initial plant startup programs.
6. Proposed Action 1.a of Section 3.5.A maintains the 7 day time clock in the event Core Spray becomes inoperable in accordance with STS. However, the proposed specification eliminates (current sections 3.5.A.2 for Dresden and Quad Cities) the restriction that ". . . the diesel generators required for operation of such components if no external source of power were available shall be operable." The requirements for alternative sources of A.C. electrical power are consolidated within proposed Section 3/4.9 and are consistent to STS. Proposed Action 1.a is conservatively modified to be consistent to the plant design for Dresden and Quad Cities. The proposed Action requires an entire LPCI subsystem to be operable as compared to STS which only specifies a single LPCI pump.
7. The design basis of LPCI necessitates the modification of the STS guidelines as compared to TSUP (system vs. subsystem, respectively).
8. STS actions 3.5.1.b.1 and 3.5.1.b.2 are not adopted because of the Dresden and Quad Cities requirement for 3 pump LPCI subsystem. The LPCI system at Dresden

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and Quad Cities is a split system with LPCI loop-select logic and a LPCI swing bus. The guidance provided in STS is applicable to plants without LPCI loop-select features. Because Dresden and Quad Cities' plant design includes LPCI loop-select, STS Action 3.5.1.b.1 and 3.5.1.b.2 are not applicable.

9. Proposed Actions 2.b and 2.c are adopted from the STS. The actions allow a 7 day allowed outage time for the LPCI subsystem provided both core spray subsystems are operable. If one or both core spray subsystems are inoperable in addition to the LPCI subsystem, the plant must be in hot shutdown in 12 hours and in cold shutdown within the next 24 hours. Because Dresden and Quad Cities normally require 3 LPCI pumps, STS Action 3.5.1.b.4 has been modified to apply the STS requirements to the Dresden and Quad Cities design and not completely incorporated into TSUP Action 2.c based upon the plant-specific design of Dresden and Quad Cities.

The current action requirements for Dresden (3.5.A.8) and Quad Cities (3.5.A.6) require the unit to be brought to Cold Shutdown within 24 hours. The proposed specifications (3.5.A, actions 1.c and 2.d) require the plant to be in Hot Shutdown in 12 hours and Cold Shutdown within the following 24 hours. These requirements conservatively increase the plant's margin of safety and are consistent to STS guidelines.

10. Action 5.b is maintained from current specifications 4.5.A.3 for HPCI. STS guidelines do not provide the appropriate guidance for compensatory actions for the Dresden and Quad Cities system design.
11. STS Actions related to LPCI header delta P instrumentation have not been adopted. The current plant requirements have been maintained as this instrumentation is not included in the Dresden and Quad Cities design.

Current Surveillance Requirement 4.5.A.1.e for Dresden and Quad Cities is being modified to be consistent to STS guidelines. Dresden and Quad Cities utilize different setpoints due to design differences in the systems. The current requirement to check daily the core spray header delta P instrumentation is being deleted. In addition, the current requirement to test every three months the core spray header delta P instrumentation is being deleted. The calibration frequency of the core spray header delta P instrumentation is being modified from every three months to every eighteen months to be consistent to STS guidelines. The proposed Surveillance Requirement (4.5.A.3.d) consists of a channel calibration and verification of the setpoint every 18 months.

12. STS SR's have been modified to be consistent to the design limitations in place at Dresden and Quad Cities. In all cases, the proposed requirements either maintain existing requirements or impose additional conservative limitations and are therefore acceptable.

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13. The Core Spray (CS) and LPCI keep-fill alarm instrumentation requirements from STS have been included in the proposed specifications (4.5.A.3). HPCI and RCIC (Quad) have not been included as these systems do not include keep-fill alarm instrumentation. The current requirements (Section 4.5.G.3) to maintain keep-fill capability for HPCI and RCIC have been included in the proposed specifications where appropriate.
14. STS SR 4.5.1.d.1 and 4.5.1.d.2.c have not been adopted as this requirement is not currently included in the Dresden and Quad Cities Technical Specifications. An accumulator backup alarm instrumentation system is not part of the current design for Dresden and Quad Cities.
15. Proposed Action 3 is a rewrite of existing specifications. Proposed actions and surveillances are changed to match STS guidelines and format and do not remove any significant requirements from the current specifications.
16. Proposed Action 5 of Section 3.5.A is adopted from the LaSalle specifications to provide guidance when the ECCS discharge line pressure alarm instrumentation for CS and LPCI becomes inoperable. The current STS do not provide any guidance for compensatory actions.
17. Footnote (d) is adopted from the STS and is only applicable to Quad Cities (Dresden has a separate Shutdown Cooling System).
18. Footnote (e) is adopted from recent Technical Specifications for Hope Creek and River Bend. The footnote is only applicable to Quad Cities and allows the LPCI system to be considered operable while performing the decay heat removal function if the system can be realigned to perform the LPCI function.

B. Section 3/4.5.B: ECCS - Shutdown

1. Current section 3.5.F.1 of both Dresden and Quad Cities' Technical Specifications is being deleted per the guidelines of STS. The current wording is ambiguous and does not define either an action or limiting condition for operation.
2. Current section 3.5.F.2 at Dresden Station is maintained as LCO 3.5.B. The proposed requirements for the specifications require a single LPCI pump for a LPCI loop and an operable flow path to maintain compliance for operability purposes. The current requirements require either of the following: two core spray pumps, or two LPCI pumps, or one core spray and one LPCI pump. The proposed changes will be incorporated as LCO 3.5.B and follow STS guidelines.
3. By incorporating the STS guidelines for 3/4.5.B, "ECCS - Shutdown," Quad Cities Station is adding additional requirements already fully incorporated within Dresden's Technical Specifications. For example, Section 3.5.F.2 of Dresden's current requirements will be incorporated into the proposed specifications (except the

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changes noted above). These same requirements are not in the current version of Quad Cities' specifications and conservatively assure ECCS capability during shutdown conditions for Quad Cities. Proposed Note (b) for Quad Cities has been added to the LCO to support Shutdown Cooling (SDC) valve alignment. This change is not applicable to the design at Dresden Station.

4. In proposed TSUP LCO 3.5.B, the minimum CST volume is stated within the provisions for both CS and LPCI because either system can take suction from the CST. The proposed ECCS shutdown provisions are consistent to STS (with the minor clarification to proposed 3.5.B.2.b.2) and are consistent to the design of the ECCS systems at Dresden and Quad Cities.
5. The proposed surveillance requirement 4.5.B is modified from the STS by allowing two exceptions due to design differences with the Dresden and Quad Cities plants. Proposed specification 4.5.B requires the surveillances of 4.5.A be met for the required ECCS equipment in accordance with the STS. But, the first exception is that the LPCI subsystem cross-tie valves do not need to be open as required by specification 4.5.A.1.b. One LPCI pump in each loop would satisfy the ECCS - Shutdown requirements and therefore the cross-tie valves may be closed. The second exception to specification 4.5.A is that only one LPCI pump is required to provide make-up to the reactor vessel in accordance with STS, but specification 4.5.A.2.b requires flow rate testing of multiple pumps. Therefore, an individual LPCI pump flow rate surveillance is provided in specification 4.5.B.
6. Proposed Note (a) for Dresden [Note (b) for Quad Cities] of the applicability section are adopted from the STS. The proposed changes are consistent to STS guidelines and do not reduce the margin of safety for the operations described within the specifications.

C. Section 3/4.5.C: Suppression Chamber

1. This item describes the rewrite of the current specifications for the Suppression Chamber into proposed Specification 3/4.5.C, "Suppression Chamber." The Limiting Conditions for Operation (LCOs) proposed for both Dresden and Quad Cities directly incorporate all requirements from the STS as applicable to both sites.
2. Proposed LCOs 3.5.C.1 and 3.5.C.2 are consistent to the current requirements of Sections 3.5.F.6 and 3.5.F.7 for Dresden and 3.5.F.4 for Quad Cities Stations. Current 3.5.F.6 for Dresden Station is consistent to the Applicability sections for the proposed Technical Specifications. These requirements are new for Quad Cities Station and are consistent to STS guidelines. These additional requirements specify "The suppression chamber is not required to be operable provided that the reactor vessel head is removed, the cavity is flooded or being flooded from the suppression pool, the spent fuel pool gates are removed when the cavity is flooded, and the water level is maintained within the limits" The additional requirements ensure appropriate compensatory actions providing assurance that irradiated fuel has an

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adequate cooling water supply are in place during shutdown conditions when the suppression chamber may be out-of-service for maintenance or other refuel outage activities.

3. The proposed specifications revise the minimum acceptable volume of water contained within the condensate storage tanks from 230,000 gallons to 140,000 gallons in accordance with STS guidelines. The original volume of 230,000 gallons was implemented in both Dresden and Quad Cities Technical Specifications based on the availability of 700,000 gallons of available water when the refuel cavity is flooded and an additional 140,000 gallons available for core spray in the condensate storage tank. The summation of the two volumes was equivalent to the suppression chamber volume required during power operation. The STS require 50,000 gallons be made available to the core spray system from the condensate storage tank. Because the core spray suction line becomes uncovered at the 90,000 gallon level, the minimum required volume contained within the condensate storage tank is 140,000 gallons.
 4. Proposed LCO 3.5.C.2.d is modified from the STS because both Dresden and Quad Cities LPCI systems can take a suction from the bottom of the condensate storage tank. Therefore, either LPCI or core spray will provide the function of make-up water to the reactor vessel when the suppression chamber is below the require level.
 5. All Surveillance Requirements proposed in Section 4.5.C are additional requirements not currently required for both Dresden and Quad Cities Stations. The appropriate Action statements ensure timely and appropriate checks of suppression chamber operability are maintained to be consistent to the Safety Analysis for Dresden and Quad Cities Stations. The proposed Surveillance Requirements are consistent to STS guidelines. In some cases, minor deviations from STS guidelines concerning water level as opposed to water volume have been proposed. Water volume is redundant and immeasurable - water level is a quantifiable value (instrumentation). The proposed changes to STS are administrative in nature as the requirements have been modified for clarity and consistency to the STS Applicability conditions.
 6. STS SR 4.5.3.1.b has been incorporated into the proposed TSUP SR 4.5.C.2.a for consistency with the allowable modes of operation. The 12 hour surveillance frequency is required when the suppression chamber level is allowed to drop to a lower level. The lower level is only permissible in operational modes 4 or 5.
 7. STS SR 4.5.3.2 has been modified for clarity. Proposed TSUP SR 4.5.C.2 is less ambiguous and is consistent to the intent of the STS guidelines.
- D. **Section 3/4.5.D: Reactor Core Isolation Cooling System (Quad Cities Only)**
1. This item describes the rewrite of the current specifications for the Reactor Core Isolation Cooling System into proposed Specification 3/4.5.D, "Reactor Core

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Isolation Cooling System," for Quad Cities Station. This specification is not applicable for Dresden Station as Dresden Station does not contain a RCIC system. The Limiting Conditions for Operation (LCOs) proposed for Quad Cities directly incorporate all requirements from the STS as applicable to Quad Cities. Current Sections 3.5.E.1 and 3.5.E.2 are fully incorporated with proposed LCO 3.5.D. Current Sections 3.5.E.3 and 3.5.E.4 at Quad Cities fully incorporate the Action statement for the proposed specifications.

2. As described in the Bases, RCIC supplies continuous makeup water to the reactor core when the feedwater system is isolated from the turbine and when the feedwater system is unavailable. The pumping capacity of RCIC is sufficient to maintain water level above the core without any other water system in operation. RCIC is required to be operable whenever reactor pressure is greater than 150 psig. The proposed requirements of the current specifications are maintained within proposed Section 3/4.5.D for Quad Cities.
3. Current Surveillance Requirements and Actions for 4.5.G at Quad Cities are incorporated into the proposed specifications 4.5.D.1.a. The proposed surveillances explicitly ensure that RCIC is properly vented and that the system is properly filled with water. The current requirements specified within 4.5.G.2 are no longer explicitly required per the guidelines of STS. These requirements are redundant to those specified in current 4.5.G.1 and are incorporated into the proposed LCO for RCIC that requires RCIC to be operable with an operable flow path capable of taking suction from the suppression pool and transferring the water to the reactor pressure vessel. Implicit within the LCO is the current requirements specified within 4.5.G.2.
4. The surveillances specified in current 4.5.E.1-5 are incorporated into proposed 4.5.D.1.b, 4.5.D.1.c, 4.5.D.2, and 4.5.D.3. These changes are consistent to STS guidelines and do not adversely effect any assumptions made in Quad Cities Safety Analysis that require the safe and reliable operation of the RCIC system. The STS guidelines/surveillances for RCIC are clearer, more prescriptive; thus ensuring the reliability of RCIC.

D. Section 3/4.5.D: Isolation Condenser (Dresden Only)

1. This section describes the creation of specifications for the Isolation Condenser as proposed Specification 3/4.5.D, "Isolation Condenser" for Dresden Station only. This specification is not applicable for Quad Cities Station as Quad Cities Station does not contain an Isolation Condenser system. The Limiting Conditions for Operation (LCOs) proposed for Dresden are consistent to STS type and format and add additional Technical Specification LCO's, Action statements, and Surveillance Requirements. The proposed changes do not adversely effect any assumptions made in Dresden Station's Safety Analysis.

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2. Current Surveillance Requirements 4.5.E.1.d which requires calibration of the Isolation Condenser radiation monitor quarterly is not being retained. The monitor provides an alarm function only and is not required to mitigate any design bases transients or accidents. Calibration Surveillances and availability of the vent radiation monitor will be administratively controlled.

E. Other Changes Within Section 3/4.5

1. Section 3/4.5.H for Quad Cities and 3/4.5.M for Dresden, "Condensate Pump Room Flood Protection," of the current Technical Specifications are being deleted. These changes are consistent to STS guidelines. Flood protection measures for these systems will administratively/procedurally controlled outside of the Technical Specifications for Dresden and Quad Cities.
2. Section 3/4.5.I for Quad Cities and 3/4.5.I for Dresden, "Average Planar LHGR," is being moved in its entirety to proposed TSUP Section 3/4.11.A. These changes are consistent to STS guidelines and are described in proposed specifications for Section 3/4.11.
3. Section 3/4.5.J for Quad Cities and 3/4.5.J for Dresden, "Local LHGR," is being moved in its entirety to proposed TSUP Section 3/4.11.D. These changes are consistent to STS guidelines and are described in proposed specifications for Section 3/4.11.
4. Section 3/4.5.K for Quad Cities and 3/4.5.L for Dresden, "Minimum Critical Power Ratio (MCPR)," is being moved in its entirety to proposed TSUP Section 3/4.11.C. These changes are consistent to STS guidelines and are described in proposed specifications for Section 3/4.11.
5. Section 3/4.5.K for Dresden, "Local Transient LHGR," is being moved in its entirety to proposed TSUP Section 3/4.11.E. These changes are consistent to STS guidelines and are described in proposed specifications for Section 3/4.11.
6. Proposed Action 2.a of Section 3.5.A maintains the current time clock of 30 days in the event that one LPCI pump is made or found inoperable. The proposed specification eliminates (current sections 3.5.A.4 and 3.5.A.5 for Dresden and 3.5.A.4 and 3.5.A.5 for Quad Cities) the restriction that ". . . the diesel generators required for operation of such components if no external source of power were available shall be operable." The requirements for alternative sources of A.C. electrical power are consolidated within proposed Section 3/4.9 and are consistent to STS requirements.
7. The current requirements of 3.5.A.6 are being moved to TSUP Section 3.7.