Commonwealth Edison
1400 Opus Place
Downers Grove, Illinois 60515

10 CFR 50.90

December 15, 1993

Dr. Thomas E. Murley, Director
Office of Nuclear Reactor Regulation
U.S. 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
Application for Amendment to Facility Operating Licenses
DPR-19, DPR-25, DPR-29, and DPR-30, Appendix A, Technical
Specifications for Technical Specifications Upgrade Program
NRC Docket Nos. 50-237, 50-249, 50-254, and 50-265

References: (a) R. Stols memo to T. Murley, dated July 29, 1991.

(b) J. Schrage memo to T. Murley, dated December 15, 1993
Withdrawal of Quad Cities Technical Specification Upgrade
Section 5.0.

Dear Dr. Murley:

In 1991, Quad Cities initiated a formal program to enhance the Station's performance in various aspects of plant operation. Necessary improvements to the Technical Specifications were identified as one of the Station top priority issues. In support of that effort, Quad Cities submitted revised Technical Specifications to the NRC during the course of the year (Reference (a) included Quad Cities' submittal for Section 5.0). To enhance the Quad Cities effort and to improve the Technical Specifications at Dresden Station, a combined, two station effort has been initiated to revise the Dresden Technical Specifications and improve the Quad Cities submittals. The attached submittals for Quad Cities replaces the original withdrawn submittal (Reference (b)) in their entirety.

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As stated previously, one of the principal improvements to the Technical Specification being proposed by this project is the combination of the two units into one Technical Specification for each station. During the development of this upgrade project, the technical differences between the units have been identified and resolved with the improvement package submittals to aid in your staff's review. Details of the program are provided in the Executive Summary of the amendment request. The program has been outlined and discussed with members of the NRR staff.

Pursuant to 10 CFR 50.90, Commonwealth Edison proposes to amend Appendix A, Technical Specification to Facility Operating Licenses DPR-19, DPR-25, DPR-29, and DPR-30. The proposed amendment reflects Commonwealth Edison's efforts to upgrade existing Technical Specifications Section 5.0, "Design Features". An overall description of the proposed amendment is also included in the Executive Summary.

The proposed amendment request for each Technical Specification section is provided as follows:

1. An Executive Summary of the Technical Specification Upgrade Program and the proposed amendment;

2. A description of the proposed amendment;

3. The proposed Technical Specification pages with the requested changes;

4. The existing Technical Specification pages for DPR-19 and DPR-25 (Dresden) and DPR-29 and DPR-30 (Quad Cities), are being deleted in their entirety. To reduce the administrative requirements to process this amendment package, a list of the deleted pages for Dresden Units 2 and 3 and Quad Cities Units 1 and 2 are provided; the current versions of existing pages will be provided separately for your staff's information and for comparative purposes.

5. The technical differences between the existing Dresden Unit 2 and Unit 3 Technical Specifications and the technical differences between the existing Quad Cities Unit 1 and Unit 2 Technical Specifications.

6. Commonwealth Edison's evaluation pursuant to 10 CFR 50.92(c) and 10 CFR 51.21;

The proposed amendments have been approved by Commonwealth Edison's On-Site and Off-Site Review in accordance with Company procedures.

The Technical Specification Upgrade Program (TSUP) proposes changes to each section of the existing Technical Specifications. As such, Commonwealth Edison requests that the proposed amendments be approved as submitted but to become effective upon completion of the entire project. It is requested that the proposed changes to Section 5.0 be approved prior to March 31, 1993 for both Dresden and Quad Cities.

To the best of my knowledge and belief, the statements contained are true and correct. In some respects, these statements are not based on my personal knowledge but obtained information furnished by other Commonwealth Edison 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.

If there are any comments or questions concerning this submittal, please direct them to this office.

State of Ill., County of DuPage
Signed before me on this 15th day
of December, 1993 by [illegible]
Notary Public [illegible]

Sincerely,

Peter L. Piet
Nuclear Licensing Administrator

Attachments:
1. Executive Summary
2. Description of the Proposed Amendment
3. The proposed Technical Specification Pages
4. Listing of Deleted Technical Specification Pages
5. Technical Difference Matrix
6. Significant Hazards Evaluation and Environmental Assessment

cc: J.B. Martin, Regional Administrator - RIII
J.F. Stang, Project Manager - Dresden
C.P. Patel, Project Manager - Quad Cities
M.N. Leach, Senior Resident Inspector - Dresden
T.E. Taylor, Senior Resident Inspector - Quad Cities
Office of Nuclear Facility Safety - IDNS

" OFFICIAL SEAL "
SANDRA C. LARA
NOTARY PUBLIC, STATE OF ILLINOIS
MY COMMISSION EXPIRES 6/25/94

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ATTACHMENT 1

EXECUTIVE SUMMARY

Technical Specification 5.0

"DESIGN FEATURES"

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 Specification (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. As a result of the inconsistencies in earlier 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 of 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 is identified as a site 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 5.0, "DESIGN FEATURES"

The current Dresden and Quad Cities Technical Specifications for design features contain several items which were determined to not be appropriate for this section when the Standard Technical Specifications were developed. The proposed amendment will delete those items which are controlled sufficiently by other mechanisms such as 10CFR 50.59 and upgrade the other sections to the format and content of STS.

ATTACHMENT 2

DESCRIPTION OF CHANGES

Technical Specification 5.0

"DESIGN FEATURES"

ATTACHMENT 2

DESCRIPTION OF PROPOSED AMENDMENT

The changes proposed in this amendment request are made to provide the necessary controls of important design features, and to incorporate improvements from the Standard Technical Specifications (STS).

Section 5.1 currently contains a detailed description of the site location and size. However, the description is not utilized in the safety related calculations. The exclusion area, the low population zone (as determined in accordance with 10CFR Part 100) and the site boundary for gaseous and liquid effluents (as recommended in Generic Letter 89-01) are utilized in determining compliance with dose restrictions for the general public as determined in accordance with 10CFR Part 20. Therefore, these site features are proposed to be described in the new Section 5.1 to replace the current location and size descriptions.

Section 5.2 is proposed to incorporate the containment design provisions determined necessary by STS to assure that the containment response analyses assumptions remain valid. Current Section 5.4 provides more encompassing general design parameters by reference to the applicable sections of the Final Safety Analysis Report (FSAR). Some of these parameters are not important to the containment response to a design basis accident and should not require prior NRC approval for modification. By identifying only the specific features such as configuration, free air and water volumes, design pressure and temperature and the secondary containment free air volume, revisions to other parameters can be adequately controlled by 10CFR 50.59.

Section 5.3 is proposed to incorporate the reactor core design provisions determined necessary by STS to assure that the reactor physical content and arrangement does not change. Current Section 5.2 provides very similar details, however, Generic Letter 90-02 Supplement 1 is incorporated in Section 5.3.A to allow limited substitutions in accordance with NRC approved applications.

Section 5.4 is proposed to incorporate the reactor coolant system specific design provisions of pressure, temperature and volume. These were determined necessary during the development of STS to assure the safety analyses assumptions remain valid. Current Section 5.3 provides only a general reference to similar, more encompassing general design parameters listed in the applicable sections of the Final Safety Analysis Report. However, the current specification is for the reactor vessel only, not the complete reactor coolant system. Some of the parameters listed in the FSAR reference are not important in the analysis of a design basis accident and should not require prior NRC approval for revision. By identifying the specific features of design pressure, temperature and volume, revisions to other parameters can be adequately controlled by 10CFR 50.59.

Section 5.5 is proposed to identify the location of the meteorological tower which provides input to dose projections that may be made in a post accident environment. This location is currently not identified in the Technical Specifications but is proposed to be included in accordance with the STS content and format.

ATTACHMENT 2

Section 5.6 is proposed to incorporate the fuel storage design provisions determined necessary by STS to assure that the spent fuel is appropriately stored and cooled. Current Section 5.5 provides similar design parameters which are modified as necessary to include the information on criticality, drainage and storage of spent fuel. STS requires design limits for storage of new fuel for the initial core loading be incorporated into the Technical Specifications. Since both Dresden and Quad Cities have already operated for many years, the limits are not incorporated within the proposed specifications but are retained in the FSAR.

STS Section 5.7, Component Cyclic or Transient Limit, was not adopted in the proposed specification. Currently both Dresden and Quad Cities control the thermal cycle limits in the FSAR. Both stations recently performed revised thermal cycle predictions based on thermal cycle experience since plant startup. General Electric performed an analysis to determine the usage factors based on the 40 year predictions. However, the numbers were not optimized and therefore, could be re-evaluated for a greater number of allowable cycles. Thus, it is proposed that the thermal cycles be retained in the FSAR and not incorporated into the Technical Specifications. This change is consistent to the requirements outlined in the BWR Improved Standard Technical Specifications.

Current Section 5.6 which contains a discussion of seismic design is proposed to be deleted. This design parameter is considered to be adequately controlled by design change procedures in accordance with 10CFR 50.59 and is not included in the proposed Technical Specifications.