c. No activity is being performed which can reduce the shutdown margin below that specified in Specification 3.3.A.

d. The fuel cask or irradiated fuel is not being moved in the reactor building.

2. The doors of the core spray and RHR pump compartments shall be closed at all times except during passage in order to consider the core spray system and LPCI mode of the RHR system operable.

3. If Specification 3.7.C.1 cannot be met, procedures shall be initiated to establish conditions listed in Specifications 3.7.C.1 a through d.

D. Primary Containment Isolation Valves

~~1. During reactor power operating conditions, all isolation valves listed in Table 3.7-1 and all instrument line flow check valves which contact the primary coolant system shall be operable except as specified in Specification 3.7.D.2.~~

INSERT A

c. Secondary containment capability to maintain an average 1/4 inch of water vacuum under calm wind ($2<\bar{u}<5$ mph) conditions with a filter train flow rate of not more than 4000 cfm shall be demonstrated at each refueling outage prior to refueling.

2. Whenever the LPCI mode of the RHR and core spray subsystems are required to be operable, the doors of the core spray and RHR pump compartments shall be verified to be closed weekly.

D. Primary Containment Isolation Valves

1. The primary containment isolation valves surveillance shall be performed as follows:

a. At least once per operating cycle the operable isolation valves that are power operated and automatically initiated shall be tested for simulated automatic initiation and closure times.

b. At least once per operating cycle the instrument line flow check valves shall be tested for proper operation.

c. At least once per quarter:

1) All normally open power operated isolation valves (except for the main steamline power-operated isolation valves) shall be fully closed and reopened.

2) The main steamline isolation valves (one at a time) shall be verified for closure time.

INSERT B

2. In the event any isolation valve specified in Table 3.7-1 becomes inoperable, reactor power operation may continue provided at least one valve in each line having an inoperable valve is in the mode corresponding to the isolated condition.

3. If Specifications 3.7.D.1 and 3.7.D.2 cannot be met, an orderly shutdown shall be initiated and the reactor shall be in the cold shutdown condition within 24 hours.

2. When an isolation valve listed in Table 3.7-1 is inoperable, the position of at least one other valve in each line having an inoperable valve shall be recorded daily.

INSERT C

Insert A

1. During reactor power operating conditions, all isolation valves listed in Table 3.7-1, all instrument line flow check valves which contact the primary coolant system and all reference leg backfill check valves shall be operable except as specified in Specification 3.7.D.2.

Insert B

2. In the event any isolation valve specified in Table 3.7-1 or any reference leg backfill check valve becomes inoperable, reactor power operation may continue provided at least one valve in each line having an inoperable valve is in the mode corresponding to the isolated condition.

Insert C

2. When an isolation valve listed in Table 3.7-1 or a reference leg backfill check valve is inoperable, the position of at least one other valve in each line having an inoperable valve shall be recorded daily.

b. The reactor water temperature is below 212°F and the reactor coolant systems are vented.

c. No activity is being performed which can reduce the shutdown margin below that specified in Specification 3.3.A.

d. The fuel cask or irradiated fuel is not being moved in the reactor building.

2. The doors of the core spray and RHR pump compartments shall be closed at all times except during passage in order to consider the core spray system and LPCI mode of the RHR system operable.

3. If Specification 3.7.C.1 cannot be met, procedures shall be initiated to establish conditions listed in Specifications 3.7.C.1 a through d.

D. Primary Containment Isolation Valves

1. During reactor power operating conditions, all isolation valves listed in Table 3.7-1, all instrument line flow check valves which contact the primary coolant system and all reference leg backfill check valves shall be operable except as specified in Specification 3.7.D.2.

b. Additional tests shall be performed during the first operating cycle under an adequate number of different environmental wind conditions to enable valid extrapolation of the test results.

c. Secondary containment capability to maintain an average 1/4 inch of water vacuum under calm wind ($2 < \bar{u} < 5$ mph) conditions with a filter train flow rate of not more than 4000 cfm shall be demonstrated at each refueling outage prior to refueling.

2. Whenever the LPCI mode of the RHR and core spray subsystems are required to be operable, the doors of the core spray and RHR pump compartments shall be verified to be closed weekly.

D. Primary Containment Isolation Valves

1. The primary containment isolation valves surveillance shall be performed as follows:

a. At least once per operating cycle the operable isolation valves that are power operated and automatically initiated shall be tested for simulated automatic initiation and closure times.

2. In the event any isolation valve specified in Table 3.7-1 or any reference leg backfill check valve becomes inoperable, reactor power operation may continue provided at least one valve in each line having an inoperable valve is in the mode corresponding to the isolated condition.

3. If Specifications 3.7.D.1 and 3.7.D.2 cannot be met, an orderly shutdown shall be initiated and the reactor shall be in the cold shutdown condition within 24 hours.

4. The temperature of the main steamline air pilot valves shall be less than 170°F except as specified in Specifications 3.7.D.5 and 3.7.D.6 below.

5. From and after the date that the temperature of any main steamline air pilot valve is found to be greater than 170°F, reactor operation is permissible only during the succeeding 7 days unless the temperature of such valve is sooner reduced to less than 170°F provided the main steamline isolation valves are operable.

6. If Specification 3.7.D.5 cannot be met, the main steamline isolation valve shall be considered inoperable and action taken in accordance with Specification 3.7.D.2.

b. At least once per operating cycle the instrument line flow check valves shall be tested for proper operation.

c. At least once per quarter:

(1) All normally open power operated isolation valves (except for the main steamline power-operated isolation valves) shall be fully closed and reopened.

(2) The main steamline isolation valves (one at a time) shall be verified for closure time.

2. When an isolation valve listed in Table 3.7-1 or a reference leg backfill check valve is inoperable, the position of at least one other valve in each line having an inoperable valve shall be recorded daily.

3.7 LIMITING CONDITION FOR OPERATION (Cont'd.)

d. The fuel cask or irradiated fuel is not being moved in the reactor building.

2. If Specification 3.7.C.1 cannot be met, restore Secondary Containment Integrity within 4 hours or be in at least Hot Shutdown within the next 12 hours and in Cold Shutdown within the following 24 hours and establish the conditions listed in Specification 3.7.C.1.a through d.

D. Primary Containment Isolation Valves

~~1. During reactor power operating conditions, all primary containment isolation valves and all instrument line flow check valves shall be operable except as specified in 3.7.D.2.~~

INSERT D

4.7 SURVEILLANCE REQUIREMENTS (Cont'd.)

D. Primary Containment Isolation Valves

1. The primary containment isolation valves surveillance shall be performed as follows:

a. At least once per operating cycle the operable primary containment isolation valves that are power operated and automatically initiated shall be tested for simulated automatic initiation and closure times.

3.7 LIMITING CONDITION FOR OPERATION (Cont'd.)

INSERT E

2. In the event any primary containment isolation valve becomes inoperable, reactor power operation may continue provided at least one valve in

4.7 SURVEILLANCE REQUIREMENTS (Cont'd.)

b. At least once per operating cycle the instrument line flow check valves shall be tested for proper operation.

c. At least once per quarter:

(1) All normally open power-operated isolation valves (except for the main steam line power-operated isolation valves) shall be fully closed and reopened.

(2) With the reactor power less than 50% of rated, trip main steam isolation valves (one at a time) and verify closure time.

d. At least twice per week the main steamline power-operated isolation valves shall be exercised by partial closure and subsequent reopening.

INSERT F

2. Whenever a primary containment isolation valve is inoperable, the position of at least one other valve in each line having an inoperable valve shall be recorded daily.

3.7 LIMITING CONDITION FOR OPERATION (Cont'd.)

~~each line having an inoperable valve is in the mode corresponding to the isolated condition.~~

3. If Specification 3.7.D.1 and 3.7.D.2 cannot be met, an orderly shutdown shall be initiated and the reactor shall be in the Cold Shutdown condition within 24 hours except for the Recirculation Loop Sample valves and the Drywell Air Sampling System valves which can be reopened after isolation for sampling.

4. The temperature of the main steamline air pilot valves shall be less than 170°F except as specified in 3.7.D.5 below.

5. From and after the date that the temperature of any main steamline air pilot valve is found to be greater than 170°F, reactor operation is permissible only during the succeeding seven days unless the temperature of such valve is sooner reduced to less than 170°F, provided the main steamline isolation valves are operable.

4.7 SURVEILLANCE REQUIREMENTS (Cont'd.)

3. The temperature of the main steamline air pilot valves shall be recorded daily.

4. When it is determined that the temperature of any main steamline air pilot valve is greater than 170°F, the main steamline isolation valves shall be demonstrated to be operable immediately and daily thereafter. The demonstration of operability shall be according to Specification 4.7.D.1.d.

3.7 LIMITING CONDITION FOR OPERATION (Cont'd.)

d. The fuel cask or irradiated fuel is not being moved in the reactor building.

2. If Specification 3.7.C.1 cannot be met, restore Secondary Containment Integrity within 4 hours or be in at least Hot Shutdown within the next 12 hours and in Cold Shutdown within the following 24 hours and establish the conditions listed in Specification 3.7.C.1.a through d.

D. Primary Containment Isolation Valves

~~1. During reactor power operating conditions, all primary containment isolation valves and all instrument line flow check valves shall be operable except as specified in 3.7.D.2.~~

INSERT D

4.7 SURVEILLANCE REQUIREMENTS (Cont'd.)

D. Primary Containment Isolation Valves

1. The primary containment isolation valves surveillance shall be performed as follows:

a. At least once per operating cycle the operable primary containment isolation valves that are power operated and automatically initiated shall be tested for simulated automatic initiation and closure times.

b. At least once per operating cycle the instrument line flow check valves shall be tested for proper operation.

3.7 LIMITING CONDITION FOR OPERATION (Cont'd.)

INSERT E

2. ~~In the event any primary containment isolation valve becomes inoperable, reactor power operation may continue provided at least one valve in each line having an inoperable valve is in the mode corresponding to the isolated condition.~~

4.7 SURVEILLANCE REQUIREMENTS (Cont'd.)

c. At least once per quarter:

(1) All normally open power-operated isolation valves (except for the main steam line power-operated isolation valves) shall be fully closed and reopened.

(2) With the reactor power less than 50% of rated, trip main steam isolation valves (one at a time) and verify closure time.

d. At least twice per week the main steam-line power-operated isolation valves shall be exercised by partial closure and subsequent reopening.

2. ~~Whenever a primary containment isolation valve is inoperable, the position of at least one other valve in each line having an inoperable valve shall be recorded daily.~~

INSERT F

Insert D

1. During reactor power operating conditions, all primary containment isolation valves, all instrument line excess flow check valves, and all reference leg backfill check valves shall be operable except as specified in 3.7.D.2.

Insert E

2. In the event any primary containment isolation valve or any reference leg backfill check valve becomes inoperable, reactor power operation may continue provided at least one valve in each line having an inoperable valve is in the mode corresponding to the isolated condition.

Insert F

2. Whenever a primary containment isolation valve or any reference leg backfill check valve is inoperable, the position of at least one other valve in each line having an inoperable valve shall be recorded daily.

ATTACHMENT D
SIGNIFICANT HAZARDS CONSIDERATION

Commonwealth Edison has evaluated the proposed License Amendment and determined that it does not represent a significant hazards consideration. Based on the criteria for defining a significant hazards consideration established in 10 CFR 50.92, operation of Dresden Station Units 2 and 3 and Quad Cities Station Units 1 and 2 in accordance with the proposed amendment will not:

Involve a significant increase in the probability or consequences of an accident previously evaluated because:

The proposed license amendment adds the reference leg backfill check valves to the Technical Specifications. As such, the proposed amendment does not change the probability nor does it change the consequences of any previously evaluated accident for Dresden and Quad Cities Stations.

The proposed modifications (and proposed Technical Specification amendments) add reference leg backfill instrument lines and check valves to the reactor vessel level instrumentation. The proposed modifications will eliminate the phenomenon described in IEB 93-03 (dissolved gases in the RVLIS piping may produce uncertainties in the level instrumentation during RPV depressurization) by providing degassed Control Rod Drive (CRD) water to the RVLIS reference leg piping. The proposed design ensures that a continuous column of water, free of non-condensible gases is maintained in the RVLIS reference leg piping. As such, the proposed modifications do not affect any accident precursors or initiators. Therefore the proposed modifications for the reference leg backfill instrument lines do not increase the probability of any previously evaluated accidents for Dresden Station and Quad Cities Station.

The proposed plant modifications for the reference leg backfill check valves will not increase the radiological consequences of any previously evaluated accident. The radiological impact from a reference leg backfill instrument line break is bounded by Dresden's and Quad Cities' Instrument Line Break analysis (UFSAR Section 15.6.2). Therefore, the proposed plant changes will not increase the consequences of any previously evaluated accident.

Create the possibility of a new or different kind of accident from any accident previously evaluated because:

The proposed modification connects the non-safety-related CRD system to each safety-related division of RPV instrumentation and Feedwater Level Control System. The backfill check valves will eliminate the potential for reference leg leakage if CRD piping integrity is lost. These check valves are classified as safety-related and will be maintained and controlled such that overall plant safety is maintained. The addition of the reference leg backfill check valves to the Technical Specifications does not create the possibility of a new or different kind of accident for Dresden Station or Quad Cities Station.

Involve a significant reduction in the margin of safety because:

Primary containment integrity is not compromised by the addition of a pair of check valves that provide isolation for the reference leg backfill lines. These valves have been demonstrated to meet the intent of the criteria specified in General Design Criterion (GDC) 55. The maintenance and control applied toward all the reference leg backfill check valves ensures that overall plant safety is maintained. Therefore, the addition of the reference leg backfill valves to Technical Specification 3.7.D.1 and 3.7.D.2 does not reduce the margin of safety for Dresden Station or Quad Cities Station.

Guidance has been provided in "Final Procedures and Standards on No Significant Hazards Considerations," Final Rule, 51 FR 7744, for the application of standards to license change requests for determination of the existence of significant hazards consideration. This document provides examples of amendments which are not considered likely to involve significant hazards consideration. New primary containment isolation valves are being added to Technical Specification 3.7.D.1 and 3.7.D.2 to ensure proper maintenance and testing of the new valves, thus ensuring primary containment integrity is maintained. The proposed modification design most closely fits an example of a change which does not result in any increase in the probability of an accident but may increase the consequences of a previously evaluated accident as well as insignificantly reduce the margin of safety, but where the post modification system configuration of the change is clearly within all acceptable criteria with respect to the system or component specified in Standard Review Plan Section 6.2.4.

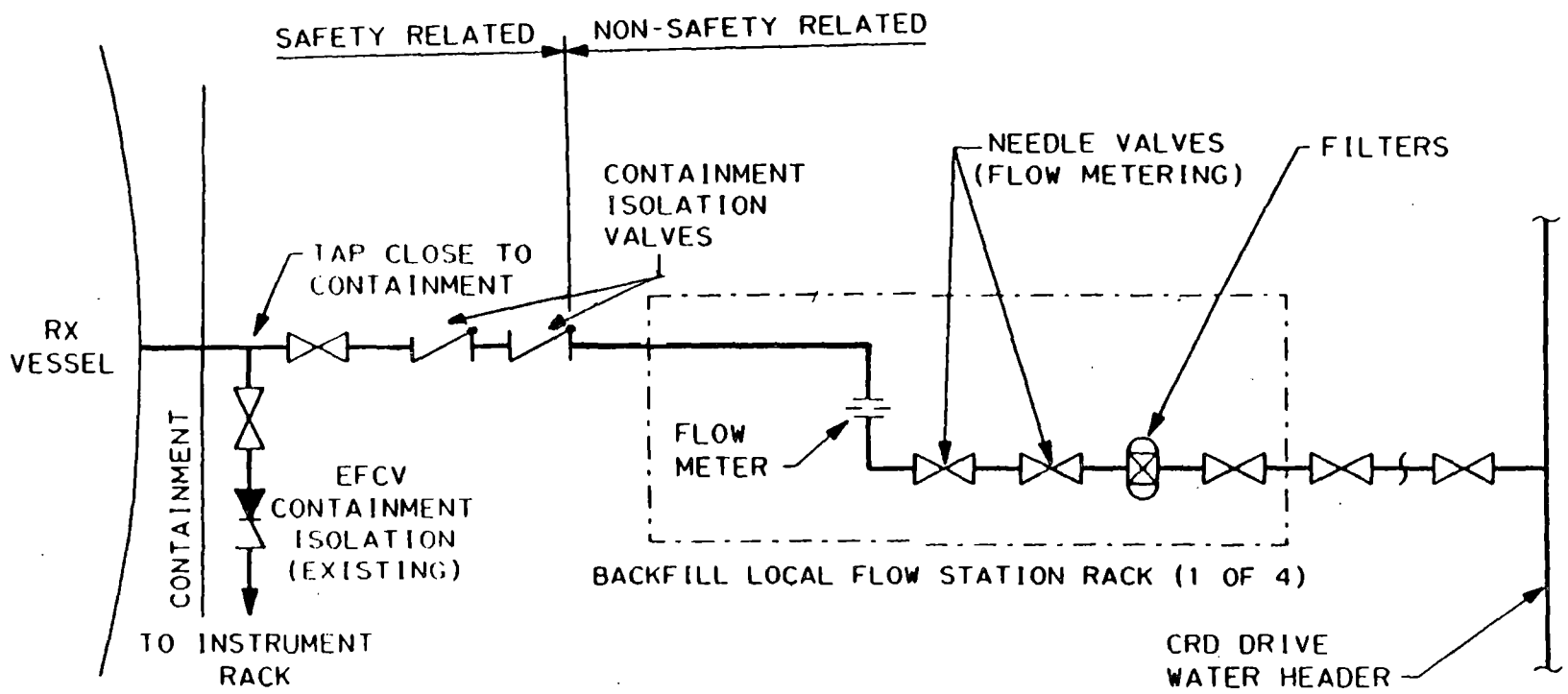
This proposed amendment does not involve a significant relaxation of the criteria used to establish safety limits, a significant relaxation of the bases for the limiting safety system settings, or a significant relaxation of the bases for the limiting conditions for operations. Therefore, based on the guidance provided in the Federal Register and the criteria established in 10 CFR 50.92(c), the proposed change does not constitute a significant hazards consideration.

ATTACHMENT E
ENVIRONMENTAL ASSESSMENT STATEMENT APPLICABILITY REVIEW

Commonwealth Edison has evaluated the proposed amendment against the criteria for the identification of licensing and regulatory actions requiring environmental assessment in accordance with 10 CFR 51.21. It has been determined that the proposed changes meet the criteria for categorical exclusion as provided for under 10 CFR 51.22(c)(9). This conclusion has been determined because the changes required do not pose a significant hazards consideration and do not involve a significant increase in the amounts, and no significant changes in the types, of any effluents that may be released off-site. Additionally, this request does not involve a significant increase in individual or cumulative occupational radiation exposure.

FIGURE 1

DRESDEN STATION UNITS 2 & 3
QUAD CITIES STATION UNITS 1 & 2
BACKFILL MODIFICATION



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