February 22, 1995

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SUBJECT: REQUEST FOR ADDITIONAL INFORMATION CONCERNING THE TECHNICAL SPECIFICATION UPGRADE PROGRAM AT DRESDEN AND QUAD CITIES NUCLEAR POWER PLANTS (TAC NO. M86774)

Dear Mr. Farrar:

The NRC staff is currently reviewing your applications for change to the Technical Specifications as they relate to the Dresden and Quad Cities Stations, Technical Specification Upgrade Program (TSUP). The staff has performed an in-depth review of all the packages submitted so far. As a result of the review, the staff has identified areas where additional information is required (enclosed) to allow the staff to complete its review. We request that you provide a response within 60 days from the date of this letter.

This requirement affects one respondent and, therefore, is not subject to Office of Management and Budget review under P.L. 96-511.

If you have any questions, please contact me at (301) 415-1345.

Sincerely,

original signed by

John F. Stang, Senior Project Manager
Project Directorate III-2
Division of Reactor Projects III/IV
Office of Nuclear Reactor Regulation

Docket Nos. 50-237, 50-249, 50-254, 50-265

Enclosure: Request for Additional Information

cc w/encl: see next page

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REQUEST FOR ADDITIONAL INFORMATION

TECHNICAL SPECIFICATION UPGRADE PROGRAM

DRESDEN, UNITS 2 AND 3

DOCKET NOS. 50-237 AND 50-249

AND

QUAD CITIES, UNITS 1 AND 2

DOCKET NOS. 50-254 AND 50-265

Generic Questions

1. In review of proposed Technical Specification Upgrade Program (TSUP) Sections 3.1, 3.2, 3.5, 3.6, 3.7, 3.8, 3.9, 3.10, and 5.0, the No Significant Hazards Consideration for these applications are not completely accurate and the wording used in the evaluations are confusing. The considerations did not take into account the relaxation of the current Technical Specification (TS) requirement with the adoption of the proposed Standard Technical Specifications (STS). In addition, the staff discovered typographical errors in the considerations. The staff requests that Commonwealth Edison Company (ComEd) re-evaluate the No Significant Hazards Consideration for each application covering the sections listed above and supplement the applications by providing an accurate and complete No Significant Hazards Consideration.

2. In review of proposed TSUP Sections 3.1, 3.2, 3.3, 3.5, 3.6, 3.7, 3.8, 3.9, 3.10, and 5.0, ComEd did not evaluate and provide justification for the relaxations and deviations between current TS requirements and the proposed TS. ComEd has compared only the proposed TS to the STS and provided justification for any deviations. To allow the staff to perform a complete and accurate review of the above proposed TSUP TS sections, please provide supplemental evaluations of any changes or deviations between the current TS and the proposed TS. In addition, for each deviation or relaxation between the current TS and the proposed TS an evaluation should be provided which demonstrates that the proposed TS maintains the current licensing basis as described in the Updated Final Safety Analysis Report.

Questions on Sections 3/4.1

1. Section 3.1.A. Action 1, footnote (a) - This footnote appears to provide for a relaxation of the current TSs (see Note * of Table 3.1.1 for Dresden Unit 3) for both stations and the wording of the proposed TS also appears to be less specific as to the applicability of the footnote than the wording found in the STS. However, the wording of note (a), which incorporates the phrase "required surveillances", associated with the

ENCLOSURE

TSUP Table 3.1.A-1 does more closely follow the wording of the STS. Address whether this footnote (and the note for the Table) provides a relaxation of the current TSs and whether the footnote to the Action statement should be reworded to include specifically mentioning surveillance testing as the cause of the inoperability.

2. Generic question regarding Action statements of Section 3.1 - While the relation of the TSUP Action statements 10 through 19 to those of the STS is basically clear, their relation to the Action requirements of the current TSs for both stations is not. Identify under which of the functional inoperability conditions of TSUP Table 3.1.A-1 do the proposed required Actions represent a relaxation of the required Actions of the current TS for the same functional inoperability. For example, the Reactor Vessel Water Level Low functional inoperability condition current Dresden TS Action A is replaced by TSUP Action 11 and these Actions should be compared in assessing whether this is or is not a relaxation of the current TSs for either station.

3. Referring to current Quad Cities TS 4.1.C, the last sentence under the heading of Specific Changes in Attachment #2 implies that this requirement is captured in proposed note (b) to Table 3.1.A-1. This note reads, "This function may be bypassed, provided a control rod block is actuated, for reactor protection system logic reset in Refuel and Shutdown positions of the reactor mode switch." This has no apparent relevance to the current TS 4.1.C, but the footnote (b) to TSUP 3.1.A. Actions 1 and 2 does appear to capture part of the current TS.

   Identify where all of the provisions of current Quad Cities TS 4.1.C. are located within the TSUP or explain whether the deletion of any part of this TS (particularly the testing of other reactor protection system (RPS) channels in the event of a failed channel) is a relaxation of the current Quad Cities TSs.

4. Proposed TS Table 4.1.A-1 note (a) - With regard to the calibration of the neutron detectors which support the intermediate-range monitor (IRM) and average power range monitor (APRM) system channels, the local-power range monitors (LPRMs) are noted (Table footnote (f)) to be calibrated every 1000 effective full-power hours (EFPH). Does this represent the calibration frequency on the LPRM detectors also or how often are the LPRM and IRM detectors to be calibrated and where is this addressed in the current TSs for each station and in the TSUP amendments?

<u>Questions on Sections 3/4.2</u>

1. In reference to Actions 20 through 24 in proposed Technical Specification Table 3.2.A-1, indicate the relationship of these action statements to those specified in current Dresden Unit 3 Technical Specification Table 3.2.1 and justify any proposed actions which may represent a relaxation of the current Technical Specifications.

2. Identify whether the Minimum CHANNEL(s) per TRIP SYSTEM operability requirements for the main steam line isolation-tunnel temperature high functional unit and the high pressure coolant injection-steam flow high functional unit represent relaxations of the current Dresden Station Technical Specifications.

3. Indicate whether or not the following proposed Technical Specifications (from TSUP Table 3.2.A-1) are represented in the current Dresden Station Technical Specifications: Secondary Containment Isolation on reactor vessel water level low (2a.), drywell pressure high (2b.), and reactor building ventilation exhaust radiation high (2c.); High Pressure Coolant Injection Isolation on reactor vessel pressure low (6b.); and Shutdown Cooling Isolation on reactor vessel water level low (7a.) and recirculation line water temperature high (7b.).

4. With regard to proposed Technical Specification Table 3.2.A-1 note (g) on the establishment of main steamline isolation trip setpoints due to high tunnel radiation with and without the addition of hydrogen to the feedwater, should hydrogen injection capability for unit 2 be lost during operation, what procedures and requirements would exist for the establishment of different trip setpoints given the change in operating conditions postulated above?

5. Assess the following observation generic to most sections of proposed Technical Specifications 4.2.; the testing of logic systems appears to be established on an 18 month basis in most cases while the required interval in the current Technical Specifications may not be as clearly defined. Identify the requirements for current logic system functional testing associated with the instrumentation and trip systems addressed in proposed Technical Specification sections 3/4.2 and compare these requirements with the proposed requirements.

6. Identify the surveillance requirements established under the current Dresden Station Technical Specifications for the following functional units given in proposed Technical Specification Table 4.2.A-1: reactor vessel water level low (1a., 2a., 4b., 7a.), reactor building ventilation exhaust radiation high (2c.), drywell radiation high (1c.), standby liquid control system initiation (4a.), and recirculation line water temperature high (7b.).

7. Address whether or not the proposed channel calibration frequencies for the following functional units from Table 4.2.A-1 represent a relaxation when compared to the current Technical Specifications: refueling floor radiation high, main steamline tunnel radiation high, main steamline flow high.

8. Identify whether the alarm setting mentioned in current Dresden Station Technical Specification Table 3.2.1. note 6. is included within the scope of the proposed Technical Specifications.

9. From proposed Technical Specification Tables 3.2.B-1 and 4.2.B-1, identify the location of any channel operability requirements and surveillance frequencies within the current Technical Specifications for the following functional units: core spray pump discharge flow low (bypass) (1d.), low pressure coolant discharge flow low (bypass) (2d.), condensate storage tank level low (3c.), suppression chamber water level high (3d.), reactor vessel water level high (trip) (3e.), and high pressure coolant injection pump discharge flow low (bypass) (3f.).

10. Identify whether or not the modification in the trip setpoints for the core spray and low pressure injection pump discharge pressures (proposed Technical Specification Table 3.2.B-1 4e., 4f., 5e., 5f.), represent a relaxation of the current Technical Specifications for Dresden Station and if so provide justification.

11. Identify and justify whether actions 30 through 36 associated with Table 3.2.B-1 in the proposed Technical Specifications are a relaxation of current Technical Specification action requirements for the associated functional units.

12. Identify, with reference to notes B.7. and B.18. in Attachment 2, the items being mentioned as Table 3.2.B-1 2.e, 2.f, and 2.g; and Table 4.2.B-1 2.e, 2.f, 2.g, and 2.h. These items do not appear in the Tables contained in Attachment 3.

13. Clarify the justification for proposed Technical Specification 3.2.B. Action 3. on the Automatic Depressurization System and address any plant-specific issues relevant to Dresden Station.

14. Identify for proposed Table 4.2.B-1 whether the channel calibration frequency for the core spray and low pressure coolant injection discharge low (bypass) functional units represents a relaxation from the current Dresden Technical Specifications.

15. Explain the similarities and differences between the channel check frequencies for the emergency bus undervoltage functional units proposed in Table 4.2.B-1 and the instrument check frequencies as given in current Technical Specification Table 4.2.1.

16. In evaluating proposed Technical Specifications 3.2.C. action 2. (in particular the clause concerning "both TRIP SYSTEM(S)") and action 3.a., identify what timeclocks the current Technical Specifications would impose for these conditions and provide justification if the proposed specifications involve a relaxation.

17. Concerning the channel calibration of the reactor vessel pressure high functional unit for the actuation of the isolation condenser (proposed Table 4.2.D-1), identify if this is a relaxation of current Technical Specifications for Dresden Station and if so justify.

18. Examine the action requirements of current Dresden Technical Specification 3.2.C.2 on control rod block instrumentation and evaluate proposed Technical Specification Table 3.2.E-1 action 51 to determine whether or not this is a relaxation and justify as appropriate.

19. Identify where in the current Technical Specifications information on the inoperative functional units for the rod block monitors, average power range monitors, source range monitors, and intermediate range monitors is located (proposed Technical Specification Tables 3.2.E-1 and 4.2.E-1).

20. Concerning proposed Table 3.2.E-1 note (i) and 3.2.G. note (b), provide additional information to justify the incorporation of this contingency which is not included in the current Technical Specifications.

21. Action 60 from proposed Technical Specification Table 3.2.F-1 on accident monitoring information appears to provide for a relaxation of the action requirement from the current Technical Specifications. Examine these statements and provide additional justification as appropriate.

22. The minimum number of operable channels for drywell air temperature monitoring appears to have been reduced in the proposed Technical Specifications (Table 3.2.F-1 7.) from the number required in current Technical Specification Table 3.2.6. Address this issue and provide justification as appropriate. Additionally, indicate where in the proposed Technical Specification the requirements for narrow range torus water level indication, torus pressure, and torus to drywell differential pressure (from Table 3.2.6) are captured.

23. In comparing proposed Technical Specification Table 4.2.F-1 and current Technical Specification Table 4.2.4, indicate whether or not the following surveillance requirements are relaxations and if so provide justification as necessary. For example, examine channel check and channel calibration frequencies between the current TS and the proposed TS and note deviations.

Reactor Vessel Pressure	Channel Check	Channel Calib.
Reactor Vessel Water Level	Channel Check	Channel Calib.
Torus Water Level - Narrow Range	Channel Check	Channel Calib.
Torus Water Level - Wide Range		Channel Calib.
Drywell Pressure - Narrow Range	Channel Check	Channel Calib.
Drywell Air Temperature	Channel Check	
Torus Water Temperature	Channel Check	Channel Calib.
Torus Water Level - Wide Range		Channel Calib.
Acoustic SRV Position Indicators		Channel Calib.
Neutron Monitors	Channel Check	Channel Calib.

24. Indicate where in the current Technical Specifications information related to the Drywell Hydrogen Concentration - Analyzer and Monitor is located (proposed Technical Specification Table 4.2.F-1 8.).

Questions on Sections 3/4.5

1. Concerning proposed TS Section 3.5.A. - Confirm that the definition of the low-pressure coolant injection (LPCI) subsystem is consistent with the plant design. Does the design define this as two LPCI subsystem loops with two LPCI pumps in each and have the LCO require that both LPCI subsystem loops be operable? This ties into the definition of the LPCI subsystem loop found in 3.5.B.2 for emergency core cooling system (ECCS) availability in operational modes 4 and 5 where the second definition of a LPCI subsystem loop (i.e., "One or both low pressure coolant injection loops...") has been adopted.

   Concerning LCO 3.5.A. Action 2.b.- The only provisions made for the operation of the unit following the LPCI subsystem being "otherwise inoperable" is for both of the Core Spray subsystems to be operable. Does this LCO adequately maintain the requirements of current TS 3.5.A.5 on the availability of the Containment Spray function of the LPCI subsystem, or how is its operability to be addressed to justify continued operation for the succeeding 7 days?

   Finally, concerning Section 3.5.A. Action 2.b., the conditions described in this section appear to be more consistent with the conditions associated with STS 3.5.1. Action b.4 which refers to the inoperability of both LPCI subsystems (in effect determining the LPCI system of a BWR/4 design to be inoperable). Explain how this interpretation is or is not consistent with the condition of the one LPCI subsystem at Dresden Station being "otherwise inoperable" and address the applicability of STS 3.5.1. Action b.4.

2. Identify how the operability of the LPCI and Core Spray pump compartment doors, raised in conjunction with the ECCS systems in current Dresden TSs 3.5.A.7 and 4.5.A.7 and in conjunction with secondary containment considerations in current Quad Cities TSs 3.7.C.2 and 4.6.C.2, are addressed in the proposed TSs.

3. Proposed TS 3.5.A. Action 3 - The timetable in the current Dresden TS 3.5.C.2.a regarding the high-pressure coolant injection (HPCI) system requires restoration of operability within 7 days whereas the proposed TS extends this to 14 days. Provide justification for granting the relaxation and address the same issue when comparing current Dresden TS 3.5.E.2 to the proposed TS 3.5.D Action statement for the Isolation Condenser system.

4. Considering the current Dresden TSs for the HPCI system in 3.5.C.2.b. and Table 4.5.1. Item 4, this appears to also apply surveillance requirements when entering operational mode 2 after an outage in which HPCI maintenance was performed, but this is not retained in the proposed TSs. Explain why this is or is not a relaxation and if it is a relaxation provide justification for granting the relaxation.

5. Proposed Dresden TSs 3.5.A. Action 4.a and Action 4.b - As in a prior question, it is noted that this proposed TS implements a different timetable from that found in the current Dresden TS. Further, the proposed TS does not specifically mention the imposition of maximum average planar linear heat-generation rate (MAPLHGR) limits and reduction factors (MAPLHGR 'penalties' as mentioned in Attachment 2 note A.3). Explain whether the MAPLHGR limits are to be associated with the proposed 14 day return-to-operability period. If MAPLHGR limits are not to be imposed, explain why this is or is not a relaxation of the current TSs and provide justification if it is a relaxation.

6. Proposed TS 3.5.A. Action 5 - Based upon the notes included for supplementary information in Attachment #2 to the package and the comparison matrix, some ambiguity exists with regard to this specification. Note A.10 discusses an "Action 5.b" which is not included in the proposed TSs and, in addition, it refers to the HPCI system when the proposed Action 5 deals with LPCI and Core Spray systems. Secondly, note A.16 identifies proposed TS 3.5.A. Action 5 as being an "adopted" TS Dresden Station and Quad Cities Station from the current TSs at LaSalle Station and that no guidance is given on this issue in the STS, but does not clearly note whether any current TSs exists for either Dresden or Quad Cities Stations. Identify whether this "adopted" TS replaces a current Dresden or Quad Cities specification or whether the proposed TS is completely new.

7. Proposed Section 3.5.A. Actions 6 and 7 - Identify whether the requirements outlined in these sections are entirely new to the Dresden Station and Quad Cities Station TSs or are contained in a section of the current TSs of either facility.

8. Indicate where the current Dresden TSs 4.5.A.1.f, 4.5.A.3.f, Table 4.5.1.1 Item 6, and 4.5.D.1.c, all referring to the testing of logic systems associated with the Core Spray, LPCI, HPCI, and automatic depressurization systems (ADS) incorporated into the proposed TS. If these requirements are not included in the proposed TSs, note whether this is a relaxation of the current Dresden TSs and justify as appropriate.

9. Identify how current Dresden Station TSs 4.5.H.2 and 4.5.H.3 are addressed in the proposed TSs. The current 4.5.H.2 appears to address periods following entry into operational modes 4 and 5 where the specifications of the proposed 3/4.5.B may be applicable, but these sections do not appear to contain the same surveillance requirement.

10. Explain whether the compensatory actions to be undertaken in the proposed TSs (3.5.A. Action 6) with regard to an inoperable Core Spray subsystem header delta P instrumentation channel are or are not a relaxation of the current Dresden TSs.

11. Explain whether the current Quad Cities TSs 3.5.E.2. and 4.5.E.3.b., which provide guidance regarding the reactor core isolation cooling (RCIC) system during startup following a refueling outage or an outage during which work was performed on the RCIC system, have been deleted from the proposed TSs and, if so, whether this is or is not a relaxation of current Quad Cities TSs.

12. The phrase "reactor vessel operating pressure" in proposed Quad Cities TS 4.5.D.2 appears to be consistent with the STS. However, the current Quad Cities TSs require the RCIC surveillance to be performed at a pressure equal to or in excess of 1150 psig. Indicate whether the proposed change is or is not a relaxation of the current TSs.

13. The current Quad Cities TS 4.5.E.5 specifically requires a test of the logic system associated with the RCIC system each refueling outage. Describe the scope of this surveillance and whether it is or is not captured in the proposed TSs 4.5.D.3.a and/or 4.5.D.3.c.

14. In reference to the proposed TSs 3.5.A.7 for both Quad Cities and Dresden Stations, submit proposed TSs 6.6.B.4 and 6.9.B which are referenced in TS 3.5.A.7 for the respective stations.

15. In comparing the current Quad Cities TS 4.5.D.1.a to the proposed TS 4.5.A.4.b.1 regarding the surveillance of the ADS system, explain whether the proposed version is a relaxation of the current requirements based on the surveillance interval differences and, if so, justify.

16. Identify whether or not the surveillance requirements of current Quad Cities TSs 4.5.G.2. and G.3 are contained within the proposed TSs. Note in particular that current TS 4.5.G.3 incorporates a 24 hour time schedule.

Questions on Sections 3/4.6

1. Indicate whether or not the requirement on the vessel flange to vessel shell allowable temperature differential (current TS 3.6.A.3) is being retained in the proposed TSs, and if not, justify its deletion.

2. Explain whether proposed TS 3.6.G.2 should refer to the drywell floor drain sump sampling system, similar to the reference in current Dresden TS 3.6.D.2 to the primary containment sump sampling system?

3. Concerning the proposed TS 3.6.B. Action statements, current Dresden and Quad Cities TSs 3.6.G.2 place additional restrictions on jet pump flow indication when exiting operational mode 4, but this does not appear in the proposed TSs. Further, the actions to be taken (be in Hot Shutdown in 12 hours vs. be in Cold Shutdown in 24 hours) also appear to be different and may constitute a relaxation of the current TSs. Explain whether a relaxation of the TSs is being proposed and justify as appropriate.

Clearly define how the proposed TSs relate to the current Quad Cities TSs and if they do or do not represent a relaxation. Also, address the need for compensatory flow calculations with inoperable flow indication monitors (current Quad Cities TS 3.6.G.3) and how this is or why this is not explicitly incorporated into the proposed TSs.

4. Identify whether the statement in proposed TS 3.6.C.1. Action 1 on recirculation pump speed differential represents a relaxation of current Dresden TS 3.6.H.2 and, if so, justify. This is particularly relevant in the case of Dresden Station and the implementation of the LPCI loop select logic.

5. Note A.4 mentions that ComEd is proposing to delete the current Dresden Station TSs 3.6.H.3.b, 3.6.H.3.c, 3.6.H.3.e, 4.6.H.3.a, and 4.6.H.3.b. As of Amendment #121, dated June 16, 1994, TS 4.6.H.3 has been deleted. Indicate the relation of proposed TSs 3.6.A. Action 1.a and Action 1.c to the current Dresden Unit 3 TSs 3.6.H.3.e, 3.6.H.3.b, and 3.6.H.3.c.

6. The MAPLHGR reference in current Dresden TS 3.6.H.3.g is understood to be included in the proposed TS 3.6.A. Action 1.d. However the current Quad Cities TSs in Section 3.6.H.3 do not have a reference to MAPLHGR limits. Explain how this difference between the stations is to be resolved in their core operating limit reports (COLRs) under the proposed TSs.

7. Identify whether the statements in proposed TS 4.6.K on maintaining operation within pressure/temperature limits represent a relaxation of current Dresden TSs 4.6.A and 4.6.B. The apparent relaxations apply to the frequency with which the temperature is recorded, the temperature readings which are specified to be recorded, and with regard to 4.6.B.1 the temperature range over which the temperature records are required.

8. With regard to current Dresden TS 4.6.C.1.c on the monitoring of the primary coolant activity during shutdown procedures after recording I-131 Dose Equivalent levels in excess of 4.0 microcuries/gram, the proposed TS 3.6.J. Action 1 only indicates that Hot Shutdown is required in 12 hours but does not impose any specific monitoring guidance. Identify how the requirements of the current TS are maintained, or provide justification for their deletion, in the proposed TSs. Additionally, address whether the surveillance requirements in proposed TS Table 4.6.J-1 Item 2 on Dose Equivalent I-131 Concentration are a relaxation of the current timetable in Dresden TS 4.6.C.1.a.

9. In examining current Quad Cites TS 4.6.C.1.c, it seems to suggest guidance on isotopic analysis of radioiodides down to 0.05 microcuries/gm under the given pre-operational conditions. Identify whether the requirements of this section are found elsewhere in the proposed TSs and if they are not, explain if this is a relaxation of the current TSs.

10. Identify whether the surveillance requirements of proposed Technical Specification 4.6.I are to be understood only to apply to operational modes 1, 2, and 3.

11. The current Dresden Station TS 4.6.C.3.a requires conductivity and chloride ion content analysis upon abnormal conductivity indication by the continuous conductivity monitors. The proposed TSs do not appear to maintain this requirement. Identify the location of this requirement in the proposed TSs or identify if its deletion is or is not a relaxation of the current TSs.

12. Proposed TS 4.6.I.3 in addressing operation with an inoperable continuous operating conductivity monitor does not prescribe chloride ion content analysis with any set schedule (as is found in current Dresden TS 4.6.C.3.b). Identify the location of this requirement in the proposed TSs or identify if its deletion is or is not a relaxation of the current TSs.

13. Identify whether or not the relief valve setpoints in proposed TS 3.6.F represent a relaxation in setpoint pressure when compared to the setpoint in current TS 4.6.E (valve nos. 203-3A through 203-3E). If this a relaxation of the current specification, provide a justification.

14. Explain the differences in wording of proposed TS 4.6.B.1.b. "from established core plate delta P/core flow relationships" vs. the STS 4.4.1.2.b. "from recirculation loop flow measurements" and the current TS 4.6.G.1.b. "from established power-core flow relationships".

15. Section 3/4.6.M on the Main Steam Isolation Valves is indicated to be a rewrite of the existing TSs, provide a list of all applicable current Dresden and Quad Cities TSs relevant to these sections which are being rewritten.

16. The Executive Summary Sections O and P as well as notes O.1 and P.1 indicate that the corresponding proposed TSs on Shutdown Cooling are rewrites of current specifications. Note the sections of the Quad Cities TSs which are being rewritten in proposed TSs 4.6.O and 4.6.P.

Questions on Sections 3/4.7

1. Confirm that the suppression pool water level requirements of proposed TS 3.7.K.1 (14' 6.5" to 14' 10.5") are equivalent to the current values of Dresden TSs 3.7.A.1.b. and 3.7.A.1.a. (112,000 ft^3 to 115,565 ft^3). Note K.3 of Attachment 2 to this package appears to indicate this fact but does not confirm it by specific reference to current Dresden TSs. Also, identify how the values above relate 3.7.A.1.d. and e. in the current TSs on downcomer submergence.

2. Based on the comparison of proposed TSs 3.7.K.1 and 3.5.C.1, it appears that the LCO described in the former is consistent with and conservative

to those in the latter. Explain why the requirement of 3.5.C.1 should not be written consistently with 3.7.K.1 since both must be met for operational modes 1, 2 and 3.

3. With regard to the proposed TSs in section 3.7.K.3. on leakage between the suppression chamber and the drywell, indicate the location of current Dresden TS(s) governing this leakage condition. Provide the same information for Quad Cities also.

4. Concerning current Dresden TS 3.7.A.3.a, where in the proposed TSs is the definition of operability of the Reactor Building-Suppression Chamber Vacuum Breakers captured, or is the definition to be inferred from the corresponding surveillance requirements?

5. With regard to proposed TS 3.7.F Actions 1, 2, and 3, current Dresden TS 3.7.A.3.b requires that the inoperable breaker (open or otherwise) be locked closed prior to the operation of the unit over the succeeding seven days. Explain whether the Actions of the proposed TS represent a relaxation of this requirement. Further, explain whether or not the incorporation of a 14-day timetable for restoration of the position indicator (Action 3) or daily monitoring also represents a relaxation of current Dresden TS 3.7.A.3.b.

6. Explain in more detail the statement in Attachment #2 Note E.2 which contends that the requirements of proposed TS 3.7.E. Action 1 are at least as conservative as existing Dresden TS (3.7.A.4). The current Dresden TS does not make any additional allowances for returning to operability any required suppression chamber to drywell vacuum breakers whereas the proposed TS allows 3 days of operation. Further, indicate whether the "position alarm circuitry" of current Dresden TS 3.7.A.4.c. is to be included in the consideration of the "position indicator" as stated in proposed TS 3.7.E. Action 3.

7. Identify whether or not the addition of points 1 and 2 to the Applicability statement of proposed TSs 3.7.J. and 3.7.H. constitute a relaxation of the current TSs 3.7.A.5.a and 3.7.A.7.a which require applicability in RUN mode operation and if so provide justification for the inclusion of points 1 and 2. Address the schedule of proposed surveillance 4.7.J also in answering this question.

8. Explain how remaining in mode 1 as required by the Action statement of proposed TSs 3.7.J and 3.7.H. and reducing power to < 15% of rated thermal is conservative to the existing TSs 3.7.A.5.b. and 3.7.A.7.b. Action 1 (or the STS) which requires the implementation of mode 2 in a shorter (6 hours vs. 8 hours) timeframe.

9. Concerning the proposed Quad Cities TS 3.7.H, identify whether or not the value of 1.0 psid constitutes a relaxation of the current TS 3.7.A.6 which uses a value of 1.20 psid for the minimum drywell-suppression chamber differential pressure.

10. As a matter of consistency, should the word 'purge' be inserted in the appropriate locales on proposed TS 3.7.I so as to make it consistent with 4.7.I?

11. Provide a justification of the relaxation in the proposed TS 3.7.I. Action statement on primary containment nitrogen purge system availability versus current Dresden TS(s) 3.7.A.6.a and/or 6.c.

12. Explain whether or not current Dresden Station TSs 3.7.A.6.b, 6.d, and 6.e, again on aspects of the containment purge system, are captured in their entirety within the proposed TSs.

13. Explain where in the current Dresden TSs the requirements for the drywell-suppression chamber differential pressure instrumentation are located (proposed TSs 3.7.H. Action 2, 3, and 4).

14. Current Quad Cities TS 4.7.B.1.a requires surveillance testing of the standby gas treatment system after the other system is found to be inoperable. This is coupled with the 3.7.B.1.a specification which requires that when one system is inoperable the other is "demonstrated" to be operable. Identify whether or not this requirement is contained in the proposed TSs for Quad Cities Station and if not, if its omission is a relaxation of the current TSs.

15. Identify the relevance of current Quad Cities TSs 4.7.A.2.d.4. and 5. (concerning valves MO1-200-1, MO1-200-2, MO1-200-3, and MO 1-200-4 and testing to be performed at the end of the cycle 11 refueling outage) and whether these specifications should be deleted in the proposed TSs under review.

16. Regarding proposed Quad Cities TS 3.7.E. Actions 2 and 3, clarify the relationship between these proposed TSs and the current Quad Cities TSs 3.7.A.4.b and/or 4.7.A.4.b.4. These specifications address the testing of non-fully closed drywell-suppression chamber vacuum breakers via differential pressure decay methods.

17. Identify whether or not the current Dresden TSs 3/4.7.B.3.c on the testing of air distribution on the high-efficiency particulate air (HEPA) filter bank after maintenance are contained within the proposed TSs.

18. Based on current Dresden and Quad Cities TS 4.7.B.2.a, the proposed TSs in 4.7.P.2. for the stations appear to be a relaxation of the current requirements based upon the omission of the 720 or 1440 hours of operation criteria, respectively. Identify whether or not this is a relaxation, and if it is provide justification.

19. Explain whether the omission of reference leg check valves, included in current Dresden and Quad Cities TSs 3.7.D.1, in the proposed TS 3.7.D.1 constitutes a relaxation of the current TS and, if so, provide a justification of this omission.

20. Examine the relationship between current Dresden TSs 3.7.D.2 and 3.7.D.3 and the Action statement of proposed TS 3.7.D.1. The four hour period for return-to-operability and the additional twelve hours to achieve cold shutdown may constitute a relaxation of the current TSs. If so, provide a justification for this relaxation.

21. Indicate where the subject of the main steamline air pilot valves (current Dresden TSs 3.D.4, D.5, D.6, and 4.D.4) is addressed in the proposed TSs or explain the deletion of the specific current TSs listed above. Likewise, address this subject for Quad Cities Station.

22. Indicate where the subject of traversing in-core probe system explosive isolation valves would be addressed in the current TSs for each of the stations (see proposed TS 4.7.D.5).

23. Concerning current Dresden TSs 4.7.A.4.a and 4.7.A.4.b.2 on suppression chamber-drywell vacuum breakers, the requirements on the position alarm systems mentioned do not appear to be included in the proposed TSs 4.7.E.2.b and 4.7.E.2.c.2. Explain whether this omission is a relaxation of the current TSs and, if so, provide justification.

24. Provide information as to the status of current TSs 4.7.A.2.f.1 and f.2 for the monitoring of leakage rates based on the review of inerting system make-up requirements within the proposed TSs.

25. Clarify the status of current Dresden TSs 4.7.A.6.a through 6.c with respect to the proposed TSs in 4.7.I. Address the differences in terminology, surveillance schedule, and actuation of valves vs. verification of valve position in the response and how the difference do or do not reflect a relaxation of the current TSs.

26. Proposed Quad Cities TS Sections 3/4.7.I on the Primary Containment Nitrogen Purge System is noted in Attachment #2 as a rewrite of existing specification. Identify which sections of the current TSs for Quad Cities are being replaced with 3/4.7.I.

27. Address how the oxygen analyzing system of current TS 4.7.A.6.d is included within the proposed TSs. If it has been omitted, provide a justification of this omission if this represents a relaxation of the current TSs.

28. Identify whether or not proposed TS 3.7.L (Suppression Chamber and Drywell Spray) represents a rewrite of current Dresden TSs 3.5.A.6, 3.5.B.1, 3.5.B.3, and 3.5.B.4. Note also the location of current Dresden TSs which correspond to the proposed TSs 4.7.L.1 and 4.7.L.2.

29. Proposed TS 3/4.7.M (Suppression Pool Cooling) are identified as a rewrite of existing TSs. Identify the current Dresden and Quad Cities TSs which are being replaced by the proposed TSs.

Questions on Sections 3/4.8

1. Identify how is operational mode or condition 3 (Hot Shutdown) addressed in note A.2 in Attachment 2 with regard to the STS 3.7.1.1 Action b. Identify which system is providing support to the heat removal system in this operational mode and address whether this system should be included within the TSs.

2. Identify what provisions are made within the TSs for long term core cooling in the event of a loss-of-coolant accident (LOCA) and which primary system and service water systems are responsible for providing support for heat transfer from the primary system to the ultimate heat sink.

3. In the consideration of the 3.8.C Action 2 and 3 statements, this specification which has an impact on operational modes 4 and 5 appears to consider the function of the Shutdown Cooling System at Dresden Station. Identify whether or not the Ultimate Heat Sink is also required to support the Shutdown Cooling System in the removal of decay heat and should, in operational modes 4 and 5, the Shutdown Cooling System be declared inoperable if the Ultimate Heat Sink is inoperable.

4. Concerning the Applicability statement, explain why are operational modes 4 and 5 (cold shutdown and refueling) not being included in TS 3.8.D. Note D.2 refers to a basis on "current TS applicability" but this has been identified in D.1 as a new specification for Dresden Station.

6. Identify the current Dresden and Quad Cities TSs which address the operability of control room emergency ventilation (CREV) system.

7. Provide information on the current methods that are in place at Dresden Station for the surveillance of the CREV system.

8. Concerning 4.8.D.5.b, the related STS requirement specifies a specific time for the actuation of the system in response to one or more isolation signals. Identify how the issue of actuation time is addressed within the proposed Dresden TSs for a manual input.

9. Explain the inclusion of the word 'required' in proposed TS 3.8.F and identify the basis used for the determination of which snubbers are 'required'.

10. In comparing the last paragraph of the Action section in the proposed TS 3.8.F. to the requirements of the current Dresden TS 3.6.I.3, it appears that the Action requirements if a snubber is determined to be inoperable and cannot be returned to operable status within 72 hours may have been relaxed depending upon the system to which the inoperable snubber is attached (from a "be in mode 4 or 5" within 36 hours to "declare attached system inoperable"). Identify whether this is or is not a relaxation of the current Dresden TS and, if so, justify.

11. In section 4.8.F.3, there appears to be the establishment of three snubber classifications based on visible inspection and/or functionality; operable, inoperable, and unacceptable. The unacceptable classification is directly related to a snubber which is not determined to be operational by visual inspection. Further inspection and testing are required in paragraph 2 to determine if the snubber is classified as operable or inoperable.

    However, the allowable operational period during the review and evaluation to justify continued operation with an unacceptable snubber is not well defined and only after the snubber is declared inoperable will Action requirements of 3.8.F be taken. Comparing to the STS, a snubber which is not determined to be operable and its associated system should be subject to the Action(s) in STS 3.7.4 (equivalent to the Dresden 3.8.F Action requirements. Provide an explanation of how this proposed TSs is to be implemented and whether or not it represents a relaxation of the current Dresden TSs.

12. Identify the current requirement in the Dresden Station TSs regarding the volume percentage of hydrogen gas allowed in the offgas holdup system.

13. Proposed TSs 3/4.8.J seems to relate to current Dresden TSs 3/4.8.D "Radioactive Waste Storage". As such, the Action statement of 3.8.J. appears to have been relaxed from recycling Actions within 24 hours under the current TSs to Actions within 48 hours under the proposed TS. Additionally, the monitoring frequency required under the proposed 4.8.J. during additions to the tank is 7 days as compared to the current Dresden TS frequency of 4.8.D of every 72 hours if an addition has been made to the tank. Identify whether or not these are a relaxation of the current TSs and, if so, provide a justification for the relaxation.

Questions on Sections 3/4.9

1. Proposed Action statements 1.b and 2.b under LCO 3.9.A requires demonstrating emergency diesel generator (EDG) operability within 24 hours of losing one source of off-site power (if not successfully proven within the past 24 hours), with a recheck within 72 hours. The STS has more stringent requirements of an initial check within one hour and rechecks every 24 hours. There is no justification given for changing the initial check to within 24 hours (or no check if previously performed), and the justification given for the mid-allowable outage time (AOT) check does not explain why a similar requested change for Duane Arnold applies to Dresden and Quad Cities.

2. Proposed Action statements 2.b and 3.b under LCO 3.9.A allows an exclusion to demonstrating operability of other AC sources if an EDG is inoperable for preplanned preventive maintenance without any justification for the exception. This exception is neither currently authorized nor allowed under STS. This would potentially allow operation without the required off-site and on-site AC power sources for

a week without having to demonstrate operability of any of the remaining sources, as long as the maintenance was planned, which is not a conservative Action. Provide justification for this relaxation of the current TSs.

3. Similar to the questions above, proposed Action statement 3.b under LCO 3.9.A has similar unjustified relaxations for operability determinations for EDGs.

4. Proposed Action statement 3 under LCO 3.9.A allows a relaxation of current requirements in that it would allow continued operation with one EDG and one off-site AC power source inoperable, when this condition is not currently allowed for these sites. No justification is provided as to why this condition would be acceptably safe for these specific sites.

5. Proposed Action statement 4.a under LCO 3.9.A is not worded so as to meet the intent of STS 3.8.1.1.c or as described in attachment 2 paragraph 12. Also, justification that a requirement used at Limerick is appropriate for use at Dresden and Quad Cities is required.

6. Proposed Action statements 5 and 6.b under LCO 3.9.A have the following problems:

   a. It eliminates current requirements to ensure all core and containment cooling systems are operable without justification for this relaxation.

   b. It changes the operability check time requirements for the EDGs in the same manner as discussed above in comment 3 without justification.

7. Proposed Action statement 7 under LCO 3.9.A allows 7 days to restore fuel oil properties, or declare the associated EDG inoperable, at which time another 7 day clock starts; all this is after a 31 day period allowed for analyzing the oil sample. This does not appear conservative, particularly if the fuel oil properties are such that they will not actually support running the associated EDG. This Action is not currently allowed at either station or in the STS, and would constitute a relaxation of requirements. Site-specific justification is required for this item.

8. Proposed Action statement 8 under LCO 3.9.A specifies a report to the NRC in accordance with specification 6.6.B.4, which in turn refers to a table which contains nothing to do with diesels. Either the reference needs correcting, or the table needs updating to include the problem diesel category.

9. Proposed Action statement 8 under LCO 3.9.A requests changes to conform to draft revision 3 to Regulatory Guide 1.9 (which is still a draft), without regard to the more recent NRC discussion in Generic Letter (GL)

94-01. As that GL was issued more recently than the current submission for license amendment, do Dresden and Quad Cities intend to apply for amendments as allowed under the GL?

10. Proposed Surveillance Requirement (SR) 4.9.A.1.b does not include testing the automatic transfer feature which is tested in the STS SR 8.1.1.1.b. The justification given in attachment 2 is confusing and does not appear to explain not incorporating the whole SR.

11. Proposed SR 4.9.A.2 has associated proposed note "a" which states:

    "All planned diesel generator tests shall be conducted in accordance with manufacturer's recommendations regarding engine prelube, leak detection and warmup procedures, and as applicable regarding loading and shutdown recommendations."

    This is not correct. Per draft revision 3 to Regulatory Guide 1.9, GL 84-15 and STSs, some EDG surveillance are to be performed from ambient conditions in order to verify that the design basis for rapid backup power availability is met.

12. Proposed SRs 4.9.A.2.c and 4.9.A.7.a state that the EDG should start and "...accelerate to synchronous speed..." Synchronous speed is a term which applies to electric motors and generators, not engines; synchronous speed is a comparison between the speed of the field to the armature, while the desired engine speed is a function of the desired electrical frequency and the design of the generator.

13. Proposed SR 4.9.A.2.f allows taking one EDG starting air receiver tank out of service. This is not currently allowed, nor is it allowed in the STS. This represents a relaxation in requirements, and is not adequately justified.

14. A note appears at the bottom of the center column of page 10/32 and several subsequent pages of the change matrix, below SR 4.9.A.4, which is not explained. It appears this note is only applied to Quad Cities, but it is not currently in that TS. An explanation of its origin and the need to exclude the tank should be provided.

15. The order of the notes in section 3/4.9 is jumbled. Alphabetical order should be restored and letter gaps eliminated.

16. Proposed SR 4.9.A.5 requires water and sediment checks twice.

17. Proposed SR 4.9.A.5 allows the addition of new fuel oil to the storage tanks prior to all required tests being complete, specifically viscosity. This is a relaxation of current requirements in that it could lead to contaminating the fuel supply without knowing it for a month. The STS bases for this section do not discuss the sampling of fuel oil, but the improved technical specifications (ITS) bases clearly indicate

all tests are to be completed prior to the addition of new fuel oil to the storage tanks.

18. It is unclear why the actual permissible values for the tests to be performed on fuel oil are deleted in SR 4.9.A.

19. Proposed SR 4.9.A.6.b allows five times the STS-allowed value for particulate content, without justification. This is a relaxation of requirements and should be discussed.

20. Why are the 2000 hour ratings listed in 4.9.A.8.h higher than the 2 hour ratings?

21. Proposed SR 4.9.A.10 does not include pressure testing the system, as required in the related STS SR. Attachment 2, paragraph A.26 makes it appear that it was to be included, or else a justification for not including it is needed.

22. Proposed SR 4.9.B requires following SR 4.9.A except 4.9.A.2.d. This exception is apparently in error, and does not match the exception in the related STS.

23. Proposed Action statements 1 and 2 under LCO 3.9.C lengthen the amount of time that batteries may remain out of service, making them equivalent in some cases to current Quad Cities requirements, without justification as to why Dresden is sufficiently like Quad Cities. Citing the use of 72 hours as a compromise between AOTs of 2 hours to 14 days is inaccurate, as the AOTs allowing more than 2 or 72 hours are specific and relate to a total time in an operating cycle. Action statement 2 is confusing in its wording, but allows longer to restore a 125V battery to service if the opposite unit is also operating than if it were shutdown. This does not make sense, is contrary to current requirements, and is not justified.

24. Proposed SR 4.9.C.4 does not incorporate all STS 18 month battery requirements. The associated note (C.6) in attachment 2 states that all STS requirements are incorporated. This should be discussed.

25. Proposed SR 4.9.C.4 allows a different battery capacity during the 60 month test discharge, but does not specify if the higher or the lower of the two is acceptable.

26. Proposed Table 4.9.C-1 improperly places note "b" in the box associated with Specific Gravity and Limits For Each Connected Cell. This should be discussed.

27. Proposed note "a" under SR 4.9.C and 4.9.D allows the use of an alternate 125V battery. However, the associated LCOs do not discuss this. This should be clarified.

28. The proposed applicability for 3.9.G lists an exception to mode 4 that it only applies when a control rod is withdrawn. However, the discussion in attachment 2, paragraph F.1 states that the exception applies when there is no fuel in the reactor vessel and when no control rods are withdrawn. These directly conflict. Also, justification needs to be provided why Dresden and Quad Cities should be allowed to use an exception allowed at Perry.

29. Proposed SR 4.9.G.1 changes current and STS SRs from a 6 month periodicity to a period that could last an entire cycle. The justification cites GL 91-01 as recommending this change as an alternative to current requirements. The proposed periodicity represents a relaxation of requirements and requires further justification.

30. Proposed Action statements do not include provisions for inoperable 24/48V batteries or chargers. Is this an oversight?

31. Proposed SR 4.9 deletes the current monthly requirement for an operability check on the diesel starting air compressors without justification.

32. The third paragraph of proposed bases page 3/4.9-3 requires editing.

33. Attachment 6 (Sections 3/4.9, 3/4.10, and 5.0) states that:

    "It has been determined that the proposed changes meet the criteria for a categorical exclusion as provided under 10 CFR 51.22(c)(9). This conclusion has been determined because the changes requested do not pose significant hazards consideration or do not involve a significant increase in the amounts, and no significant changes in the types, of any effluent that may be released offsite."

    However, the 10 CFR 51.22(c)(9) exclusion is for changes which involve installation or use of a component, or which changes an inspection or surveillance requirement which also meet the criteria listed above. The incomplete application of the referenced exclusion is incorrect, and it appears that an environmental assessment statement is required, as most of the proposed changes to this section do not involve components, or inspection or surveillance requirements.