May 9, 1995

U. S. Nuclear Regulatory Commission

Attn: Document Control Desk Washington, D.C. 20555



Subject:

Dresden Nuclear Power Station Units 2 and 3 Quad Cities Nuclear Power Station Units 1 and 2

Response to NRC Staff Request for Additional Information (RAI)
Regarding the Technical Specification Upgrade Program (TSUP)

NRC Docket Nos. 50-237/249 and 50-254/265

References:

- (a) J. Stang letter to D. Farrar, dated February 22, 1995.
- (b) P. Piet letter to T. Murley, dated July 29, 1992.
- (c) P. Piet letter to T. Murley, dated January 14, 1993.
- (d) P. Piet letter to T. Murley, dated February 16, 1993.
- (e) P. Piet letter to W. Russell, dated March 14, 1994.

In Reference (a), the NRC staff requested additional information from Commonwealth Edison (ComEd) to support the review and approval of ComEd's TSUP project. Regarding TSUP Section 3/4.3, the NRC requested further evaluation by ComEd concerning the comparison of current requirements and the proposed TSUP requirements. ComEd submitted TSUP Section 3/4.3, "Reactivity Controls," to the NRC staff on July 29, 1992 (Reference (b). This original submittal was subsequently supplemented by the Reference (c) and Reference (d) submittals. The purpose of this letter is to respond to the NRC staff's RAI for TSUP Section 3/4.3 and supplement the information previously provided in the Reference (b), (c) and (d) submittals. The information provided in this letter (Attachment) provides a line-by-line comparison of current requirements against those proposed in TSUP and provides a discussion explaining the basis of any deviations. The Attachment serves to respond to RAI Generic Question No. 2. Generic Question No. 1 is not applicable to TSUP Section 3/4.3. Other portions of ComEd's response to the RAI regarding other Sections of TSUP will be forthcoming under separate cover.

In Reference (e), ComEd requested complete approval of TSUP by the NRC staff prior to June 30, 1995 in order to fully implement the project at Dresden Station. In order to most effectively implement TSUP at Dresden Station, ComEd's goal is to complete implementation of TSUP at Dresden during October, 1995. The goal for implementation at Quad Cities is February 1996.

It should be noted that the proposed TSUP Section 3/4.3 requirements are consistent to and confirm the current safety analysis as described in the UFSAR. Any changes to the UFSAR necessitated by the approval and implementation of TSUP will be incorporated into the UFSAR, where applicable.

PDR ADDCK 05000237



In order to assist in the review of TSUP Section 3/4.3, Attachment B to this submittal contains marked-up copies of the current Dresden Unit 2 and Quad Cities Unit 2 Technical Specifications. The mark-ups consist of a cross-reference between current Technical Specification requirements against those proposed in TSUP 3/4.3. The mark-ups are not intended to replace or supersede the TSUP pages submitted to the NRC staff in References (b), (c) and (d). As such, these pages have been stamped "For Information Only." In addition, Attachment C to this submittal contains marked-up copies of Section 3/4.1 of the BWR/4 STS. These mark-ups serves as a cross-reference between STS and the proposed TSUP requirements. The mark-ups are not intended to replace or supersede the TSUP pages submitted to the NRC staff in References (b), (c) and (d). As such, these pages have been stamped "For Information Only."

If there are any questions, please contact this office.

$\sim$		-
Sinc	OTO	177
	TCT C	ΙΥ.

Nuclear Licensing Administrator

Attachments:

- A. ComEd Response to Generic Question No. 2
- B. Marked-Up Current Technical Specification Pages
- C. Marked-Up BWR/4 STS Pages
- J. B. Martin, Regional Administrator RIII
- J. F. Stang, Project Manager NRR
- R. M. Pulsifer, Project Manager NRR
- M. N. Leach, Senior Resident Inspector Dresden
- C. G. Miller, Senior Resident Inspector Quad Cities

Office of Nuclear Facility Safety - IDNS

Signed before me on this $\mathcal{L}$	day,	§ OFFICIAL
of May	, 1995.	MARY JO
mary or zort		MY COMMISSION EXE
Notary Public		

## ATTACHMENT A

ComEd Response to TSUP RAI Generic Question No. 2