

May 15, 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 March 26, 1993.  
(c) 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 3/4.9, the NRC requested further evaluation by ComEd concerning the comparison of current requirements and the proposed TSUP requirements. ComEd submitted TSUP Section 3/4.9, "Auxiliary Electrical Systems," to the NRC staff on March 23, 1993 (Reference (b)). The purpose of this letter is to respond to the NRC staff's RAI for TSUP Section 3/4.9 and supplement the information previously provided in the Reference (b) and (c) submittals. The information provided in this letter provides a comprehensive evaluation between current requirements against those proposed in TSUP and provides discussion demonstrating the acceptability of any apparent deviations. Other portions of ComEd's response to the RAI will be forthcoming under separate cover.

Attachment A and B to this letter provides ComEd's response to Generic Question No. 1 (supplemental significant hazards evaluation for TSUP Section 3/4.9) and Generic Question No. 2. Our response to Generic Question No. 2 includes supplemental information regarding proposed TSUP Section 3/4.9 as well as additional information regarding the comparison to current Technical Specifications requirements.

In Reference (c), 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.

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May 15, 1995

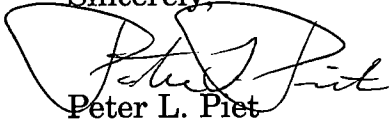
It should be noted that the proposed TSUP Section 3/4.9 requirements are consistent to and confirm the current safety analysis as described in the UFSAR. Any changes to the UFSAR necessitated by the approval and implementation of TSUP will be incorporated into the UFSAR, where applicable.

Attachment C to this letter provides ComEd's response to specific questions raised by the NRC staff in the Reference (a) RAI regarding TSUP Section 3/4.9.

In order to assist in the review of TSUP Section 3/4.9, Attachment D 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 3/4.9. The mark-ups are not intended to replace or supersede the TSUP pages submitted to the NRC staff in Reference (b). As such, these pages have been stamped "For Information Only." In addition, Attachment E to this submittal contains marked-up copies of Section 3/4.8.1 of the BWR/4 STS, where applicable. These mark-ups serve 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 Reference (b). As such, these pages have been stamped "For Information Only."

If there are any questions, please contact this office.

Sincerely,



Peter L. Piet

Nuclear Licensing Administrator

Attachments: A - ComEd Response to Generic Question No. 1  
B - ComEd Response to Generic Question No. 2  
C - Response to RAI Questions for TSUP Section 3/4.9  
D - Marked-Up Current Technical Specification Pages  
E - Marked-Up Draft Revision 4 BWR/4 STS Pages

cc: 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 15<sup>th</sup> day,  
of May, 1995.

Mary Jo Yack  
Notary Public

