Commonwealth Edison Company
1400 Opus Place
Downers Grove, IL 60515

August 3, 1995

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D.C. 20555

ComEd

Subject: Dresden Nuclear Power Station Units 2 and 3
Quad Cities Nuclear Power Station Units 1 and 2
Withdrawal of Supplemental Technical Specification Application; and
Partial Implementation of Technical Specification Amendments 137 and 131 to Facility Operating Licenses DPR-19 and DPR-25 and Amendments 158 and 154 to Facility Operating Licenses DPR-29 and DPR-30
NRC Docket Nos. 50-237/249 and 50-254/265

Reference: (a) P. Piet (ComEd) letter to U.S. NRC, dated July 29, 1992.

(b) J. Schrage (ComEd) letter to U.S. NRC, dated July 19, 1995.

(c) J. Stang letter to D. Farrar (ComEd), dated July 27, 1995.

The purpose of this letter is to formally withdraw the proposed supplemental amendment request, as presented in the Reference (b) letter for Dresden and Quad Cities Stations. With the approval of Reference (a) by the NRC staff (Reference (c)), the Reference (b) request is no longer necessary. As such, ComEd will implement the new Surveillance Requirement (SR) (Technical Specification Upgrade Program [TSUP] SR 4.3.D.3), as 4.3.C.2, prior to August 20, 1995 for Quad Cities Station and prior to August 11, 1995 for Dresden Station.

In order to appropriately control the implementation of the revised Surveillance Requirements, the revised pages (in the current format) provided in Attachment A to the Reference (b) letter will serve as the controlling documentation. These pages are also provided herein. ComEd will implement the remainder of Amendments 137 and 131 for Dresden Station and Amendments 158 and 154 for Quad Cities Station during the full implementation of the Technical Specification Upgrade Program.

If there are any questions regarding this matter, please contact this office.

Sincerely,

Peter L. Piet
Nuclear Licensing Administrator

Attachment: Revised Technical Specification Pages

cc: H. J. Miller, 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

k:\nla\dresden\crdts3.wpf

A Unicom Company

A001

ATTACHMENT

Revised Technical Specification Pages

Dresden Station		Quad Cities Station	
DPR-19	**DPR-25**	**DPR-29**	**DPR-30**
3/4.3-11	**3/4.3-11**	**3.3/4.3-6**	**3.3/4.3-4**
		3.3/4.3-7	**3.3/4.3-5**

k:\nla\dresden\crdts3.wpf

3.3 LIMITING CONDITION FOR OPERATION (Cont'd)	4.3 SURVEILLANCE REQUIREMENT (Cont'd)
2. The maximum scram insertion time for 90 insertion of any operable control rod shall not exceed 7.00 seconds.	2. The maximum scram insertion time of the control rods shall be demonstrated through measurement with reactor coolant pressure greater than 800 psig and, during single control rod scram time tests, with the control rod drive pumps isolated from the accumulators, for at least 10% of the control rods, on a rotating basis, at least once per 120 days of power operation.
	3. Following completion of each set of scram testing as described above, the results shall be compared against the average scram speed distribution used in the transient analysis to verify applicability of the current MCPR Operating Limit. Refer to Specification 3.5.L
D. Control Rod Accumulators	D. Control Rod Accumulators
At all reactor operating pressures, a rod accumulator may be inoperable provided that no other control rod in the nine-rod square array around this rod has a:	Once a shift check the status of the pressure and level alarms for each accumulator.
1. Inoperable accumulator,	
2. Directional control valve electrically disarmed while in a non-fully Inserted position.	

3.3 LIMITING CONDITION FOR OPERATION (Cont'd)	4.3 SURVEILLANCE REQUIREMENT (Cont'd)
2. The maximum scram insertion time for 90 insertion of any operable control rod shall not exceed 7.00 seconds.	2. The maximum scram insertion time of the control rods shall be demonstrated through measurement with reactor coolant pressure greater than 800 psig and, during single control rod scram time tests, with the control rod drive pumps isolated from the accumulators, for at least 10% of the control rods, on a rotating basis, at least once per 120 days of power operation.
	3. Following completion of each set of scram testing as described above, the results shall be compared against the average scram speed distribution used in the transient analysis to verify applicability of the current MCPR Operating Limit. Refer to Specification 3.5.L
D. Control Rod Accumulators	D. Control Rod Accumulators
At all reactor operating pressures, a rod accumulator may be inoperable provided that no other control rod in the nine-rod square array around this rod has a:	Once a shift check the status of the pressure and level alarms for each accumulator.
1. Inoperable accumulator,	
2. Directional control valve electrically disarmed while in a non-fully Inserted position.	

a. Close within 30 seconds after receipt of a signal for control rods to scram, and

b. Open when the scram signal is reset.

C. Scram Insertion Times

1. The average scram insertion time, based on the deenergization of the scram pilot valve solenoids at time zero, of all operable control rods in the reactor power operation condition shall be no greater than:

% Inserted From Fully Withdrawn	Average Scram Insertion Times (sec)
5	0.375
20	0.900
50	2.00
90	3.50

The average of the scram insertion times for the three fastest control rods of all groups of four control rods in a two by two array shall be no greater than:

% Inserted From Fully Withdrawn	Average Scram Times (sec)
5	0.398
20	0.954
50	2.12
90	3.80

2. The maximum scram insertion time for 90% of any operable control rod shall not exceed 7 seconds.

C. Scram Insertion Times

1. After refueling outage and prior to operation above 30% power, with reactor pressure above 800 psig, all control rods shall be subject to scram-time measurements from the fully withdrawn position. The scram times for single rod scram testing shall be measured without reliance on the control rod drive pumps.

2. The maximum scram insertion time of the control rods shall be demonstrated through measurement with reactor coolant pressure greater than 800 psig and, during single control rod scram time tests, with the control rod drive pumps isolated from the accumulators, for at least 10% of the control rods, on a rotating basis, at least once per 120 days of power operation.

3. If Specification 3.3.C.1 cannot be met, the reactor shall not be made supercritical; if operating, the reactor shall be shut down immediately upon determination that average scram time is deficient.

4. If Specification 3.3.C.2 cannot be met, the deficient control rod shall be considered inoperable, fully inserted into the core, and electrically disarmed.

5. If the overall average of the 20% insertion scram time data generated to date in the current cycle exceeds the limit specified in the CORE OPERATING LIMITS REPORT, the MCPR operating limit must be modified as required by Specification 3.5.K.

3. The cycle cumulative mean scram time for 20% insertion will be determined immediately following the testing required in Specifications 4.3.C.1 and 4.3.C.2 and the MCPR operating limit adjusted, if necessary, as required by Specification 3.5.K.

D. Control Rod Accumulators

At all reactor operating pressures, a rod accumulator may be inoperable provided that no other control rod in the nine-rod square array around that rod has:

1. an inoperable accumulator,

D. Control Rod Accumulators

Once a shift, check the status of the pressure and level alarms for each accumulator.

c. the operating power level shall be limited so that the MCPR will remain above the MCPR fuel cladding integrity safety limit assuming a single error that results in complete withdrawal of any single operable control rod.

C. Scram Insertion Times

1. The average scram insertion time. Based on the deenergization of the scram pilot valve solenoids at time zero of all operable control rods in the reactor power operation condition shall be no greater than:

% Inserted From Fully Withdrawn	Average Scram Insertion Times (sec)
5	0.375
20	0.900
50	2.00
90	3.50

The average of the scram insertion times for the three fastest control rods of all groups of four control rods in a two by two array shall be no greater than:

% Inserted From Fully Withdrawn	Average Scram Times (sec)
5	0.398
20	0.954
50	2.12
90	3.80

2. The maximum scram insertion time for 90% insertion of any operable control rods shall not exceed 7 seconds.

3. If Specification 3.3.C.1 cannot be met the reactor shall not be made super-critical: if operating the reactor shall be shut down immediately upon determination that average scram time is deficient.

4. If Specification 3.3.C.2 cannot be met. The deficient control rod shall be con-

C. Scram Insertion Times

1. After refueling outage and prior to operation above 30% power, with reactor pressure above 800 psig, all control rods shall be subject to scram-time measurements from the fully withdrawn position. The scram times for single rod scram testing shall be measured without reliance on the control rod drive pumps.

2. The maximum scram insertion time of the control rods shall be demonstrated through measurement with reactor coolant pressure greater than 800 psig and, during single control rod scram time tests, with the control rod drive pumps isolated from the accumulators, for at least 10% of the control rods, on a rotating basis, at least once per 120 days of power operation.

sidered inoperable, fully inserted into the core and electrically disarmed.

5. If the overall average of the 20% insertion scram time data generated to date in the current cycle exceeds the limit specified in the CORE OPERATING LIMITS REPORT, the MCPR operating limit must be modified as required by Specification 3.5.K.

5. The cycle cumulative mean scram time for 20% insertion will be determined immediately following the testing required in Specifications 4.3.C.1 and 4.3.C.2 and the MCPR operating limit adjusted, if necessary, as required by Specification 3.5.K.

D. Control Rod Accumulators

At all reactor operating pressures, a rod accumulator may be inoperable provided that no other control rod in the nine-rod square array around that rod has:

1. An inoperable accumulator,

2. A directional control valve electrically disarmed while in a nonfully inserted position, or

3. A scram insertion greater than maximum permissible insertion time.

If a control rod with an inoperable accumulator is inserted full-in and its directional control valves are electrically disarmed, it shall not be considered to have an inoperable accumulator, and the rod block associated with that inoperable accumulator may be bypassed.

D. Control Rod Accumulators

Once a shift, check the status of the pressure and level alarms for each accumulator.

E. Reactivity Anomalies

The reactivity equivalent of the difference between the actual critical rod configuration and the expected configuration during power operation shall not exceed 1% Δ k. If this limit is exceeded, the reactor shall be shutdown until the cause has been determined and corrective actions have been taken. In accordance with Specification 6.6, the NRC shall be notified of this reportable occurrence within 24 hours.

E. Reactivity Anomalies

During the startup test program and startups following refueling outages, the critical rod configurations will be compared to the expected configurations at selected operating conditions. These comparisons will be used as base data for reactivity monitoring during subsequent power operation throughout the fuel cycle. At specific power operating conditions, the critical rod configuration will be compared to the configuration expected based upon appropriately corrected past data. This comparison will be made at least every equivalent full power month.

F. Economic Generation Control System

Operation of the unit with the economic generation control system with automatic flow control shall be permissible only in the range of 65% to 100% of rated core flow, with reactor power above 20%.

F. Economic Generation Control System

Prior to entering EGC and once per shift while operating in EGC, the EGC operating parameters will be reviewed for acceptability.