Commonwealth Edison Company
1400 Opus Place
Downers Grove, IL 60515

ComEd

September 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
Supplement to Application for Amendment to Facility Operating Licenses DPR-19, DPR-25, DPR-29 and DPR-30, Appendix A, Technical Specifications for the Technical Specifications Upgrade Program (TSUP)
NRC Docket Nos. 50-237/249 and 50-254/265

References: (see attached)

The purpose of this letter is to close out TSUP open items as identified by the NRC staff's review as noted in NRC staff Safety Evaluations received for previously provided submittals regarding the TSUP project (see attached References). A summary and ComEd's assessment of the proposed changes are provided as Attachment A to this letter. Attachment B highlights the proposed changes and includes marked-up versions of the affected TSUP pages. Attachment C provides revised TSUP pages reflecting the marked-up changes noted in Attachment B. Attachment D provides ComEd's supplemental evaluation of significant hazards considerations for the proposed resolution of the TSUP open items.

The proposed supplemental changes have been approved by Commonwealth Edison's (ComEd) Onsite and Offsite Review in accordance with Company procedures. Commonwealth Edison requests that the proposed changes be approved as submitted to become effective upon completion of the entire TSUP project.

To the best of my knowledge and belief, the statements contained in this document are true and correct. In some respects these statements are not based on my personal knowledge, but on information furnished by other ComEd employees, contractor employees, and/or consultants. Such information has been reviewed in accordance with company practice, and I believe it to be reliable.

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It should be noted that in Reference (a), the NRC staff approved TSUP Section 1.0 and Section 3/4.0 for both Dresden and Quad Cities to be implemented by December 31, 1995. The current implementation schedule at Quad Cities is February 1996. Therefore, ComEd requests change to the implementation schedule for Section 1.0 and Section 3/4.0 for Quad Cities to be changed from December 31, 1995 until June 30, 1996 to allow for any unforeseen changes in the schedule. This proposed change is administrative in nature. Further discussion of this change is provided as an attachment to this letter.

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

Sincerely,

Peter L. Piet
Nuclear Licensing Administrator

Attachment: A. Summary and Assessment of TSUP Clean-Up Changes
B. Marked-Up TSUP Pages
C. Revised TSUP Pages
D. Significant Hazards Evaluation of the Clean-Up Changes

cc: H. J. Miller, Regional Administrator - RIII
J. F. Stang, Project Manager - NRR
R. M. Pulsifer, Project Manager - NRR
C. L. Vanderniet, Senior Resident Inspector - Dresden
C. G. Miller, Senior Resident Inspector - Quad Cities
Office of Nuclear Facility Safety - IDNS

Signed before me on this 15th
day of September, 1995,
by Mary Jo Yack.
Notary Public

OFFICIAL SEAL
MARY JO YACK
NOTARY PUBLIC STATE OF ILLINOIS
MY COMMISSION EXPIRES 11/29/97

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REFERENCES

(a) J. Stang letter to D. Farrar, dated February 16, 1995 (NRC SER for TSUP Sections 1.0 and Section 3/4.0).

(b) J. Stang letter to D. Farrar, dated June 8, 1995 (NRC SER for TSUP Section 3/4.4).

(c) J. Stang letter to D. Farrar, dated June 14, 1995 (NRC SER for TSUP Section 5.0).

(d) J. Stang letter to D. Farrar, dated June 23, 1995 (NRC SER for TSUP Section 3/4.10).

(e) P. Piet letter to T. Murley, dated February 16, 1993 (TSUP Sections 3/4.10).

ATTACHMENT A

Summary and Assessment of TSUP Clean-Up Changes
Dresden and Quad Cities Nuclear Power Stations

No.	PAGES	TSUP SECTION	PLANT/DESCRIPTION
1	3/4.10-8, B 3/4.10-2	3/4.10.F Crane Travel	D/Q - changes to relocate TSUP 3/4.10.F (D/Q) and CTS 3.10.H for Dresden to administrative controls.
2	3/4.10-1, B 3/4.10-3	4.10.B Instrumentation	D/Q - eliminates 4.10.B, footnote (c) which allowed 0.7 cps with a signal-to-noise ratio of 2 for SRMs (vs. the 3 cps requirements).
3	1-5	RPS Response Times	D/Q - Add definition of RPS Response Time consistent with GL 93-08. Pages 1-6 and 1-7 included due to renumeration/shuffling of subsequent definitions.
4	5-1, 5-2, 5-3	Design Features	D/Q - Include text description of Exclusion Area and for the Low Population Zone.
5	License	DPR-29 & DPR-30	Quad Cities - Change implementation date from 12/31/95 until 6/30/96 for TSUP Sections 1.0 and 3/4.0.
6	NRC SER	3/4.4	D/Q - Clarify periodicity of TSUP 4.4.A.3.

ATTACHMENT A

1. 3/4.10.F Crane Travel - Spent Fuel Storage Pool - In the NRC staff's Safety Evaluation Report (SER) for TSUP 3/4.10, "Refueling," dated June 23, 1995 (Reference (d)), Section 3.6 of the SER discussed TSUP 3/4.10.F, Crane Travel. The SER stated that a revised version of 3/4.10.F would be based on STS 3/4.9.7 and incorporate the loadings of the current TS (CTS 3.10.H for Dresden) requirements (loads no heavier than the weight of a single fuel assembly and handling tool). STS 4.9.7 provides the following guidelines: "Crane interlocks and physical stops which prevent crane travel with loads in excess of (1100) pounds over fuel assemblies in the spent fuel storage pool racks shall be demonstrated OPERABLE within 7 days prior to and at least once per 7 days during crane operation." The current Dresden and Quad Cities refueling crane/bridge design does not include such interlocks; as such, the prevention of transport of loads heavier than the weight of a single spent fuel assembly and handling tool are administratively controlled. Therefore, ComEd proposes that the requirements to control loads heavier than the weight of a single spent fuel assembly and handling tool be relocated to administrative controls. It should be noted that the proposed changes are consistent with the requirements of the Improved Standard Technical Specifications (NUREG-1433). Because administrative controls will continue to be enforced regarding the transport of loads heavier than the weight of a single spent fuel assembly and handling tool, existing plant safety margins are maintained. Therefore, ComEd considers this open item from the NRC staff's SER for TSUP 3/4.10 (Reference (d)) closed.

2. 4.10.B Instrumentation - This issue is applicable to both Dresden and Quad Cities and eliminates the proposed TSUP footnote (c) to SR 4.10.B which allowed 0.7 cps with a signal-to-noise (s/n) ratio of 2 for SRM operability. It should be noted that this issue was listed as an open item in the NRC staff's SER for TSUP 3/4.10 (Reference (d)). This change conservatively eliminates a less restrictive requirement from the proposed TSUP Section 4.10.B and is acceptable and consistent to the current licensing basis for Dresden and Quad Cities Stations. Therefore, ComEd considers this open item from the NRC staff's SER for TSUP 3/4.10 (Reference (d)) closed.

3. 1.0 REACTOR PROTECTION SYSTEM (RPS) RESPONSE TIMES - To be consistent with the requirements of NUREG-0123, Dresden and Quad Cities are including the plant-specific definitions for REACTOR PROTECTION SYSTEM RESPONSE TIMES to Section 1.0 of TSUP. It should be noted that this issue was listed as an open item in the NRC staff's SER for TSUP 1.0 (Reference (a)). The existing definition for the Reactor Protection System response times from current Technical Specification 3.1.A.1 has been adopted in TSUP Section 1.0 as the Dresden and Quad Cities definition. To be consistent with the intention of Generic Letter 93-08, "Guidance for a Proposed License Amendment to Relocate Tables of Instrument Response Time Limits from Technical Specifications to the Updated Final Safety Analysis Report," any reference to specific instrumentation response shall be controlled within the UFSAR. As such, the proposed definition does not included specific time requirements. The change is equivalent to the current licensing basis for Dresden

and Quad Cities; therefore, there is no reduction in existing plant safety margins. Therefore, ComEd considers this open item from the NRC staff's SER for TSUP 1.0 (Reference (a)) closed.

4. 5.1 Design Features - Site - This issue is a proposed resolution to TSUP open item 3.9.1 and 3.9.2 of the NRC staff's SER for TSUP 5.0 (Reference (c)). The proposed clean-up package does not include figures for the Site Low Population Area and Exclusion Zone. ComEd proposed that information intended to be provided graphically in the figures are more properly controlled through the proposed TSUP textual description of this submittal. Any changes to the locations of the meteorological tower or effluent discharge points must conform to the requirements of 10 CFR 50.59. Furthermore, sufficient detail relating to these features exists in LCOs to ensure any changes which may affect safety require prior NRC review and approval. Features with a potential to affect safety are sufficiently addressed by LCOs. The proposed changes are administrative in nature as the proposed textual descriptions are the same as that found in the site UFSAR, therefore, the current licensing basis remains unchanged and the proposed clean-up changes are acceptable for TSUP 5.1. Therefore, ComEd considers the open items 3.9.1 and 3.9.2 from the NRC staff's SER for TSUP 5.0 (Reference (c)) closed.

5. Implementation Schedule - In Reference (a), the NRC staff approved TSUP Section 1.0 and Section 3/4.0 for both Dresden and Quad Cities to be implemented by December 31, 1995. The current implementation schedule at Quad Cities, however, is February, 1996. To allow some margin for unforeseen changes in the implementation schedule, therefore, ComEd requests a change to the implementation schedule for Section 1.0 and Section 3/4.0 for Quad Cities from December 31, 1995 until June 30, 1996. This proposed change is administrative in nature and does not adversely affect existing plant safety margins.

6. 3/4.4 NRC SER - In Reference (b), the NRC staff discussed the current test frequency for SBLC pumps (40 gpm per pump at 1275 psig) in TSUP 4.4.A.3 to be once every 31 days. As discussed in Attachment 5 of Reference (e), TSUP 4.4.A.3 replaced the current Technical Specification (CTS 4.4.A.1) monthly pump runs with quarterly (every 92 days) Inservice Testing (IST) provisions. These quarterly tests are in use at Dresden and Quad Cities and based upon experience, have adequately demonstrated system capabilities and availability. Therefore, TSUP 4.4.A.3 changes the frequency of the pump tests from every 31 days to every 92 days to be consistent with Dresden and Quad Cities IST program. Revisions to the IST program are controlled by the requirements of 10 CFR 50.55a. 10 CFR 50.55a provides sufficient controls to ensure the SBLC system pumps are adequately tested. Because the SBLC pumps are encompassed by the provisions of the IST program, existing plant safety margins are not significantly reduced by the proposed changes.

ATTACHMENT B

MARKED-UP TSUP PAGES
DRESDEN AND QUAD CITIES NUCLEAR POWER STATIONS
LICENSE NOS. DPR-19, DPR-25, DPR-29 AND DPR-30

Page	Applicable Plant
1-5	Dresden & Quad Cities
3/4.10-3	Dresden & Quad Cities
3/4.10-8	Dresden & Quad Cities
B 3/4.10-1	Dresden & Quad Cities
B 3/4.10-2	Dresden & Quad Cities
5-1	Dresden & Quad Cities
5-2	Dresden & Quad Cities
5-3	Dresden & Quad Cities