#### PRIMARY CONTAINMENT INTEGRITY (PCI)

PRIMARY CONTAINMENT INTEGRITY (PCI) shall exist when:

- a. All primary containment penetrations required to be closed during accident conditions are either:
  - 1) Capable of being closed by an OPERABLE primary containment automatic isolation valve system, or
  - 2) Closed by at least one manual valve, blind flange, or deactivated automatic valve secured in its closed position, except for valves that are open under administrative control as permitted by Specification 3.7.D.
- b. All primary containment equipment hatches are closed and sealed.
- c. Each primary containment air lock is in compliance with the requirements of Specification 3.7.C.
- d. The primary containment leakage rates are within the limits of Specification 3.7.B.
- e. The suppression chamber is in compliance with the requirements of Specification 3.7.K.
- f. The sealing mechanism associated with each primary containment penetration; e.g., welds, bellows or O-rings, is OPERABLE.

#### PROCESS CONTROL PROGRAM (PCP)

The PROCESS CONTROL PROGRAM (PCP) shall contain the current formulas, sampling, analysis, test, and determinations to be made to ensure that processing and packaging of solid radioactive wastes based on demonstrated processing of actual or simulated wet solid wastes will be accomplished in such a way as to assure compliance with 10 CFR Parts 20, 61, and 71, State regulations, burial ground requirements, and other requirements governing the disposal of solid radioactive waste.

#### RATED THERMAL POWER (RTP)

RATED THERMAL POWER (RTP) shall be a total reactor core heat transfer rate to the reactor coolant of 2527 MWT.

#### REPORTABLE EVENT

-18

A REPORTABLE EVENT shall be any of those conditions specified in Section 50.73 to 10 CFR Part 50.

REACTOR PROTECTION SYSTEM (RAS) RESPONSE TIME

PDR

REACTOR PROTECTION SYSTEM (RPS) RESPONSE TIME shall be the time interval for each trip function from the opening of the sensor contact up to and including the opening of the trip actuator.

DRESDEN - UNITS 2 & 3

PDR

9509190383 950915

ADOCK 05000237

1-5

#### REFUELING OPERATIONS

Instrumentation 3/4.10.B

#### 3.10 - LIMITING CONDITIONS FOR OPERATION

#### B. Instrumentation

At least 2 source range monitor<sup>(a)</sup> (SRM) CHANNEL(s) shall be OPERABLE and inserted to the normal operating level with:

- 1. Continuous visual indication in the control room,
- 2. One of the required SRM detectors located in the quadrant where CORE ALTERATION(s) are being performed and the other required SRM detector located in an adjacent quadrant, and
- Unless adequate SHUTDOWN MARGIN has been demonstrated per Specification 3.3.A and the "one-rodout" Refuel position interlock has been demonstrated OPERABLE per Specification 3.10.A, the "shorting links" shall be removed from the RPS circuitry prior to and during the time any control rod is withdrawn<sup>(b)</sup>.

#### APPLICABILITY:

OPERATIONAL MODE 5, unless the following conditions are met:

 No more than two fuel assemblies are present in each core quadrant associated with an SRM;

#### 4.10 - SURVEILLANCE REQUIREMENTS

#### B. Instrumentation

Each of the required SRM channels shall be demonstrated OPERABLE by:

- 1. At least once per 12 hours:
  - a. Performance of a CHANNEL CHECK.
  - b. Verifying the detectors are inserted to the normal operating level, and
  - c. During CORE ALTERATION(s), verifying that the detector of an OPERABLE SRM CHANNEL is located in the core quadrant where CORE ALTERATION(s) are being performed and another is located in an adjacent quadrant.
- 2. Performance of a CHANNEL FUNCTIONAL TEST:
  - a. Within 24 hours prior to the start of CORE ALTERATION(s), and
  - b. At least once per 7 days.
- 3. Verifying that the channel count rate is at least 3 cps.
  - a. Prior to control rod withdrawal,
  - b. Prior to and at least once per 12 hours during CORE ALTERATION(s),
  - c. At least once per 24 hours.

Amendment Nos. 136 & 130

0

a The use of special movable detectors during CORE ALTERATION(s) in place of the normal SRM neutron detectors is permissible as long as these special detectors are connected to the normal SRM circuits.

b Not required for control rods removed per Specification 3.10.1 and 3.10.J

#### **REFUELING OPERATIONS**



# 3.10 - LIMITING CONDITIONS FOR OPERATION

# F. (Grane Trave)

All movements of a spent fuel shipping cask above the 545 foot elevation of the Reactor Building shall be controlled by the "Restricted Mode" path control system of the reactor building crane.

# APPLICABILITY:

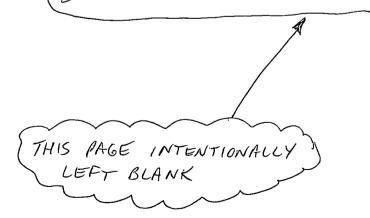
At all times.

# ACTION:

With the requirements of the above specification not satisfied:

- Operation may continue with a failed controlled area limit switch for 48 hours provided an operator is on the refueling floor to assure the reactor building crane is operated within the restricted zone painted on the floor, or
- 2. Place the crane load in a safe condition.

The provisions of Specification 3.0.C are not applicable.



# 4.10 - SURVEILLANCE REQUIREMENTS

- F. Grane Travel
  - The spent fuel shipping cask
     "Restricted Mode" path control system
     of the reactor building crane shall be
     demonstrated OPERABLE within 7 days
     prior to and at least once per 7 days
     during spent fuel shipping cask
     movement over the refueling floor.
  - The redundant crane including the rope, hooks, slings, shackles and other operating mechanisms shall be inspected prior to spent fuel shipping cask handling operations and the rope will be replaced if any of the following conditions exist:
    - a. Twelve randomly distributed broken wires in one lay or four broken wires in one strand of one rope lay.
    - b. Wear of one-third of the original diameter of outside individual wire.
    - c. Kinking, crushing, or any other damage resulting in distortion of the tope.
    - d. Evidence of any type of heat damage.
    - e. Reductions from nominal diameter of more than 1/16 inch for a rope diameter from 7/8 inch to 1-1/4 inch inclusive.
  - The spent fuel cask will be lifted free of all support by a maximum of 1 foot and left hanging for 5 minutes prior to spent fuel cask handling operations.

#### 3/4.10.A Reactor Mode Switch

Locking the OPERABLE reactor mode switch in the Shutdown or Refuel position, as specified, ensures that the restrictions on control rod withdrawal and refueling platform movement during the refueling operations are properly activated. These conditions reinforce the refueling procedures and reduce the probability of inadvertent criticality, damage to reactor internals or fuel assemblies, and exposure of personnel to excessive radioactivity.

The addition of large amounts of reactivity to the core is prevented by operating procedures, which are in turn backed up by refueling interlocks on rod withdrawal and movement of the refueling platform. When the mode switch is in the Refuel position, interlocks prevent the refueling platform from being moved over the core if a control rod is withdrawn and fuel is on a hoist. If the refueling platform is over the core with fuel on a hoist, control rod motion is blocked by the interlocks. With the mode switch in the refuel position only one control rod can be withdrawn.

#### <u>3/4.10.B</u> Instrumentation

The OPERABILITY of at least two source range monitors ensures that redundant monitoring capability is available to detect changes in the reactivity condition of the core, whenever reactor criticality is possible.

The source range monitors (SRM) are provided to monitor the core during periods of station shutdown and to guide the operator during refueling operations and reactor startup. Requiring two OPERABLE source range monitors in and adjacent to any core quadrant where fuel or control rods are being moved assures adequate monitoring of that quadrant during such alterations. Requiring a minimum of 3 counts per second whenever criticality is possible provides assurance that neutron flux is being monitored. The SRM system is designed to provide a signal-to-noise ratio of at least 3:1 and a count rate of at least 3 counts per second. For a signal-to-noise ratio of 2:1, the count rate must be at least 0.7 counts per second. Criticality is considered to be impossible if there are no more than two assemblies in a quadrant and if these are in locations adjacent to the source range monitors (i.e., spatially separated).

Special movable detectors may be used during CORE ALTERATION(s) in place of the normal SRM neutron detectors. These special detectors must be connected to the normal SRM circuits such that the applicable neutron flux indication, control rod blocks and scram signals can be generated. The special detectors provide more flexibility in monitoring reactivity changes during fuel loading since they can be positioned anywhere within the core during refueling provided they meet the location requirements of the specification.

When the Reactor Protection System shorting links are removed, the source range monitors provide added protection against local criticalities by providing an initiating signal for a reactor scram on high neutron flux.

3

#### <u>3/4.10.C</u> Control Rod Position

The requirement that all control rods be inserted during other CORE ALTERATION(s) ensures that fuel will not be loaded into a cell without an inserted control rod.

#### <u>3/4.10.D</u> Decay Time

The minimum requirement for reactor subcriticality prior to fuel movement ensures that sufficient time has elapsed to allow the radioactive decay of the short lived fission products. This decay time is consistent with the assumptions used in the accident analyses.

#### 3/4.10.E Communications

The requirement for communications capability ensures that refueling station personnel can be promptly informed of significant changes in the facility status regarding core reactivity conditions during movement of fuel within the reactor pressure vessel.

The operation of the reactor building crane in the Restricted Mode during spent fuel shipping cask handling operations, assures that the cask remains within the controlled area once it has been removed from its transport vehicle. The surveillance requirements specified assure that the crane is adequately inspected in accordance with the accepted ANSI Standard (B-30.2.0) and the manufacturer's recommendations to determine that the equipment is in satisfactory condition. The testing of the controlled area limit switches assures that the crane operation will be limited to the designated area in the Restricted Mode of operation. Requiring the lifting and holding of the cask for 5 minutes during the initial lift of eask handling operations puts a load test on the entire crane lifting mechanism as well as the braking system. Performing this test when the cask is being lifted initially assures that the system is OPERABLE prior to lifting the load to excessive height.

#### 3/4.10.G Water Level - Reactor Vessel

#### 3/4.10.H Water Level - Spent Fuel Storage Pool

The restrictions on minimum water level ensure that sufficient water depth is available to remove 99% of the assumed 10% iodine gap activity released from the rupture of an irradiated fuel assembly. This minimum water depth is consistent with the assumptions of the accident analysis.

#### 5.0 DESIGN FEATURES

<u>5.1</u>	SITE Site end Exclusion Area	
ć	(IINTENTIONALLY BLANK)	
	5.1.A (INTENTIONALLY BLANKI) (INSERT)	
	Low Population Zone	a five mile
	5.1.B The low population zone shall be as shown in Figure 5.1.B-1.	radius from the centerline of the chimney.
	Radioactive Gaseous Effluents	chimney.

5.1.C Information regarding radioactive gaseous effluents shall be located in the OFFSITE DOSE CALCULATION MANUAL.

#### Radioactive Liquid Effluents

5.1.D Information regarding radioactive liquid effluents shall be located in the OFFSITE DOSE CALCULATION MANUAL.

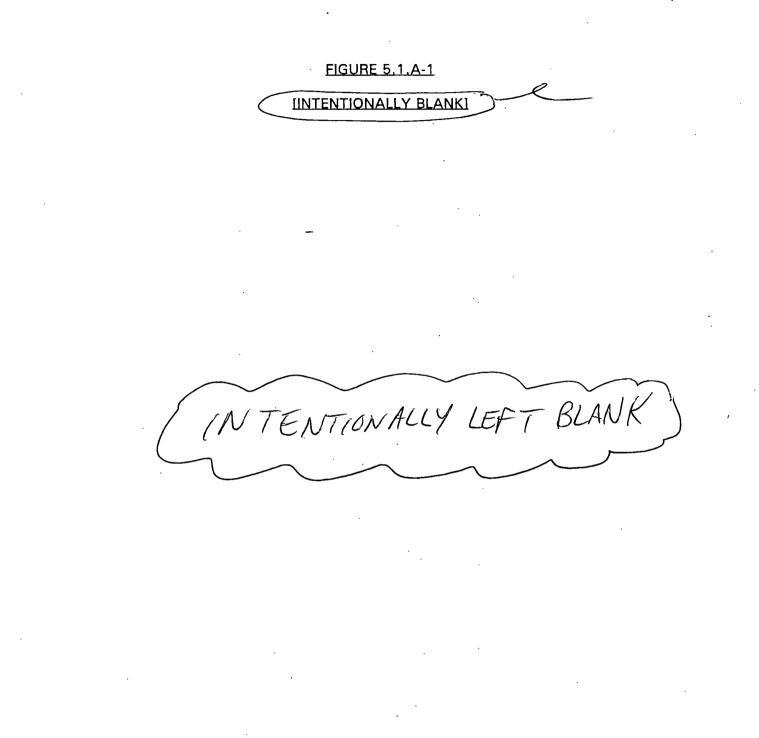
#### DRESDEN - UNITS 2 & 3

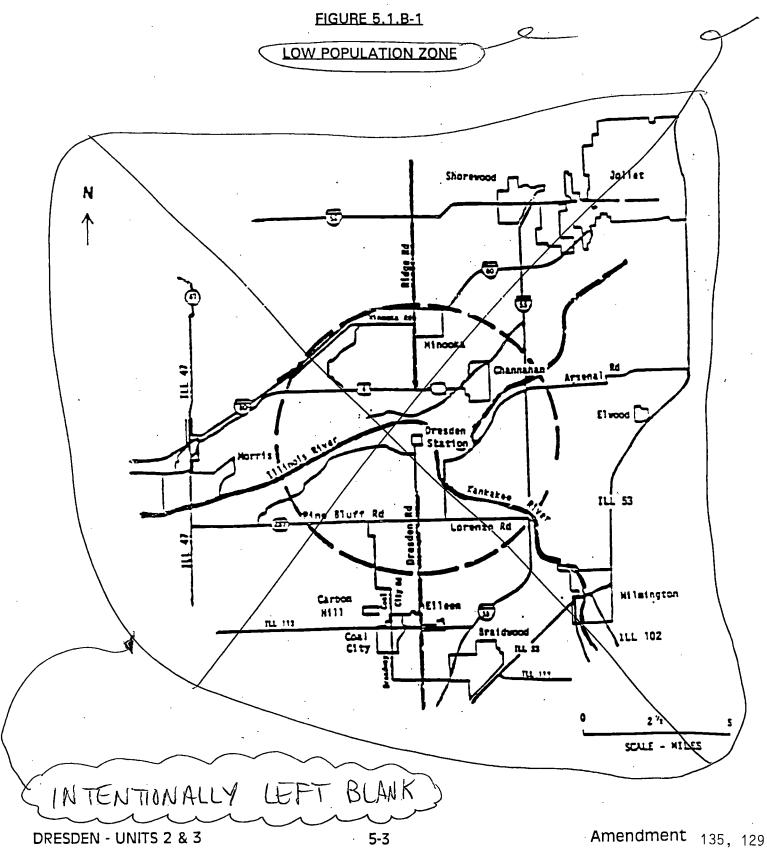
## **Amendment** 135, 129

# INSERT

The site consists of approximately 953 acres adjacent to the Illinois River at the point where it is formed by the confluence of the Des Plaines and Kankakee Rivers, in the northeast quarter of the Goose Lake Township, Grundy County, Illinois. The Exclusion Area shall not be less than 800 meters from the centerline of the reactor vessels.

.





1

#### **1.0 DEFINITIONS**

#### PRIMARY CONTAINMENT INTEGRITY (PCI)

PRIMARY CONTAINMENT INTEGRITY (PCI) shall exist when:

- a. All primary containment penetrations required to be closed during accident conditions are either:
  - 1) Capable of being closed by an OPERABLE primary containment automatic isolation valve system, or
  - Closed by at least one manual valve, blind flange, or deactivated automatic valve secured in its closed position, except for valves that are open under administrative control as permitted by Specification 3.7.D.
- b. All primary containment equipment hatches are closed and sealed.
- c. Each primary containment air lock is in compliance with the requirements of Specification 3.7.C.
- d. The primary containment leakage rates are within the limits of Specification 3.7.B.
- e. The suppression chamber is in compliance with the requirements of Specification 3.7.K.
- f. The sealing mechanism associated with each primary containment penetration; e.g., welds, bellows or O-rings, is OPERABLE.

#### PROCESS CONTROL PROGRAM (PCP)

The PROCESS CONTROL PROGRAM (PCP) shall contain the current formulas, sampling, analysis, test, and determinations to be made to ensure that processing and packaging of solid radioactive wastes based on demonstrated processing of actual or simulated wet solid wastes will be accomplished in such a way as to assure compliance with 10 CFR Parts 20, 61, and 71, State regulations, burial ground requirements, and other requirements governing the disposal of solid radioactive waste.

#### RATED THERMAL POWER (RTP)

RATED THERMAL POWER (RTP) shall be a total reactor core heat transfer rate to the reactor coolant of 2511 MWT.

#### REPORTABLE EVENT

A REPORTABLE EVENT shall be any of those conditions specified in Section 50.73 to 10 CFR Part 50.

#### ROD DENSITY

ROD DENSITY shall be the number of control rod notches inserted as a fraction of the total number of control rod notches. All rods fully inserted is equivalent to 100% ROD DENSITY.

QUAD CITIES - UNITS 1 & 2

1-5

Amendment Nos. 152 & 148

REACTOR PROTECTION SYSTEM (RPS) RESPONSE TIME

REPLETOR PROTECTION SYSTEM (RPS) RESPONSE TIME shall be the time interval for each trip function from the opening of the sensor contact up to and including the opening of the trip actuator.

#### REFUELING OPERATIONS

#### 3.10 - LIMITING CONDITIONS FOR OPERATION

B. Instrumentation

At least 2 source range monitor<sup>(a)</sup> (SRM) CHANNEL(s) shall be OPERABLE and inserted to the normal operating level with:

- 1. Continuous visual indication in the control room,
- 2. One of the required SRM detectors located in the quadrant where CORE ALTERATION(s) are being performed and the other required SRM detector located in an adjacent quadrant, and
- Unless adequate SHUTDOWN MARGIN has been demonstrated per Specification 3.3.A and the "one-rodout" Refuel position interlock has been demonstrated OPERABLE per Specification 3.10.A, the "shorting links" shall be removed from the RPS circuitry prior to and during the time any control rod is withdrawn<sup>(b)</sup>.

#### **APPLICABILITY:**

OPERATIONAL MODE 5, unless the following conditions are met:

 No more than two fuel assemblies are present in each core quadrant associated with an SRM;

#### 4.10 - SURVEILLANCE REQUIREMENTS

#### B. Instrumentation

Each of the required SRM channels shall be demonstrated OPERABLE by:

- 1. At least once per 12 hours:
  - a. Performance of a CHANNEL CHECK.
  - b. Verifying the detectors are inserted to the normal operating level, and
  - c. During CORE ALTERATION(s), verifying that the detector of an OPERABLE SRM CHANNEL is located in the core quadrant where CORE ALTERATION(s) aro being performed and another is located in an adjacent quadrant.
- 2. Performance of a CHANNEL FUNCTIONAL TEST:
  - a. Within 24 hours prior to the start of CORE ALTERATION(s), and
  - b. At least once per 7 days.
- 3. Verifying that the channel count rate is at least 3 cps.
  - a. Prior to control rod withdrawal,
  - b. Prior to and at least once per 12 hours during CORE ALTERATION(s),
  - c. At least once per 24 hours.

QUAD CITIES - UNITS 1 & 2

a The use of special movable detectors during CORE ALTERATION(s) in place of the normal SRM neutron detectors is permissible as long as these special detectors are connected to the normal SRM circuits.

b Not required for control rods removed per Specification 3.10.1 and 3.10.J

G May be reduced to 0.7 cps provided signal to noise ratio is greater than or equal to 2.0

#### **REFUELING OPERATIONS**

DELETED

Crane Travel 3/4.10.F

# 3.10 - LIMITING CONDITIONS FOR OPERATION

# F. Crane Travel

All movements of a spent fuel shipping cask above the 623 foot elevation of the Reactor Building shall be controlled by the "Restricted Mode" path control system of the reactor building crane.

# APPLICABILITY;

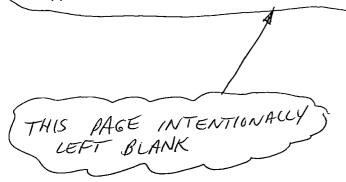
At all times.

# ACTION:

With the requirements of the above specification not satisfied:

- Operation may continue with a failed controlled area limit switch for 48 hours provided an operator is on the refueling floor to assure the reactor building crane is operated within the restricted zone painted on the floor, or
- 2. Place the crane load in a safe condition.

The provisions of Specification 3.0.C are not applicable.



#### 4.10 - SURVEILLANCE REQUIREMENTS

- F. Grane Travel
  - The spent fuel shipping cask
     "Restricted Mode" path control system
     of the reactor building crane shall be
     demonstrated OPERABLE within 7 days
     prior to and at least once per 7 days
     during spent fuel shipping cask
     movement above the 623 foot
     elevation of the reactor building.
  - The redundant crane including the rope, hooks, slings, shackles and other operating mechanisms shall be inspected prior to spent fuel shipping cask handling operations and the rope Will be replaced if any of the following conditions exist:
    - a. Twelve randomly distributed broken wires in one lay or four broken wires in one strand of one rope lay.
    - b. Wear of one-third of the original diameter of outside individual wire.
    - Kinking, crushing, or any other damage resulting in distortion of the rope.
    - d. Evidence of any type of heat damage.
    - e. Reductions from nominal diameter of more than 1/16 inch for a rope diameter from 7/8 inch to 1-1/4 inch inclusive.
    - The spent fuel cask will be lifted free of all support by a maximum of 1 foot and left hanging for 5 minutes prior to spent fuel cask handling operations.

#### QUAD CITIES - UNITS 1 & 2

#### 3/4.10.A Reactor Mode Switch

Locking the OPERABLE reactor mode switch in the Shutdown or Refuel position, as specified, ensures that the restrictions on control rod withdrawal and refueling platform movement during the refueling operations are properly activated. These conditions reinforce the refueling procedures and reduce the probability of inadvertent criticality, damage to reactor internals or fuel assemblies, and exposure of personnel to excessive radioactivity.

The addition of large amounts of reactivity to the core is prevented by operating procedures, which are in turn backed up by refueling interlocks on rod withdrawal and movement of the refueling platform. When the mode switch is in the Refuel position, interlocks prevent the refueling platform from being moved over the core if a control rod is withdrawn and fuel is on a hoist. If the refueling platform is over the core with fuel on a hoist, control rod motion is blocked by the interlocks. With the mode switch in the refuel position only one control rod can be withdrawn.

## <u>3/4.10.B</u> Instrumentation

The OPERABILITY of at least two source range monitors ensures that redundant monitoring capability is available to detect changes in the reactivity condition of the core, whenever reactor criticality is possible.

The source range monitors (SRM) are provided to monitor the core during periods of station shutdown and to guide the operator during refueling operations and reactor startup. Requiring two OPERABLE source range monitors in and adjacent to any core quadrant where fuel or control rods are being moved assures adequate monitoring of that quadrant during such alterations. Requiring a minimum of 3 counts per second whenever criticality is possible provides assurance that neutron flux is being monitored. The SRM system is designed to provide a signal-to-noise ratio of at least 3:1 and a count rate of at least 3 counts per second. (For a signal-to-noise ratio of -2:1, the count) rate must be at least 0.7 counts per second. Criticality is considered to be impossible if there are no more than two assemblies in a quadrant and if these are in locations adjacent to the source range monitors (i.e., spatially separated).

Special movable detectors may be used during CORE ALTERATION(s) in place of the normal SRM neutron detectors. These special detectors must be connected to the normal SRM circuits such that the applicable neutron flux indication, control rod blocks and scram signals can be generated. The special detectors provide more flexibility in monitoring reactivity changes during fuel loading since they can be positioned anywhere within the core during refueling provided they meet the location requirements of the specification.

When the Reactor Protection System shorting links are removed, the source range monitors provide added protection against local criticalities by providing an initiating signal for a reactor scram on high neutron flux.

#### 3/4.10.C Control Rod Position

The requirement that all control rods be inserted during other CORE ALTERATION(s) ensures that fuel will not be loaded into a cell without an inserted control rod.

#### <u>3/4.10.D</u> Decay Time

The minimum requirement for reactor subcriticality prior to fuel movement ensures that sufficient time has elapsed to allow the radioactive decay of the short lived fission products. This decay time is consistent with the assumptions used in the accident analyses.

#### <u>3/4.10.E</u> <u>Communications</u>

The requirement for communications capability ensures that retueling station personnel can be promptly informed of significant changes in the facility status regarding core reactivity conditions during movement of fuel within the reactor pressure vessel.

The operation of the reactor building crane in the Restricted Mode during spent fuel shipping eask handling operations assures that the cask remains within the controlled area once it has been removed from its transport vehicle. The surveillance requirements specified assure that the crane is adequately inspected in accordance with the accepted ANSI-Standard (B.30.2.0) and the manufacturer's recommendations to determine that the equipment is in satisfactory condition. The testing of the controlled area limit switches assures that the crane operation will be limited to the designated area in the Restricted Mode of operation. Requiring the lifting and holding of the cask for 5 minutes during the initial lift of cask handling operations puts a load test on the entire crane lifting mechanism as well as the braking system. Performing this test when the cask is being lifted initially assures that the system is OPERABLE prior to lifting the load to excessive height.

#### 3/4.10.G Water Level - Reactor Vessel

#### <u>3/4.10.H</u> Water Level - Spent Fuel Storage Pool

The restrictions on minimum water level ensure that sufficient water depth is available to remove 99% of the assumed 10% iodine gap activity released from the rupture of an irradiated fuel assembly. This minimum water depth is consistent with the assumptions of the accident analysis.

0

# SITE 5.1

5.0	DESIGN FEATURES
5.1 SITE	
	ENTIONALLY BLANKI
. 5.1.	A (INTENTIONALLY BLANK) (INSER 7 )
Low	Population Zone
5.1.	B The low population zone shall be as shown in Figure 5.1.B-1 (From the centerline) of the chimney.
<u>Radi</u>	oactive Gaseous Effluents
5.1.	C Information regarding radioactive gaseous effluents shall be located in the OFFSITE

Radioactive Liquid Effluents

DOSE CALCULATION MANUAL.

5.1.D Information regarding radioactive liquid effluents shall be located in the OFFSITE DOSE CALCULATION MANUAL.

# QUAD CITIES - UNITS 1 & 2

# INSERT

The site consists of approximately 784 acres on the east bank of the Mississippi River opposite the mouth of the Wapsipinicon River, approximately three miles north of the village of Cordova, Rock Island County, Illinois. The Exclusion Area shall not be less than 380 meters from the centerline of the chimney.

,

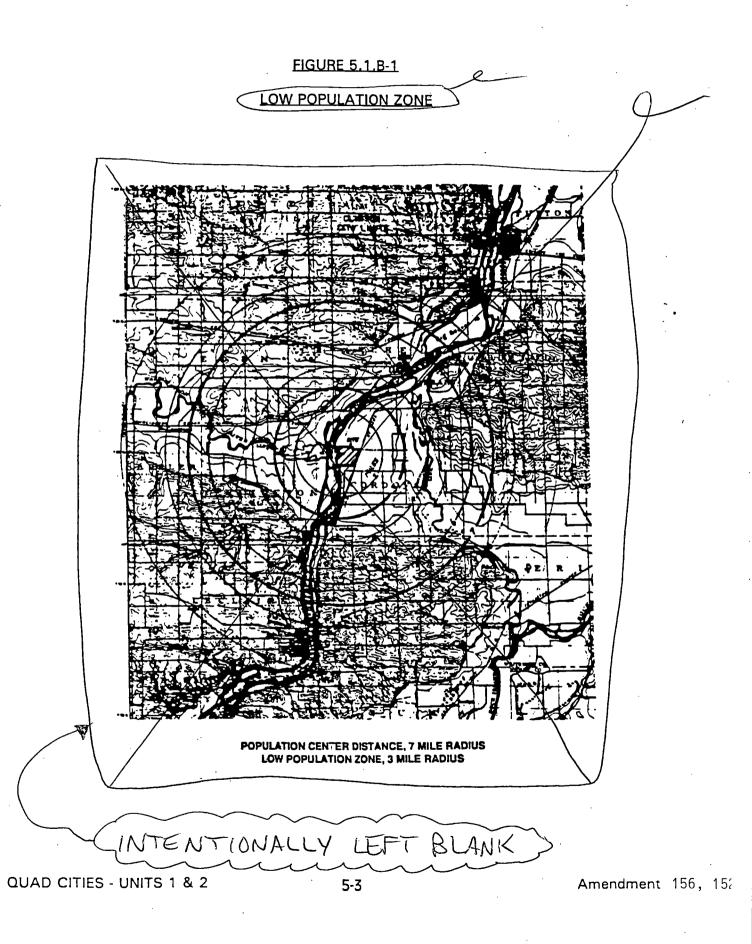
۲

¢

FIGURE 5.1.A-1 IINTENTIONALLY BLANKI

INTENTIONALLY LEFT BLANK

QUAD CITIES - UNITS 1 & 2



# ATTACHMENT C

## REVISED TSUP PAGES FOR DRESDEN AND QUAD CITIES NUCLEAR POWER STATIONS LICENSE NOS. DPR-19, DPR-25, DPR-29, AND DPR-30

c:\tsup\cleanest.wpf

۰.

. .

#### PRIMARY CONTAINMENT INTEGRITY (PCI)

PRIMARY CONTAINMENT INTEGRITY (PCI) shall exist when:

- a. All primary containment penetrations required to be closed during accident conditions are either:
  - 1) Capable of being closed by an OPERABLE primary containment automatic isolation valve system, or
  - 2) Closed by at least one manual valve, blind flange, or deactivated automatic valve secured in its closed position, except for valves that are open under administrative control as permitted by Specification 3.7.D.
- b. All primary containment equipment hatches are closed and sealed.
- c. Each primary containment air lock is in compliance with the requirements of Specification 3.7.C.
- d. The primary containment leakage rates are within the limits of Specification 3.7.B.
- e. The suppression chamber is in compliance with the requirements of Specification 3.7.K.
- f. The sealing mechanism associated with each primary containment penetration; e.g., welds, bellows or O-rings, is OPERABLE.

#### PROCESS CONTROL PROGRAM (PCP)

The PROCESS CONTROL PROGRAM (PCP) shall contain the current formulas, sampling, analysis, test, and determinations to be made to ensure that processing and packaging of solid radioactive wastes based on demonstrated processing of actual or simulated wet solid wastes will be accomplished in such a way as to assure compliance with 10 CFR Parts 20, 61, and 71, State regulations, burial ground requirements, and other requirements governing the disposal of solid radioactive waste.

#### RATED THERMAL POWER (RTP)

RATED THERMAL POWER (RTP) shall be a total reactor core heat transfer rate to the reactor coolant of 2527 MWT.

#### REACTOR PROTECTION SYSTEM (RPS) RESPONSE TIME

REACTOR PROTECTION SYSTEM (RPS) RESPONSE TIME shall be the time interval for each trip function from the opening of the sensor contact up to and including the opening of the trip actuator.

#### REPORTABLE EVENT

A REPORTABLE EVENT shall be any of those conditions specified in Section 50.73 to 10 CFR Part 50.

#### SECONDARY CONTAINMENT INTEGRITY (SCI)

SECONDARY CONTAINMENT INTEGRITY (SCI) shall exist when:

- a. All secondary containment penetrations required to be closed during accident conditions are either:
  - 1) Capable of being closed by an OPERABLE secondary containment automatic isolation valve system, or
  - 2) Closed by at least one manual valve, blind flange, or deactivated automatic damper secured in its closed position, except as permitted by Specification 3.7.0.
- b. All secondary containment hatches and blowout panels are closed and sealed.
- c. The standby gas treatment system is in compliance with the requirements of Specification 3.7.P.
- d. At least one door in each access to the secondary containment is closed.
- e. The sealing mechanism associated with each secondary containment penetration; e.g., welds, bellows or O-rings, is OPERABLE.
- f. The pressure within the secondary containment is less than or equal to the value required by Specification 4.7.N.1.

#### SHUTDOWN MARGIN (SDM)

SHUTDOWN MARGIN (SDM) shall be the amount of reactivity by which the reactor is subcritical or would be subcritical assuming all control rods are fully inserted except for the single control rod of highest reactivity worth which is assumed to be fully withdrawn and the reactor is in the shutdown condition; cold, i.e. 68°F; and xenon free.

#### SOURCE CHECK

A SOURCE CHECK shall be the qualitative assessment of CHANNEL response when the CHANNEL sensor is exposed to a radioactive source.

#### STEADY STATE LINEAR HEAT GENERATION RATE (SLHGR)

The STEADY STATE LINEAR HEAT GENERATION RATE (SLHGR) shall be the limit which protects against exceeding the fuel end-of-life steady state design criteria.

#### THERMAL POWER

THERMAL POWER shall be the total reactor core heat transfer rate to the reactor coolant.

#### TRANSIENT LINEAR HEAT GENERATION RATE (TLHGR)

The TRANSIENT LINEAR HEAT GENERATION RATE (TLHGR) shall be the limit which protects against fuel centerline melting and 1% plastic cladding strain during transient conditions throughout the life of the fuel.

#### TRIP SYSTEM

A TRIP SYSTEM shall be an arrangement of instrument CHANNEL trip signals and auxiliary equipment required to initiate action to accomplish a protective trip function. A TRIP SYSTEM may require one or more instrument CHANNEL trip signals related to one or more plant parameters in order to initiate TRIP SYSTEM action. Initiation of protective action may require the tripping of a single TRIP SYSTEM or the coincident tripping of two TRIP SYSTEMs.

#### UNIDENTIFIED LEAKAGE

UNIDENTIFIED LEAKAGE shall be all leakage in the primary containment which is not IDENTIFIED LEAKAGE.

#### DRESDEN - UNITS 2 & 3

## **REFUELING OPERATIONS**

#### 3.10 - LIMITING CONDITIONS FOR OPERATION

B. Instrumentation

At least 2 source range monitor<sup>(a)</sup> (SRM) CHANNEL(s) shall be OPERABLE and inserted to the normal operating level with:

- 1. Continuous visual indication in the control room,
- 2. One of the required SRM detectors located in the quadrant where CORE ALTERATION(s) are being performed and the other required SRM detector located in an adjacent quadrant, and
- Unless adequate SHUTDOWN MARGIN has been demonstrated per Specification 3.3.A and the "one-rodout" Refuel position interlock has been demonstrated OPERABLE per Specification 3.10.A, the "shorting links" shall be removed from the RPS circuitry prior to and during the time any control rod is withdrawn<sup>(b)</sup>.

#### **APPLICABILITY:**

OPERATIONAL MODE 5, unless the following conditions are met:

 No more than two fuel assemblies are present in each core quadrant associated with an SRM;

#### 4.10 - SURVEILLANCE REQUIREMENTS

B. Instrumentation

Each of the required SRM channels shall be demonstrated OPERABLE by:

- 1. At least once per 12 hours:
  - a. Performance of a CHANNEL CHECK.
  - b. Verifying the detectors are inserted to the normal operating level, and
  - c. During CORE ALTERATION(s), verifying that the detector of an OPERABLE SRM CHANNEL is located in the core quadrant where CORE ALTERATION(s) are being performed and another is located in an adjacent quadrant.
- 2. Performance of a CHANNEL FUNCTIONAL TEST:
  - a. Within 24 hours prior to the start of CORE ALTERATION(s), and
  - b. At least once per 7 days.
- 3. Verifying that the channel count rate is at least 3 cps:
  - a. Prior to control rod withdrawal,
  - b. Prior to and at least once per 12 hours during CORE ALTERATION(s),
  - c. At least once per 24 hours.

DRESDEN - UNITS 2 & 3

a The use of special movable detectors during CORE ALTERATION(s) in place of the normal SRM neutron detectors is permissible as long as these special detectors are connected to the normal SRM circuits.

b Not required for control rods removed per Specification 3.10.1 and 3.10.J

#### **REFUELING OPERATIONS**

F. DELETED

•

F. DELETED

3.10 - LIMITING CONDITIONS FOR OPERATION 4.10 - SURVEILLANCE REQUIREMENTS

# THIS PAGE INTENTIONALLY LEFT BLANK.

Amendment Nos.

DELETED 3/4.10.F

## 3/4.10.A Reactor Mode Switch

Locking the OPERABLE reactor mode switch in the Shutdown or Refuel position, as specified, ensures that the restrictions on control rod withdrawal and refueling platform movement during the refueling operations are properly activated. These conditions reinforce the refueling procedures and reduce the probability of inadvertent criticality, damage to reactor internals or fuel assemblies, and exposure of personnel to excessive radioactivity.

The addition of large amounts of reactivity to the core is prevented by operating procedures, which are in turn backed up by refueling interlocks on rod withdrawal and movement of the refueling platform. When the mode switch is in the Refuel position, interlocks prevent the refueling platform from being moved over the core if a control rod is withdrawn and fuel is on a hoist. If the refueling platform is over the core with fuel on a hoist, control rod motion is blocked by the interlocks. With the mode switch in the refuel position only one control rod can be withdrawn.

#### <u>3/4.10.B</u> Instrumentation

The OPERABILITY of at least two source range monitors ensures that redundant monitoring capability is available to detect changes in the reactivity condition of the core, whenever reactor criticality is possible.

The source range monitors (SRM) are provided to monitor the core during periods of station shutdown and to guide the operator during refueling operations and reactor startup. Requiring two OPERABLE source range monitors in and adjacent to any core quadrant where fuel or control rods are being moved assures adequate monitoring of that quadrant during such alterations. Requiring a minimum of 3 counts per second whenever criticality is possible provides assurance that neutron flux is being monitored. The SRM system is designed to provide a signal-to-noise ratio of at least 3:1 and a count rate of at least 3 counts per second. Criticality is considered to be impossible if there are no more than two assemblies in a quadrant and if these are in locations adjacent to the source range monitors (i.e., spatially separated).

Special movable detectors may be used during CORE ALTERATION(s) in place of the normal SRM neutron detectors. These special detectors must be connected to the normal SRM circuits such that the applicable neutron flux indication, control rod blocks and scram signals can be generated. The special detectors provide more flexibility in monitoring reactivity changes during fuel loading since they can be positioned anywhere within the core during refueling provided they meet the location requirements of the specification.

When the Reactor Protection System shorting links are removed, the source range monitors provide added protection against local criticalities by providing an initiating signal for a reactor scram on high neutron flux.

#### <u>3/4.10.C</u> Control Rod Position

The requirement that all control rods be inserted during other CORE ALTERATION(s) ensures that fuel will not be loaded into a cell without an inserted control rod.

#### <u>3/4.10.D</u> Decay Time

The minimum requirement for reactor subcriticality prior to fuel movement ensures that sufficient time has elapsed to allow the radioactive decay of the short lived fission products. This decay time is consistent with the assumptions used in the accident analyses.

#### <u>3/4.10.E</u> <u>Communications</u>

The requirement for communications capability ensures that refueling station personnel can be promptly informed of significant changes in the facility status regarding core reactivity conditions during movement of fuel within the reactor pressure vessel.

#### <u>3/4.10.F</u> <u>DELETED</u>

<u>3/4.10.G</u> Water Level - Reactor Vessel

#### <u>3/4.10.H</u> Water Level - Spent Fuel Storage Pool

The restrictions on minimum water level ensure that sufficient water depth is available to remove 99% of the assumed 10% iodine gap activity released from the rupture of an irradiated fuel assembly. This minimum water depth is consistent with the assumptions of the accident analysis.

#### 5.0 DESIGN FEATURES

#### 5.1 <u>SITE</u>

#### Site and Exclusion Area

5.1.A The site consists of approximately 953 acres adjacent to the Illinois River at the point where it is formed by the confluence of the Des Plaines and Kankakee Rivers, in the northeast quarter of the Goose Lake Township, Grundy County, Illinois. The Exclusion Area shall not be less than 800 meters from the centerline of the chimney.

#### Low Population Zone

**5.1.B** The Low Population Zone shall be a five mile radius from the centerline of the chimney.

#### Radioactive Gaseous Effluents

5.1.C Information regarding radioactive gaseous effluents shall be located in the OFFSITE DOSE CALCULATION MANUAL.

#### **Radioactive Liquid Effluents**

5.1.D Information regarding radioactive liquid effluents shall be located in the OFFSITE DOSE CALCULATION MANUAL.

SITE 5.1

# FIGURE 5.1.A-1

# INTENTIONALLY LEFT BLANK

DRESDEN - UNITS 2 & 3

۲.

- K

SITE 5.1

FIGURE 5.1.B-1

# INTENTIONALLY LEFT BLANK

DRESDEN - UNITS 2 & 3

-.

~ **.** 

5. ¥

#### PRIMARY CONTAINMENT INTEGRITY (PCI)

PRIMARY CONTAINMENT INTEGRITY (PCI) shall exist when:

- a. All primary containment penetrations required to be closed during accident conditions are either:
  - 1) Capable of being closed by an OPERABLE primary containment automatic isolation valve system, or
  - 2) Closed by at least one manual valve, blind flange, or deactivated automatic valve secured in its closed position, except for valves that are open under administrative control as permitted by Specification 3.7.D.
- b. All primary containment equipment hatches are closed and sealed.
- c. Each primary containment air lock is in compliance with the requirements of Specification 3.7.C.
- d. The primary containment leakage rates are within the limits of Specification 3.7.B.
- e. The suppression chamber is in compliance with the requirements of Specification 3.7.K.
- f. The sealing mechanism associated with each primary containment penetration; e.g., welds, bellows or O-rings, is OPERABLE.

#### PROCESS CONTROL PROGRAM (PCP)

The PROCESS CONTROL PROGRAM (PCP) shall contain the current formulas, sampling, analysis, test, and determinations to be made to ensure that processing and packaging of solid radioactive wastes based on demonstrated processing of actual or simulated wet solid wastes will be accomplished in such a way as to assure compliance with 10 CFR Parts 20, 61, and 71, State regulations, burial ground requirements, and other requirements governing the disposal of solid radioactive waste.

#### RATED THERMAL POWER (RTP)

RATED THERMAL POWER (RTP) shall be a total reactor core heat transfer rate to the reactor coolant of 2511 MWT.

#### REACTOR PROTECTION SYSTEM (RPS) RESPONSE TIME

REACTOR PROTECTION SYSTEM (RPS) RESPONSE TIME shall be the time interval for each trip function from the opening of the sensor contact up to and including the opening of the trip actuator.

#### REPORTABLE EVENT

A REPORTABLE EVENT shall be any of those conditions specified in Section 50.73 to 10 CFR Part 50.

#### ROD DENSITY

ROD DENSITY shall be the number of control rod notches inserted as a fraction of the total number of control rod notches. All rods fully inserted is equivalent to 100% ROD DENSITY.

#### SECONDARY CONTAINMENT INTEGRITY (SCI)

SECONDARY CONTAINMENT INTEGRITY (SCI) shall exist when:

- a. All secondary containment penetrations required to be closed during accident conditions are either:
  - 1) Capable of being closed by an OPERABLE secondary containment automatic isolation valve system, or
  - 2) Closed by at least one manual valve, blind flange, or deactivated automatic damper secured in its closed position, except as permitted by Specification 3.7.0.
- b. All secondary containment hatches and blowout panels are closed and sealed.
- c. The standby gas treatment system is in compliance with the requirements of Specification 3.7.P.
- d. At least one door in each access to the secondary containment is closed.
- e. The sealing mechanism associated with each secondary containment penetration; e.g., welds, bellows or O-rings, is OPERABLE.
- f. The pressure within the secondary containment is less than or equal to the value required by Specification 4.7.N.1.

#### SHUTDOWN MARGIN (SDM)

SHUTDOWN MARGIN (SDM) shall be the amount of reactivity by which the reactor is subcritical or would be subcritical assuming all control rods are fully inserted except for the single control rod of highest reactivity worth which is assumed to be fully withdrawn and the reactor is in the shutdown condition; cold, i.e. 68°F; and xenon free.

#### SOURCE CHECK

A SOURCE CHECK shall be the qualitative assessment of CHANNEL response when the CHANNEL sensor is exposed to a radioactive source.

.

#### THERMAL POWER

THERMAL POWER shall be the total reactor core heat transfer rate to the reactor coolant.

#### TRIP SYSTEM

A TRIP SYSTEM shall be an arrangement of instrument CHANNEL trip signals and auxiliary equipment required to initiate action to accomplish a protective trip function. A TRIP SYSTEM may require one or more instrument CHANNEL trip signals related to one or more plant parameters in order to initiate TRIP SYSTEM action. Initiation of protective action may require the tripping of a single TRIP SYSTEM or the coincident tripping of two TRIP SYSTEMs.

#### UNIDENTIFIED LEAKAGE

UNIDENTIFIED LEAKAGE shall be all leakage which is not IDENTIFIED LEAKAGE.

#### QUAD CITIES - UNITS 1 & 2

# REFUELING OPERATIONS

#### 3.10 - LIMITING CONDITIONS FOR OPERATION

#### B. Instrumentation

At least 2 source range monitor<sup>(a)</sup> (SRM) CHANNEL(s) shall be OPERABLE and inserted to the normal operating level with:

- 1. Continuous visual indication in the control room,
- 2. One of the required SRM detectors located in the quadrant where CORE ALTERATION(s) are being performed and the other required SRM detector located in an adjacent quadrant, and
- Unless adequate SHUTDOWN MARGIN has been demonstrated per Specification 3.3.A and the "one-rodout" Refuel position interlock has been demonstrated OPERABLE per Specification 3.10.A, the "shorting links" shall be removed from the RPS circuitry prior to and during the time any control rod is withdrawn<sup>(b)</sup>.

#### APPLICABILITY:

OPERATIONAL MODE 5, unless the following conditions are met:

 No more than two fuel assemblies are present in each core quadrant associated with an SRM;

#### 4.10 - SURVEILLANCE REQUIREMENTS

#### B. Instrumentation

Each of the required SRM channels shall be demonstrated OPERABLE by:

- 1. At least once per 12 hours:
  - a. Performance of a CHANNEL CHECK.
  - b. Verifying the detectors are inserted to the normal operating level, and
  - c. During CORE ALTERATION(s), verifying that the detector of an OPERABLE SRM CHANNEL is located in the core quadrant where CORE ALTERATION(s) are being performed and another is located in an adjacent quadrant.
- 2. Performance of a CHANNEL FUNCTIONAL TEST:
  - a. Within 24 hours prior to the start of CORE ALTERATION(s), and
  - b. At least once per 7 days.
- 3. Verifying that the channel count rate is at least 3 cps:
  - a. Prior to control rod withdrawal,
  - b. Prior to and at least once per 12 hours during CORE ALTERATION(s),
  - c. At least once per 24 hours.

QUAD CITIES - UNITS 1 & 2

a The use of special movable detectors during CORE ALTERATION(s) in place of the normal SRM neutron detectors is permissible as long as these special detectors are connected to the normal SRM circuits.

b Not required for control rods removed per Specification 3.10.1 and 3.10.J

#### С. **REFUELING OPERATIONS**



# 3.10 - LIMITING CONDITIONS FOR OPERATION 4.10 - SURVEILLANCE REQUIREMENTS

F. DELETED

- F. DELETED

# THIS PAGE INTENTIONALLY LEFT BLANK.

QUAD CITIES - UNITS 1 & 2

#### 3/4.10.A Reactor Mode Switch

Locking the OPERABLE reactor mode switch in the Shutdown or Refuel position, as specified, ensures that the restrictions on control rod withdrawal and refueling platform movement during the refueling operations are properly activated. These conditions reinforce the refueling procedures and reduce the probability of inadvertent criticality, damage to reactor internals or fuel assemblies, and exposure of personnel to excessive radioactivity.

The addition of large amounts of reactivity to the core is prevented by operating procedures, which are in turn backed up by refueling interlocks on rod withdrawal and movement of the refueling platform. When the mode switch is in the Refuel position, interlocks prevent the refueling platform from being moved over the core if a control rod is withdrawn and fuel is on a hoist. If the refueling platform is over the core with fuel on a hoist, control rod motion is blocked by the interlocks. With the mode switch in the refuel position only one control rod can be withdrawn.

## <u>3/4.10.B</u> Instrumentation

The OPERABILITY of at least two source range monitors ensures that redundant monitoring capability is available to detect changes in the reactivity condition of the core, whenever reactor criticality is possible.

The source range monitors (SRM) are provided to monitor the core during periods of station shutdown and to guide the operator during refueling operations and reactor startup. Requiring two OPERABLE source range monitors in and adjacent to any core quadrant where fuel or control rods are being moved assures adequate monitoring of that quadrant during such alterations. Requiring a minimum of 3 counts per second whenever criticality is possible provides assurance that neutron flux is being monitored. The SRM system is designed to provide a signal-to-noise ratio of at least 3:1 and a count rate of at least 3 counts per second. Criticality is considered to be impossible if there are no more than two assemblies in a quadrant and if these are in locations adjacent to the source range monitors (i.e., spatially separated).

Special movable detectors may be used during CORE ALTERATION(s) in place of the normal SRM neutron detectors. These special detectors must be connected to the normal SRM circuits such that the applicable neutron flux indication, control rod blocks and scram signals can be generated. The special detectors provide more flexibility in monitoring reactivity changes during fuel loading since they can be positioned anywhere within the core during refueling provided they meet the location requirements of the specification.

When the Reactor Protection System shorting links are removed, the source range monitors provide added protection against local criticalities by providing an initiating signal for a reactor scram on high neutron flux.

4

#### 3/4.10.C Control Rod Position

The requirement that all control rods be inserted during other CORE ALTERATION(s) ensures that fuel will not be loaded into a cell without an inserted control rod.

#### 3/4.10.D Decay Time

The minimum requirement for reactor subcriticality prior to fuel movement ensures that sufficient time has elapsed to allow the radioactive decay of the short lived fission products. This decay time is consistent with the assumptions used in the accident analyses.

#### 3/4.10.E Communications

The requirement for communications capability ensures that refueling station personnel can be promptly informed of significant changes in the facility status regarding core reactivity conditions during movement of fuel within the reactor pressure vessel.

#### 3/4.10.F DELETED

3/4.10.G Water Level - Reactor Vessel

#### 3/4.10.H Water Level - Spent Fuel Storage Pool

The restrictions on minimum water level ensure that sufficient water depth is available to remove 99% of the assumed 10% iodine gap activity released from the rupture of an irradiated fuel assembly. This minimum water depth is consistent with the assumptions of the accident analysis.

# 5.1 SITE

~

#### Site and Exclusion Area

5.1.A The site consists of approximately 784 acres on the east bank of the Mississippi River opposite the mouth of the Wapsipinicon River, approximately three miles north of the village of Cordova, Rock Island County, Illinois. The Exclusion Area shall not be less than 380 meters from the centerline of the chimney.

#### Low Population Zone

5.1.B The Low Population Zone shall be a three mile radius from the centerline of the chimney.

#### Radioactive Gaseous Effluents

5.1.C Information regarding radioactive gaseous effluents shall be located in the OFFSITE DOSE CALCULATION MANUAL.

#### Radioactive Liquid Effluents

5.1.D Information regarding radioactive liquid effluents shall be located in the OFFSITE DOSE CALCULATION MANUAL.

#### QUAD CITIES - UNITS 1 & 2

# FIGURE 5.1.A-1

# INTENTIONALLY LEFT BLANK

QUAD CITIES - UNITS 1 & 2

.

٠

۰,

FIGURE 5.1.B-1

# INTENTIONALLY LEFT BLANK

5-3

QUAD CITIES - UNITS 1 & 2

۰.

#### ATTACHMENT D

#### SIGNIFICANT HAZARDS EVALUATION FOR DRESDEN AND QUAD CITIES NUCLEAR POWER STATIONS FOR LICENSE NOS. DPR-19, DPR-25, DPR-29, AND DPR-30

ComEd has evaluated this proposed amendment that resolves open items from the **Technical Specification Upgrade Program (TSUP)** and determined that it involves no significant hazards consideration. According to 10 CFR 50.92(c), a proposed amendment to an operating license involves no significant hazards consideration if operation of the facility, in accordance with the proposed amendment, would not:

- 1) Involve a significant increase in the probability or consequences of an accident previously evaluated; or
- 2) Create the possibility of a new or different kind of accident from any accident previously evaluated; or
- 3) Involve a significant reduction in a margin of safety.

# The proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated because:

In general, the proposed amendment represents the conversion of current requirements to a more generic format, or the addition of requirements which are based on the current safety analysis. Implementation of these changes will provide increased reliability of equipment assumed to operate in the current safety analysis, or provide continued assurance that specified parameters remain within their acceptance limits, and as such, will not significantly increase the probability or consequences of a previously evaluated accident.

Some of the proposed changes represent minor curtailments of the current requirements which are based on generic guidance or previously approved provisions for other stations. The proposed amendment for Dresden and Quad Cities Station's Technical Specifications are based on STS guidelines or later operating BWR plants' NRC accepted changes. Any deviations from STS requirements do not significantly increase the probability or consequences of any previously evaluated accidents for Dresden or Quad Cities Stations. The proposed amendment is consistent with the current safety analyses and has been previously determined to represent sufficient requirements for the assurance and reliability of equipment assumed to operate in the safety analysis, or provide continued assurance that specified parameters remain within their acceptance limits. As such, these changes will not significantly increase the probability or consequences of a previously evaluated accident.

The associated systems related to this proposed amendment are not assumed in any safety analysis to initiate any accident sequence for Dresden or Quad Cities Stations; therefore, the probability of any accident previously evaluated is not increased by the

c:\tsup\cleanest.wpf

#### ATTACHMENT D

proposed amendment. In addition, the proposed surveillance requirements for the proposed amendments to these systems are generally more prescriptive than the current requirements specified within the Technical Specifications. The additional surveillance requirements improve the reliability and availability of all affected systems and therefore, reduce the consequences of any accident previously evaluated as the probability of the systems related to the TSUP open items outlined within the proposed Technical Specifications performing their intended function is increased by the additional surveillances.

# Create the possibility of a new or different kind of accident from any previously evaluated because:

In general, the proposed amendment represents the conversion of current requirements to a more generic format, the addition of requirements which are based on the current safety analysis, and some minor curtailments of the current requirements which are based on generic guidance or previously approved provisions for other stations. These changes do not involve revisions to the design of the station. Some of the changes may involve revision in the operation of the station; however, these provide additional restrictions which are in accordance with the current safety analysis, or are to provide for additional testing or surveillances which will not introduce new failure mechanisms beyond those already considered in the current safety analyses.

The proposed amendment for Dresden and Quad Cities Station's Technical Specification is based on STS guidelines or later operating BWR plants' NRC accepted changes. The proposed amendment has been reviewed for acceptability at the Dresden and Quad Cities Nuclear Power Stations considering similarity of system or component design versus the STS or later operating BWRs. Any deviations from STS requirements do not create the possibility of a new or different kind of accident previously evaluated for Dresden or Quad Cities Stations. No new modes of operation are introduced by the proposed changes. Surveillance requirements are changed to reflect improvements in technique, frequency of performance or operating experience at later plants. Proposed changes to action statements in many places add requirements that are not in the present technical specifications. The proposed changes maintain at least the present level of operability. Therefore, the proposed changes do not create the possibility of a new or different kind of accident from any previously evaluated.

The associated systems related to this proposed amendment are not assumed in any safety analysis to initiate any accident sequence for Dresden or Quad Cities Stations. In addition, the proposed surveillance requirements for affected systems associated with the TSUP open items are generally more prescriptive than the current requirements specified within the Technical Specifications; therefore, the proposed changes do not create the possibility of a new or different kind of accident from any previously evaluated.

c:\tsup\cleanest.wpf

.

#### Involve a significant reduction in the margin of safety because:

In general, the proposed amendment represents the conversion of current requirements to a more generic format, the addition of requirements which are based on the current safety analysis, and some minor curtailments of the current requirements which are based on generic guidance or previously approved provisions for other stations. Some of the latter individual items may introduce minor reductions in the margin of safety when compared to the current requirements. However, other individual changes are the adoption of new requirements which will provide significant enhancement of the reliability of the equipment assumed to operate in the safety analysis, or provide enhanced assurance that specified parameters remain with their acceptance limits. These enhancements compensate for the individual minor reductions, such that taken together, the proposed changes will not significantly reduce the margin of safety.

The proposed amendment to the Technical Specifications implements present requirements, or the intent of present requirements in accordance with the guidelines set forth in the STS. Any deviations from STS requirements do not significantly reduce the margin of safety for Dresden or Quad Cities Stations. The proposed changes are intended to improve readability, usability, and the understanding of technical specification requirements while maintaining acceptable levels of safe operation. The proposed changes have been evaluated and found to be acceptable for use at Dresden or Quad Cities based on system design, safety analysis requirements and operational performance. Since the proposed changes are based on NRC accepted provisions at other operating plants that are applicable at Dresden or Quad Cities and maintain necessary levels of system or component reliability, the proposed changes do not involve a significant reduction in the margin of safety.

The proposed amendment for Dresden and Quad Cities Stations will not reduce the availability of systems associated with the TSUP open items when required to mitigate accident conditions; therefore, the proposed changes do not involve a significant reduction in the margin of safety.

#### ATTACHMENT D

#### ENVIRONMENTAL ASSESSMENT STATEMENT APPLICABILITY REVIEW

ComEd has evaluated the proposed supplemental amendment against the criteria for the identification of licensing and regulatory actions requiring environmental assessment in accordance with 10 CFR 51.20. It has been determined that the proposed supplemental changes meet the criteria for a categorical exclusion as provided under 10 CFR 51.22 (c)(9). This conclusion has been determined because the supplemental 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. Additionally, this request does not involve a significant increase in individual or cumulative occupational radiation exposure. Therefore, the Environmental Assessment Statement is not applicable for these supplemental changes.