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February 23, 1996

ComEd

JSP Ltr. #96-0023

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
Clarification of Issues Regarding Open Items for the Technical Specification Upgrade Program (TSUP)
NRC Docket Nos. 50-237/249 and 50-254/265

Reference: (a) P. Piet letter to U. S. NRC, dated November 14, 1995.

In Reference (a), ComEd submitted to the NRC staff, resolution of open items submitted to that time, for the Dresden and Quad Cities TSUP project. ComEd met with representatives of the NRC staff on November 29 and 30, 1995 to further discuss issues from the Reference (a) submittal. To clarify issues raised during these and subsequent discussions, ComEd has provided as an attachment to this letter, additional information regarding the Reference (a) submittal.

ComEd requests NRC staff review of the Reference (a) submittal prior to March 31, 1996 in order to provide ComEd sufficient time to adequately implement the TSUP project at Dresden and Quad Cities prior to June 30, 1996.

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

Sincerely,

J. Stephen Perry
Vice President
BWR Operations

Attachment: Clarification of Issues Regarding Cleanup No. 2 Submittal dated November 14, 1995.

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

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Table of Contents

Provide an explanation of the submitted Table of Contents pages.

The proposed Table of Contents (TOC) pages are consistent with the previously provided pages for the TS project. The TOC is administrative in nature and does not introduce any specific TS requirements for Dresden or Quad Cities Stations.

TSUP Section 1.0

TSUP Page 1-2 (Dresden and Quad Cities
Some items from Attachment B of Reference (a) should be more explicitly described and explained.

The reference to "Specification 6.6" in the Definition for the CORE OPERATING LIMITS REPORT (COLR) on page 1-2 has been modified to "Specification 6.9". The proposed change ensures consistency with proposed TS 6.9 for the COLR as provided in the September 1, 1995 submittal for Dresden and the September 20, 1995 submittal for Quad Cities.

TSUP Page 1-4 (Dresden and Quad Cities
Some items from Attachment B of Reference (a) should be more explicitly described and explained.

The omission of the letter 'U' in UFSAR as described on page 1-4 is a typographical error and has been corrected. Also, the term "Section" in the Definition of OFFSITE DOSE CALCULATION MANUAL (ODCM) has been changed to "Specification" to ensure consistency in format with other cross-references in the proposed TS. In addition, the reference to "Specification 6.6" in the Definition for ODCM on page 1-4 has been changed to "Specification 6.9". This proposed change ensures consistency with proposed TS 6.9 for the ODCM as provided in the September 1, 1995 submittal for Dresden and the September 20, 1995 submittal for Quad Cities.

TSUP Page 1-8 (Dresden and Quad Cities)
Some items from Attachment B of Reference (a) should be more explicitly described and explained.

The NOTATION for "Not applicable" in Table 1-1 on page 1-8 has been changed from "N.A." to "NA" to ensure consistency with the abbreviations used throughout proposed TS 3/4.2. The proposed change is administrative in nature and does not affect proposed TS requirements.

TSUP Section 2.0

TSUP Pages 2-1 and 2-2 (Dresden and Quad Cities)
Some items from Attachment B of Reference (a) should be more explicitly described and explained.

The reference to "Specification 6.4" in the ACTION requirements for the Safety Limits on pages 2-1 and 2-2 has been changed to "Specification 6.7". The proposed change ensures consistency with proposed TS 6.7 for Safety Limit Violations as provided in the September 1, 1995 submittal for Dresden and the September 20, 1995 submittal for Quad Cities.

TSUP Section 3/4.2

TSUP Page 3/4.2-1 (Dresden and Quad Cities)
The description of the proposed changes regarding "simulated automatic operation" should be expanded.

"Simulated automatic operation" is interpreted to be functionally redundant to a LOGIC SYSTEM FUNCTIONAL TEST (LSFT) performed in conjunction with CHANNEL FUNCTIONAL TESTs. This additional detailing of the required test is unnecessary and was not included in NUREG-1433 and as such, is proposed to not be included in the proposed TS for Dresden and Quad Cities Stations. Therefore, the proposed changes do not eliminate the requirements for performing the appropriate testing.

TSUP Pages 3/4.2-3, -4, and -5 (Dresden and Quad Cities)
Address Open Item 4 from the NRC staff's Safety Evaluation for TSUP 3/4.2, dated November 20, 1995.

Open Item 4 addressed the relocation of CTS 4.2.D to TSUP 4.7.P.4.b(1) and 4.7.P.4.b(2) (Standby Gas Treatment (SBGT)). CTS 4.2.D refers to the isolation of the reactor building ventilation and standby gas treatment system initiation each operating cycle. Based upon current operating cycle schedules, this is interpreted to mean approximately every 18 months. This issue is addressed in proposed TS 4.7.P.4.b and proposed TS 4.7.O.2. Proposed TS 4.7.P.4.b(1) requires a manual SBGT initiation every 18 months. Proposed TS 4.7.P.4.b(2) requires an initiation of SBGT based on a simulated automatic initiation signal every 18 months. As such, the proposed changes are consistent with CTS requirements. Proposed 4.7.O.2 requires that every 18 months, each automatic isolation damper in the Secondary Containment system actuates to its isolation position. Thus, CTS 4.2.D requirements for reactor building ventilation isolation are retained by the proposed 4.7.O.2 for Secondary Containment isolation dampers.

In Attachment A, Item 24 of the Reference (a) letter, the last sentence states "Therefore, the TSUP minimum channel requirements (per Trip System) for Dresden and Quad Cities (4 and 8 respectively) do not represent a significant reduction in the level of safety." Provide additional clarification.

The sentence refers to the originally proposed submittal. This sentence should reflect the revised version proposed in the November 14, 1995 submittal and should state: "Therefore, the TSUP minimum channel requirements (per Trip System) for Dresden and Quad Cities (2 of 4 in each of 2 sets) do not represent a significant reduction in the level of safety."

TSUP Page 3/4.2-8 (Dresden and Quad Cities)
It is unclear where the SER open item for the Table 4.2.A-1, Item 3.d CHANNEL CALIBRATION requirements [Main Steamline (MSL) High], is addressed (Open Item Number 2 in SER dated November 20, 1995).

This issue was addressed in Item 22 of Attachment A to the Reference (a) letter. ComEd proposes to maintain the originally proposed surveillance frequency for Table 4.2.A-1, Item 3.d, regarding the Main Steamline (MSL) High - Flow requirements as 'E' (every 18 months). CTS requirements specify the surveillance frequency to be once every three months. The proposed change has been shown by the instrument calibration data that the proposed revised surveillance frequency does not adversely affect system operational performance. As such, the proposed change does not significantly affect existing plant safety margins.

TSUP Page 3/4.2-9 (Dresden and Quad Cities)
On page 3/4.2-9, clarify if and how Item 10 of Reference (a) applies; clarify if and how Item 29 applies to Table item 6.b; clarify if and how Item 29 applies elsewhere on page 3/4.2-9.

Item 10 of Reference (a) applies to Dresden page 3/4.2-9 regarding the renaming of "Condensate Flow - High" to "Return Flow - High". The Functional Unit for the Isolation Condenser (Item 5.b) in Dresden Table 4.2.A-1 on page 3/4.2-9 has been changed from "Condensate Flow" to "Return Flow". The proposed change maintains consistency with current plant terminology for the Isolation Condenser system. This proposed change is administrative in nature and does not affect TS requirements. Item 29 applies to both Dresden and Quad Cities pages 3/4.2-9 by changing the surveillance frequency of the CHANNEL CALIBRATION from "Q" to "E" for HPCI Reactor Vessel Pressure - Low, which maintains existing requirements.

In Table 4.2.A-1, Item 6.a and 6.b, expand the discussion regarding HPCI CHANNEL CALIBRATION surveillance frequencies, specifically the differences between the current Technical Specifications (CTS) and the proposed changes. There is additional notation in the Quad Cities CTS that is not part of the Dresden CTS.

Dresden CTS does not include requirements similar to Quad Cities CTS Note [2] applicability with regards to HPCI isolation requirements. Such requirements are specified in TSUP 4.0.C, the Bases for which states in part: "Surveillance Requirements do not have to be performed on inoperable equipment because the ACTION requirements define the remedial measures that apply. However, the Surveillance Requirements have to be met to demonstrate that inoperable equipment has been restored to OPERABLE status." As such, the retention of Quad Cities CTS Note [2] has been retained per the requirements TSUP 4.0.C which has been previously approved by the NRC staff in Quad Cities Amendment Nos. 164/160, dated November 20, 1995.

The proposed changes to surveillance frequencies have been shown by the instrument calibration data to provide a sufficient level of protection for ensuring appropriate parameters are within acceptable levels.

TSUP Page 3/4.2-22 (Dresden and Quad Cities)
Explain the basis for changing from 8 hours to 6 hours on page 3/4.2-22.

The proposed changes to the Action requirements are based upon the requirements specified in NUREG-1433. The proposed changes reduce the period (from 8 hours to 6 hours) for which a lower, more conservative MODE of OPERATION is required with degraded ATWS instrumentation requirements.

TSUP Page 3/4.2-26 (Dresden)
Expand more fully any relocations of requirements from the Dresden Technical Specifications Table 3.2.D-1 to the Bases.

The requirements for the Trip Setpoint information regarding time delays has been relocated to the TS Bases for TS 3/4.5. The proposed change eliminates design details from the TS which are more appropriately controlled in the TS Bases.

TSUP Page 3/4.2-27 (Quad Cities)
Some items from Attachment B of Reference (a) should be more explicitly described and explained.

The title for Quad Cities Table 3.2.D-1 on page 3/4.2-27 has been changed from "Table 4.2.D-1" to "Table 3.2.D-1". In addition, on the same page, the term "SURVEILLANCE REQUIREMENTS" in the title has been deleted. The proposed changes are administrative in nature and ensures consistency in format with other proposed TS sections.

TSUP Pages 3/4.2-29, -30, -31, and -33 (Dresden)

Clarification of Issues Regarding Cleanup No. 2 Submittal
dated November 14, 1995

TSUP Pages 3/4.2-30, -31, -32, and -34 (Quad Cities)
Some items from Attachment B of Reference (a) should be more explicitly described and explained.

The re-numbering of footnotes in Dresden and Quad Cities Table 3.2.E-1, as described on Dresden pages 3/4.2-29, 3/4.2-30, 3/4.2-31 and 3/4.2-33 and Quad Cities pages 3/4.2-30, 3/4.2-31, 3/4.2-32 and 3/4.2-34, is necessary due to the resolution of the Open Item from TSUP 3/4.10 regarding SRM count rates (Open Item Number 1 of SER dated June 23, 1995 and Open Item Number 10 of SER dated November 20, 1995). The proposed changes to the footnote notation is administrative in nature and does not affect proposed TS requirements.

On page Dresden and Quad Cities TSUP page 3/4.2-30 (Table 3.2.E-1 and Table 4.2.E-1, item 3.a), it is unclear where the open items (Items 7 and 10) from the NRC staff's Safety Evaluation (dated November 20, 1995 for TSUP 3/4.2) is addressed.

In the NRC staff's SER for TSUP 3/4.2, Item 3.a (SRM - Detector not full in) in Tables 3.2.E-1 and 4.2.E-1, were left as open items (Open Item Numbers 7 and 10 of SER Dated November 2, 1995). Table 3.2.E-1 and Table 4.2.E-1, regarding the required CHANNEL(s), Minimum CHANNEL(s), Applicable OPERATIONAL MODE(s), CHANNEL CHECK, CHANNEL FUNCTIONAL TEST, Trip Setpoint, and CHANNEL CALIBRATION, for Item 3.a refers to the requirements for the SRM - Detector not full in. Corresponding footnotes (b), (f) and (h), respectively, refer to the function being automatically bypassed if the detector count rate is >100 cps or the IRM channels are on range 3 or higher. It was originally stated to leave this issue as an open item, in ComEd's RAI response for TSUP 3/4.2, dated August 4, 1995. Confusion existed regarding the conformance of STS terminology for the "SRM - detector not full in" and "SRM - downscale" to CTS requirements. To resolve this discrepancy, ComEd proposed to delete the requirements for "SRM - downscale" and revise the surveillance requirements for the "SRM - detector not full in" to maintain TS requirements that are consistent with the current plant design. As stated for Item 22 in Attachment A of Reference (a), ComEd deleted the requirements for Item 3.d (SRM Downscale) in Table 3.2.E-1 and Table 4.2.E-1 as this requirement is not designed as a physical control rod block (alarm function only). The proposed changes revised the CHANNEL CALIBRATION requirements for Item 3.a (SRM - Detector not full in) from "NA" to "E". This was to ensure that the "100 cps interlock" is appropriately maintained. No other technical changes to Item 3.a are required. As such, the system design requirements for required CHANNEL(s), Minimum CHANNEL(s), Applicable OPERATIONAL MODE(s), CHANNEL CHECK, CHANNEL FUNCTIONAL TEST, Trip Setpoint, and CHANNEL CALIBRATION, are consistent with the actual plant configuration for the SRM system and are appropriately addressed by the proposed TS requirements for Item 3.a in Tables 3.2.E-1 and 4.2.E-1.

Expand the discussion regarding Item 43 from Attachment A to the Reference (a) letter regarding the revised trip setpoints for Dresden SDV Water Level High - Control Rod Block (Table 3.2.E-1).

ComEd has proposed to revise the Trip Setpoint for Dresden Unit 2, TSUP Table 3.2.E-1, Item 5.a, "Control Rod Block Instrumentation - Scram Discharge Volume Water Level - High." Due to system design differences, the setpoint for Unit 3 is unaffected by the proposed change. The revised setpoint for Unit 2 at Dresden more accurately reflects the instrument capabilities and inaccuracies for the Scram Discharge Volume. The design function for the SDV Water Level - High control rod block will not be affected by the proposed change. The revised setpoint for Dresden Unit 2 still assures that a rod block is received prior to the water volume being filled to such extent as to prevent control rod insertion upon receipt of a scram signal.

TSUP Pages 3/4.2-34, -35, and -36 (Dresden)
TSUP Pages 3/4.2-35, -36, and -37 (Quad Cities)
Some items from Attachment B of Reference (a) should be more explicitly described and explained.

The re-numbering of footnotes in Dresden and Quad Cities Table 4.2.E-1, as described on Dresden pages 3/4.2-34, 3/4.2-35 and 3/4.2-36 and Quad Cities pages 3/4.2-35, 3/4.2-36 and 3/4.2-37, is necessary due to the resolution of the Open Item from TSUP 3/4.2 regarding SRM Downscale requirements (Open Item Number 1 of SER dated June 23, 1995 and Open Item Number 10 of SER dated November 20, 1995). The proposed changes to the footnote notation is administrative in nature and does not affect proposed TS requirements.

ComEd originally proposed to leave Item 5.b in Table 3.2.E-1 as an open item pending further review of the applicability of STS guidelines to system design for SDV at Dresden and Quad Cities. As discussed in Item 22 of Attachment A of the Reference (a) letter, the SDV system is required to be OPERABLE in MODE(s) 1 and 2 in TSUP 3/4.3.K. However, due to system design limitations, the SDV switch-in-bypass requirements only affect operation during Mode 5. Therefore, MODE(s) 1 and 2 are not directly applicable to the SDV switch- in-bypass requirements. As such, the proposed requirements are consistent with the current design configuration of the plant. Because the proposed changes maintain existing requirements, existing plant safety margins are unaffected.

TSUP Page 3/4.2-38 and -41(Dresden)
TSUP Pages 3/4.2-39, and -42 (Quad Cities)
Some items from Attachment B of Reference (a) should be more explicitly described and explained.

The deletion of the term "Wide Range" from Table 3.2.F-1, Item 3 (Dresden page 3/4.2-38 and Quad Cities page 3/4.2-39) and Table 4.2.F-1, Item 3 (Quad Cities page 3/4.2-42) for Torus Water, eliminates plant design details unnecessary for inclusion in the TS. The proposed change is administrative in nature and does not reduce plant TS requirements for maintaining adequate Accident Monitoring Instrumentation for Torus Water Level.

In Table 4.2.F-1, the Dresden surveillance frequency for the CHANNEL CALIBRATION of Torus Water Level has been changed from 'E' to 'A' (annually). Current Tech Specs require a semi-annual channel calibration. Clarify the basis for this change.

Dresden CTS Table 4.2.4 specifies the surveillance requirements for Torus Water Level (Narrow Range), (Sight Glass) and (Wide Range). The surveillance requirements for 'Narrow Range' specify 'Once every 6 months'. The CTS surveillance requirements for 'Sight Glass' specify 'N/A'. The CTS requirements for 'Wide Range' specify 'Once every 12 months'. The proposed requirements specified in proposed Table 4.2.F-1 reflect the appropriate Regulatory Guide 1.97 Type A or Category 1 instrumentation as applicable for Dresden. The primary purpose of post accident monitoring (PAM) instrumentation is to display plant variables that provide information required by the control room operators during accident situations. This information provides the necessary support for the operator to take the manual actions for which no automatic control is provided and that are required for safety systems to accomplish their safety functions for Design Basis Events. The instruments that monitor these variables are designated as Type A, Category 1, and non-Type A, Category 1, in accordance with Regulatory Guide 1.97. The OPERABILITY of the accident monitoring instrumentation ensures that there is sufficient information available on selected plant parameters to monitor and assess plant status and behavior following an accident. Torus Water Level (Wide Range) does fall within this category. Torus Water Level (Narrow Range) and (Sight Glass) do not fall within this category of instrumentation. As such, Torus Water Level (Wide Range) has been retained within proposed TS Table 4.2.F-1. As previously discussed, the term '(Wide Range)' is a design detail unnecessary for inclusion within the TS. The requirements for Torus Water Level (Narrow Range) and (Sight Glass) are more applicable for administrative controls. The proposed requirements are consistent with those specified in NUREG-1433

Address Open Item 20 from the NRC staff's Safety Evaluation for TSUP 3/4.2, dated November 20, 1995.

Open Item 20 addressed the relocation of CTS requirements for the Torus to Drywell differential pressure instrumentation to TSUP 3/4.7.H. These requirements were inappropriate for inclusion in proposed Table 3.2.F-1 (Dresden TSUP page 3/4.2-38 and Quad Cities TSUP page 3/4.2-39) or Table 4.2.F-1 (Dresden TSUP page 41 and Quad Cities TSUP page 42) as Post Accident Monitoring instrumentation for Dresden Station RG 1.97 instrumentation. This instrumentation is appropriately controlled per the surveillance requirements of 4.7.H.1 and 4.7.H.2. The corresponding Action requirements are consistent with current licensing basis requirements. The requirements for the Drywell-Suppression Chamber Differential Pressure, TS 3/4.7.H, has been approved by the NRC staff in its SER for 3/4.7 (SER dated November 27, 1995).

In Table 4.2.F-1, for Torus Pressure, the surveillance frequency for the CHANNEL CALIBRATION is revised to 'Q' for Dresden and 'E' for Quad Cities. However, in Item 22 of Attachment A to the Reference (a) letter, this is stated as follows: "The proposed surveillance frequency for the CHANNEL CHECK and CHANNEL CALIBRATION for Torus Pressure has been changed from current requirements (daily and quarterly, respectively) to 'M' and 'E', respectively." Provide additional clarification.

The requirements for Dresden have been changed to 'M' and 'Q' and the requirements for Quad Cities have been changed to 'M' and 'E', respectively, in Table 4.2.F-1 for Torus Pressure CHANNEL CHECK and CHANNEL CALIBRATION requirements. The proposed changes have been shown by the instrument calibration data to provide a sufficient level of protection for ensuring appropriate parameters are within acceptable levels.

TSUP Page 3/4.2-39 (Dresden)
TSUP Pages 3/4.2-40 (Quad Cities)
Some items from Attachment B of Reference (a) should be more explicitly described and explained.

The term "Specification 6.6.C.3" in Table 3.2.F-1, Action 61.b, has been changed to "Specification 6.9.B" to accurately reference the appropriate section in TS 6.9 regarding the submittal of Special Reports. This proposed change ensures consistency with proposed TS 6.9 for Special Reports as provided in the September 1, 1995 submittal for Dresden and the September 20, 1995 submittal for Quad Cities.

TSUP Page 3/4.2-40 (Dresden)
TSUP Pages 3/4.2-41 (Quad Cities)
Some items from Attachment B of Reference (a) should be more explicitly described and explained. In addition, Table 3.2.F-1, page 3/4.2-40 (Dresden, 3/4.2-41 for Quad Cities) lists proposed changes for "at least one of". Provide an explanation for this proposed change.

ComEd has proposed to clarify Table 3.2.F-1, Action 63.b on Dresden page 3/4.2-40 and Quad Cities page 3/4.2-41, by the inclusion of the phrase "at least one of" when specifying the number of accident monitoring instrumentation CHANNEL(s) that are required to be restored to satisfy the Action requirements. The proposed change clarifies the applicability of the 30 day allowed-outage-time (AOT) Action requirements for the Safety & Relief Valve (S/RV) Position Indicators (Acoustic and Temperature) system design. A single indicator is available for the acoustic monitoring function and a single indicator is available for the temperature monitoring function. As such, if the acoustic monitor and the temperature monitor is inoperable, a 30-day AOT is provided to restore the monitor to OPERABLE status. Either monitor is capable of detecting that a S/RV is not properly seated. Both monitors are required in order to operate above MODE 3 unless as otherwise specified in proposed TS 3.2.F-1, Action 63.a. The proposed changes are consistent with the current licensing basis as described in current Technical Specifications 4.2.1, and as such, does not relax existing plant TS requirements.

TSUP Page 3/4.2-41 (Dresden)
TSUP Pages 3/4.2-42 (Quad Cities)

Table 4.2.F-1, Item 10, CHANNEL CALIBRATION is listed as Open Item 18 in the NRC staff's November 20, 1995 SER. Provide an explanation for the disposition of this open item.

Table 4.2.F-1, Item 10 refers to the Safety & Relief Valve (S/RV) Position Indicators - Acoustic & Temperature. The open item refers to Dresden CTS terminology for the S/RV which discusses a monthly calibration of instrument threshold levels. This issue is discussed in Attachment A, Item 22 of Reference (a). ComEd has proposed clarification to Table 4.2.F-1 regarding the CHANNEL CHECK of the S/RV Position Indicators. Table notation is proposed to maintain consistency with current licensing requirements and to clarify the appropriate requirements necessary to satisfy the surveillance requirements. Footnote (c) is added to Dresden Table 4.2.F-1 to maintain consistency with CTS requirements for the Acoustic Monitors. The CTS monthly verification of Acoustic Monitor instrument threshold levels is consistent with the proposed changes in notation for the CHANNEL CHECK - not the CHANNEL CALIBRATION. Therefore, the addition of footnote (c) resolves this open item from the NRC staff's SER and no additional changes are required regarding the S/RV Position Indicator CHANNEL CALIBRATION.

TSUP Pages 3/4.2-42 and 46 (Dresden)
TSUP Pages 3/4.2-43 and 47 (Quad Cities)
Some items from Attachment B of Reference (a) should be more explicitly described and explained

Footnote (a) on Dresden pages 3/4.2-42 and 3/4.2-46 and Quad Cities pages 3/4.2-43 and 3/4.2-47 has been deleted and the subsequent footnotes renumbered. Footnote (a) provides design details regarding the nitrogen and hydrogen concentrations for satisfying the CHANNEL CALIBRATION requirements and is unnecessary for inclusion in the Technical Specifications.

TSUP Pages 3/4.2-43 (Dresden)
TSUP Pages 3/4.2-44 (Quad Cities)
Some items from Attachment B of Reference (a) should be more explicitly described and explained.

The re-numbering of footnotes on Dresden page 3/4.2-43 and Quad Cities page 3/4.2-44 is necessary due to the resolution of Open Item Number 20 from TSUP 3/4.2 (SER dated November 20, 1995) and Open Item Number 1 from TSUP 3/4.10 (SER dated June 23, 1995) regarding SRM count rates. The proposed changes to the footnote notation is administrative in nature and does not affect proposed TS requirements.

Address Open Item 19 from the NRC staff's Safety Evaluation for TSUP 3/4.2, dated November 20, 1995.

Open Item 19 addressed TS 4.2.G.1 - footnote (b) (deletion of SRM count rate requirements). This issue is addressed in Attachment A, Item 2, of Reference (a). The proposed change eliminates the proposed TS footnote which allowed 0.7 cps with a signal-to-noise ratio of 2 for SRM operability. This change eliminates a less conservative requirement from proposed TS 3/4.2.

TSUP Pages 3/4.2-44 and -46 (Dresden)
TSUP Page 3/4.2-45 (Quad Cities)
Some items from Attachment B of Reference (a) should be more explicitly described and explained.

ComEd has proposed to revise the Title of Dresden TSUP 3/4.2.H on pages 3/4.2-44 and 3/4.2-46 to specify "Explosive Gas Monitoring." In addition, the term "The explosive monitoring nstrumentation" has been revised on page 3/4.2-44 to "The explosive gas monitoring instrumentation" in proposed Dresden LCO 3.2.H to address a typographical error. Finally, in proposed Dresden TS 3.2.H, Action 2 on page 3/4.2-44 and Quad Cities TS 3.2.H, Action 2 on page 3/4.2-45, the term "Specification 6.6.C.3" has been revised to "Specification 6.9.B". This proposed change ensures consistency with proposed TS 6.9 for Special Reports as provided in the September 1, 1995 submittal for Dresden and the September 20, 1995 submittal for Quad Cities.

TSUP Page 3/4.2-49 (Quad Cities)
Some items from Attachment B of Reference (a) should be more explicitly described and explained.

ComEd has proposed to change Quad Cities Table 3.2.I-1, Item 1, from "Drywell Pressure - (Permissive)" to "Drywell Pressure - High (Permissive)". The proposed change is administrative in nature and is consistent with the current plant terminology and more accurately describes the plant configuration.

TSUP Page B3/4.2-3 (Dresden and Quad Cities)
Some items from Attachment B of Reference (a) should be more explicitly described and explained.

ComEd has proposed to delete the last sentence in the fifth paragraph of Bases Section 3/4.2.E (page B 3/4.2-3). The originally proposed sentence "An RBM "inoperative" actuates on several inputs including: (1) nulling, (2) failure to null, (3) $< 50\%$ assigned inputs, (4) card pulled, (5) no rod selected, (6) > 1 selected and (7) switch not in operate" is superfluous design information that is inappropriate for inclusion in the Technical Specifications Bases.

TSUP Page B3/4.2-3 (Dresden and Quad Cities)
TSUP Page B3/4.2-4 should refer to Attachment A, Item 22 of Reference (a) to be consistent with Table 3.2.F-1.

ComEd agrees that page B 3/4.2-4 should reference Attachment A, Item 22 (as opposed to Item 29) of Reference (a) to be consistent with Table 3.2.F-1.

TSUP Section 3/4.3

TSUP Pages 3/4.3-12, and -14 (Dresden and Quad Cities)
Regarding CRD coupling integrity [Attachment A, Item 33 of Reference (a)], provide clarification that the proposed deletion of SR 4.3.H.1 will not allow reactor criticality prior to demonstration of the SR, be retained in order to ensure that the SR is performed prior to reactor start-up? that remain? With respect to demonstration of coupling integrity (SR 4.3.H), provide explanation for deletion of acceptance criteria.

The requirements of TSUP SR 4.3.H.1 ("CORE ALTERATIONS that could have affected the control rod drive coupling integrity") are encompassed and bounded by the requirements of SR 4.3.H.3 ("maintenance ... which could have affected the control rod drive coupling integrity"). Therefore, TSUP SR 4.3.H.1 is redundant to SR 4.3.H.3. Since SR 4.3.H.3 must be completed prior to declaring a control rod operable following maintenance, the control rod coupling integrity will be completed prior to reactor criticality. Therefore, the deletion of this requirement eliminates redundant requirements, and represents no change in existing requirements.

The acceptance criteria for the control rod coupling integrity check is more appropriate for administrative/procedural controls, and as such has been deleted. This does not represent a reduction in existing requirements to perform the control rod coupling integrity checks.

Provide a justification for the proposed changes to Page 3/4.3-12 (TS 4.3.H.2) regarding "in subsequent operation".

The term "in subsequent operation" is ambiguous and no definition for such terminology is provided in the proposed TS. The TS Applicability and corresponding Actions should suffice for providing explicit requirements as to when surveillance requirements are to be performed.

Clarify the changes from Attachment A, Item 33 of Reference (a) regarding page 3/4.3-14 (TS 4.3.I.3).

The proposed changes to TS 4.3.I.3 are inter-connected with the proposed changes to TS 4.3.H.2 since 4.3.I.3 references 4.3.H.2. The requirements of 4.3.I.3 are redundant to those specified in 4.3.H.2. TS 4.3.H.2 specifies that a control rod shall be demonstrated to be coupled (i.e., OPERABLE) anytime the rod is withdrawn to the "full out" position. TS 4.3.I.3 specifies that the control rod shall be demonstrated OPERABLE by verifying that the full out position indicator indicates "full out" when a rod is withdrawn to the "full out" position as required by 4.3.H.2. Therefore, the requirements of TS 4.3.I.3 are retained in TS 4.3.H.2 because without operable indication at the "full out" position, control rod drive coupling could not be adequately verified to satisfy TS 4.3.H.2.

TSUP Page B3/4.3-7 (Dresden and Quad Cities)
Some items from Attachment B of Reference (a) should be more explicitly described and explained.

The term "Specification 6.6.A.4" on page B 3/4.3-7 has been changed to "Specification 6.9.A.6" to accurately reference the appropriate section in TS 6.9 regarding the COLR. This proposed change ensures consistency with proposed TS 6.9 for the COLR as provided in the September 1, 1995 submittal for Dresden and the September 20, 1995 submittal for Quad Cities.

TSUP Section 3/4.5

TSUP Page 3/4.5-3, and -9 (Dresden)
TSUP Page 3/4.5-2 (Quad Cities)
Proposed changes to TS 4.5.A.4.a and 4.5.D.3 (Dresden) and 4.5.D.3.a (Quad Cities) should be described and justified in Attachment A, Item 31 of Reference (a).

ComEd agrees that item 31 should include the proposed changes to TS 4.5.A.4.a for ADS testing (Dresden TSUP Page 3/4.5-3), TS 4.5.D.3 for Isolation Condenser testing (Dresden TSUP Page 3/4.5-9, and TS 4.5.D.3.a for RCIC testing (Quad Cities TSUP Page 3/4.5-2). The aforementioned changes provide simple, concise language that clearly delineates the purpose of the surveillance and the appropriate acceptance criteria that demonstrates the functions of the system. Clarification is maintained to preclude actual injections into the reactor vessel. In addition, the proposed changes are consistent with NUREG-1433.

TSUP Page 3/4.5-3 (Dresden)
Explain the basis for referencing Dresden TSUP Page 3/4.5-3 in Attachment A, Item 9 of Reference (a).

In the Reference (a) submittal, Item 9 of Attachment A, should only refer to Quad Cities page 3/4.5-3. Attachment A, Item 9 incorrectly refers to Dresden TSUP Page 3/4.5-3.

Dresden and Quad Cities page 3/4.5-3 originally included an open item to 3.5.A, Action 2.c that specifies: "With the LPCI subsystem and one or both CS subsystems inoperable, be in at least HOT SHUTDOWN within 12 hours and in COLD SHUTDOWN within the next 24 hours." The proposed revisions to the TSUP Definition of OPERABLE and the addition of notation to 3.5.A, Actions 2.a and 2.b clarify the minimum requirements for the LPCI subsystem at Dresden Station. ComEd has evaluated the cleanup changes to the Definition of OPERABLE/OPERABILITY and the addition of footnote (d) to 3.5.A, Actions 2.a and 2.b and determined such changes sufficiently ensure that the purpose of 3.5.A, Action 2.c is fulfilled.

TSUP Page 3/4.5-5 (Quad Cities)
Some items from Attachment B of Reference (a) should be more explicitly described and explained.

The term "Specification 6.6.B.4" on Quad Cities TSUP Page 3/4.5-5 has been changed to "Specification 6.9.B" to accurately reference the appropriate section in TS 6.9 regarding the submittal of Special Reports. This proposed change ensures consistency with proposed TS 6.9 for Special Reports as provided in the September 20, 1995 submittal for Quad Cities.

TSUP Page 3/4.5-9 (Dresden)
TSUP Page 3/4.5-10 (Quad Cities)
The proposed changes to TS 4.5.D.1.a should refer to Attachment A, Item 30 of Reference (a).

ComEd agrees that for Quad Cities 4.5.D.1.a, this issue is equivalent to the discussion provided for TS 4.5.A.1.a(1) as stated in Item 30. For Dresden 4.5.D.1.a, this issue is encompassed in Item 35.

TSUP Page B 3/4.5-2 (Dresden and Quad Cities)
Some items from Attachment B of Reference (a) should be more explicitly described and explained.

ComEd has proposed to revise the last two sentences of paragraph 4 of Dresden TSUP Page B 3/4.5-2 from "...reducing system reliability provided the appropriate MAPLHGR reduction factor is applied to assure compliance with 10 CFR 50.46. The MAPLHGR reduction factors are contained in the CORE OPERATING LIMITS REPORT" to "...reducing system reliability." The reference to MAPLHGR multiplier factors is not retained in proposed TS 3/4.5 and 3/4.11; as such, the proposed change is administrative in nature and maintains consistency between the TS requirements and the TS Bases.

In addition to this administrative change ComEd has proposed to incorporate additional NUREG-1433 guidance with respect to ADS surveillance requirements to the last two sentences of paragraph 4 of Dresden and Quad Cities TSUP Page B 3/4.5-2. This change was discussed in Attachment A, Item 28 of Reference (a).

ComEd has also proposed to correct a typographical error on Dresden and Quad Cities TSUP Page B 3/4.5-2 from "Specification 3.7.G" to "Specification 3.7.K" to reflect the appropriate cross-reference for suppression chamber requirements. The proposed change is administrative in nature and does affect TS requirements.

TSUP Page B 3/4.5-3 (Dresden)
Some items from Attachment B of Reference (a) should be more explicitly described and explained.

The proposed change to Dresden page B 3/4.5-3 reflects the changes discussed in Attachment A, Item 30 (Paragraph 3) of Reference (a).

TSUP Section 3/4.6

TSUP Page 3/4.6-15 (Quad Cities)
Some items from Attachment B of Reference (a) should be more explicitly described and explained.

ComEd has proposed to delete footnote (a) on Quad Cities page 3/4.6-15. Footnote (a) provides unnecessary information and does not modify any TS requirements.

TSUP Page 3/4.6-25 and -27 (Quad Cities)
Some items from Attachment B of Reference (a) should be more explicitly described and explained.

ComEd has proposed to revise the term "pump" on Quad Cities page 3/4.6-25, footnote (b) to "subsystem" and to revise the term "loop" on Quad Cities page 3/4.6-27, footnote (b) to "subsystem". The proposed change in terminology is necessary to maintain consistency with the proposed footnotes and LCO 3.6.O and 3.6.P which refer to "subsystem". The proposed change is administrative in nature and ensures consistency in terminology between the proposed Actions and LCOs.

TSUP Page B 3/4.6-4 (Dresden)
Some items from Attachment B of Reference (a) should be more explicitly described and explained.

ComEd has proposed to delete the redundant information regarding 3/4.6.J for Specific Activity provided on Dresden page B 3/4.6-4. This information was inadvertently included on the bottom of page B 3/4.6-4 and repeated on the top of page B 3/4.6-5. As such, the proposed change is administrative in nature.

TSUP Page B 3/4.6-7 (Dresden and Quad Cities)
Some items from Attachment B of Reference (a) should be more explicitly described and explained.

ComEd has proposed to revise the term "ASTI E185-73" to "ASTM E185-73" and "Figure 3.6.J-1" to "Figure 3.6.K-1" on page B 3/4.6-7. The proposed change ensures the appropriate ASTM reference is utilized for testing/examination of irradiated reactor vessel material specimens and the appropriate Technical Specification P/T curve reference is used for pressure and temperature limits, respectively.

TSUP Page B 3/4.6-8 (Dresden and Quad Cities)
Some items from Attachment B of Reference (a) should be more explicitly described and explained.

The title of Bases section 3/4.6.L for Reactor Steam Dome Pressure (Dresden and Quad Cities TSUP Page B 3/4.-8) inadvertently omitted the term "Pressure". To be consistent with the titles for the LCO and Surveillance requirements for TS 3/4.6.L, ComEd has proposed to add the term "Pressure" to the title. The proposed change is administrative in nature and does not affect TS requirements.

TSUP Page B 3/4.6-8 (Dresden and Quad Cities)
The proposed changes to Dresden TSUP Page B 3/4.6-2, in accordance with Item 7, which is noted in Attachment B of Reference (a), should also refer to Dresden.

ComEd agrees that proposed changes to B 3/4.6-2 regarding Item 7 regarding jet pump flow patterns are applicable to Dresden Station.

TSUP Section 3/4.7

TSUP Page 3/4.7-5 (Dresden and Quad Cities)
Some items from Attachment B of Reference (a) should be more explicitly described and explained.

ComEd has proposed to revise the phrase "open simultaneously" to "opened simultaneously" on Dresden and Quad Cities TSUP Page 3/4.7-5. The proposed change is administrative in nature and maintains consistent with the terminology in current Technical Specifications (CTS) 4.7.A.8.

TSUP Page 3/4.7-12 (Dresden)
TSUP Page 3/4.7-13 (Quad Cities)
Some items from Attachment B of Reference (a) should be more explicitly described and explained.

On Dresden page 3/4.7-12 and Quad Cities page 3/4.7-13, ComEd has proposed to revise the term "< 15%" to "≤15%" to eliminate ambiguity regarding Applicability at exactly 15% of RATED THERMAL POWER. The proposed change is consistent with STS guidance and is administrative in nature.

TSUP Page 3/4.7-18 (Dresden)
TSUP Page 3/4.7-19 (Quad Cities)
Explain the open item regarding TSUP 4.7.L.2 from the staff's SER for 3/4.7, dated 11/27/95.

The CTS 4.5.B.2 requirements for Quad Cities regarding performance every five years of a water spray test of the torus spray header and nozzle have not been retained within proposed TSUP 4.7.L. Full flow

testing through the suppression pool spray nozzles is not performed because of the potential equipment damage which could be done by spraying in the suppression chamber. The proposed requirements are consistent with the guidelines proposed in STS (NUREG-0123) 4.6.2.2.d. It should be noted that this requirement is not incorporated within the CTS requirements for Dresden Station, nor is this requirement included in the NUREG-1433 requirements.

Because the elimination of this test reduces potential equipment damage caused by spraying in the containment and is consistent with the precedence of NUREG-0123, NUREG-1433 and Dresden's CTS requirements, the proposed deviation from CTS requirements does not significantly reduce existing safety margins.

TSUP Page 3/4.7-22 (Dresden)
The extension of the time between charcoal adsorber tests from 720 hours to 1440 hours is not conservative and unnacceptable to the staff.

Dresden will revise the service usage frequency of TSUP section 4.7.P.3 back to the existing value of 720 hours in forthcoming submittal. Dresden will pursue this issue outside of the upgrade effort.

TSUP Page 3/4.7-25 (Dresden and Quad Cities)
Footnote '' on Dresden and Quad Cities pages 3/4.7-25 should be deleted.*

ComEd has proposed to renumber the Action requirements for TS 3.7.P such that unnecessary 'deleted' statements are eliminated. These changes will be provided in a subsequent submittal.

TSUP Page 3/4.7-24 (Dresden)
TSUP Page 3/4.7-25(Quad Cities)
Attachment A, Item 39 of Reference (a) does not specifically discuss the proposed changes regarding ANSI 1980 vs. 1989.

This issue was discussed in Attachment A, Item 10, of Reference (a) as an administrative change. ComEd has proposed to change the reference to ANSI requirements from "ANSI N510-1980" to "ANSI N510-1989" on Dresden page 3/4.7-24 and Quad Cities page 3/4.7-25 to ensure the most appropriate ANSI reference for heater testing is utilized for Dresden and Quad Cities Station. The proposed change is administrative in nature and does not affect TS requirements.

TSUP Page B 3/4.7-7 (Dresden)
TSUP Page B 3/4.7-8 (Quad Cities)
The marked-up versions of Dresden TSUP Page B 3/4.7-7 for Dresden and page B 3/4.7-8 for Quad Cities are inconsistent with the subsequent information supplied in the revised/retyped pages.

The deletions and insertions to earlier sections of 3/4.7 Bases pages may have caused confusion. The final retyped pages submitted in Attachment C of Reference (a) eliminate any gaps or lack of continuity in the pages.

TSUP Section 3/4.8

TSUP Page 3/4.8-1 (Dresden and Quad Cities)
Explain the basis for the proposed changes specified in Attachment A, Item 11 of Reference (a) with respect to TS 3.8.A.2.a or TS 3.8.A.2.b.

The Attachment A, Item 11 should refer to proposed TS LCO "3.8.A.2" when discussing the deletion of footnote (a) instead of TS LCO "3.8.A.2.b". Footnote (a) modifies 3.8.A.2.a. However, the flow path for CCSW does include the requirements for LCO 3.8.A.2.a and 3.8.A.2.b.

TSUP Page 3/4.8-6 (Dresden and Quad Cities)
Expand the explanation regarding the change to the Control Room Emergency Filtration System (CREFS) allowed-outage-time (AOT).

Attachment A, Item 23 of Reference (a) discusses the proposed changes for the CREFS. The proposed change revises the AOT to a more conservative value (from a 14-day AOT to a 7-day AOT for the CREFS) consistent with BWR-STS (NUREG-0123, Revision 4). NUREG-0123 also specifies a 7-day AOT. As previously discussed, the proposed changes are new requirements which are not incorporated within the current Technical Specifications at Dresden Station. Because the proposed changes conservatively reduce existing plant vulnerabilities for the system, the proposed changes do not significantly reduce existing plant safety margins.

TSUP Page 3/4.8-7 (Dresden)
Service usage testing must be justified or revised

Dresden will revise the service usage frequency of TSUP section 4.8.D.3 back to origianal value of 720 hours in forthcoming submittal. Dresden will pursue this issue outside of the upgrade effort.

TSUP Page 3/4.8-14 (Dresden)
Some items from Attachment B of Reference (a) should be more explicitly described and explained.

On Dresden TSUP Page 3/4.8-14 (TS 3/4.8.F), a typographical error exists such that the phrase "failure of only on" should be changed to "failure of only one". The proposed change is administrative in nature and does not affect TS requirements.

TSUP Page 3/4.8-17 (Dresden and Quad Cities)
Some items from Attachment B of Reference (a) should be more explicitly described and explained.

ComEd has proposed to delete a cross-reference to Specification 6.5.B as described on TSUP Page 3/4.8-17. These requirements (explicit reference to record retention requirements) were not incorporated within proposed TS 6.5.B, consistent with the requirements of NUREG-1433. The explicit requirements for the record retention for Snubbers requirements are appropriate to be administratively controlled.

TSUP Section 3/4.9

TSUP Pages 3/4.9-2, -3, -4, and -5 (Dresden and Quad Cities)
Are the changes proposed to 3.9.A, Action 1.b, 3.9.A, Action 2.b ("absence of common mode failure"), 3.9.A, Action 3.b, 4.9.A.2.d, 4.9.A.7.b and 3.9.A, Action 5.a specifically addressed in Attachment A, Item 4 of Reference (a)? Expand the explanation where appropriate.

The changes proposed for 3.9.A, Action 1.b are addressed in Item 4 of Attachment A on page 3 [GL 93-05]: "Item 10.1 in Enclosure 1 to GL 93-05 recommends the following: .... (4) Delete the requirement of alternate testing that requires testing of EDG and other unrelated systems not associated with an inoperable train or subsystem (other than an inoperable EDG)." As such, the deletion of 3.9.A, Action 1.b (which requires EDG testing with an offsite circuit inoperable), is consistent with the guidance of GL 93-05.

The changes proposed for 3.9.A, Action 2.b are addressed in Item 4 of Attachment A on page 3 [GL 93-05]: "Item 10.1 in Enclosure 1 to GL 93-05 recommends the following: .... (1) When an EDG itself is inoperable (not including a support system or independently testable component), the other EDG(s) should be tested only once (not every 8 hours) and within 8 hours unless the absence of any potential common mode failure can be demonstrated;" and "(4) Delete the requirement of alternate testing that requires testing of EDG and other unrelated systems not associated with an inoperable train or subsystem (other than an inoperable EDG)." As such, the proposed changes to 3.9.A, Action 2.b (which exclude inoperability caused by the absence of common mode failure or failure associated with support system, etc.), is consistent with the guidance of GL 93-05. It should be noted that TSUP 3.9.A, Action 2.b for Dresden and Quad Cities deviates from GL 93-05 guidance by allowing a period of 24 hours to test the remaining EDG (as discussed above, GL 93-05 stated within 8 hours). This deviation is consistent with NUREG-1433 requirements and was not listed as an open item for the previously approved by the NRC staff in the SER for TSUP 3/4.9.

The changes proposed for 3.9.A, Action 3.b are addressed in Item 4 of Attachment A on page 3 [GL 93-05]: "Item 10.1 in Enclosure 1 to GL 93-05 recommends the following: (1) When an EDG itself is inoperable, the other EDG(s) should be tested only once (not every 8 hours) and within 8 hours unless the absence of any potential common mode failure can be demonstrated." As such, the proposed changes to 3.9.A, Action 3.b (which excluded inoperability caused by the absence of common failure), are consistent with the guidance of GL 93-05.

The changes proposed for 3.9.A, Action 5.a are addressed in Item 4 of Attachment A on page 3 [GL 93-05]: "Item 10.1 in Enclosure 1 to GL 93-05 recommends the following: .... (4) Delete the requirement of alternate testing that requires testing of EDG and other unrelated systems not associated with an inoperable train or subsystem (other than an inoperable EDG)." As such, the deletion of 3.9.A, Action 5.a (which requires both EDG testing with both offsite circuits inoperable), is consistent with the guidance of GL 93-05.

The changes proposed for 4.9.A.2.d are addressed in Item 4 of Attachment A on page 3 [GL 93-05]: "Item 10.1 in Enclosure 1 to GL 93-05 recommends the following: ....(2) The EDGs should be loaded in accordance with the vendor recommendations for all test purposes other than the refueling outage LOOP

tests." As such, the changes proposed for 4.9.A.2.d (which specify that the diesel generator is to be loaded in accordance with vendor/manufacturer recommendations) is consistent with the guidance of GL 93-05.

The intention of GL 93-05 is to reduce unnecessary plant surveillances. As noted in proposed TS footnote (c), surveillance requirement 4.9.A.7.b may be substituted for 4.9.A.2.d. As such, 4.9.A.7.b is redundant to the purpose of 4.9.A.2.d and therefore, is deleted from the TS in accordance with the guidance of GL 93-05.

TSUP Page 3/4.9-8 (Dresden and Quad Cities)
Expand the explanation for the difference in diesel generator starting time requirements between Dresden and Quad Cities (10 vs. 13 seconds).

The discussion regarding the proposed changes to the Quad Cities diesel generator start times are included in Item 4 of Attachment A on page 8 [Diesel Start Times]. The diesel start times are based upon LOCA analysis assumptions regarding the diesel generators. The Dresden LOCA analysis assumes a start time of 13 seconds, while the Quad Cities LOCA analysis assumes a start time of 10 seconds. As such, the proposed changes ensure LOCA analysis assumptions are maintained.

TSUP Page 3/4.9-7 (Dresden and Quad Cities)
Expand the explanation regarding the proposed changes to page 3/4.9-7 (4.9.A.8.h, 4.9.A.2.c and footnote (f)).

The discussion regarding the proposed changes to page 3/4.9-7 (4.9.A.8.h, 4.9.A.2.c and footnote (f)) are included in Item 4 of Attachment A on page 3 [GL 93-05]: "Item 10.1 in Enclosure 1 to GL 93-05 recommends the following: .... (3) The hot-start test following the 24 hour EDG test [SR 4.9.A.8.h] should be a simple EDG start test. SR 4.9.A.2.c is the applicable simple EDG start test. If the hot start test is not performed within the required 5 minutes following the 24 hour EDG test, it should not be necessary to repeat the 24 hour EDG test. The only requirement should be that the hot start test is performed within 5 minutes of operating the diesel generator at its continuous rating for 2 hours or until operating temperatures have stabilized." This is consistent with proposed TS footnote (f). The proposed changes are consistent with the guidance proposed in Generic Letter 93-05 regarding the reduction of unnecessary surveillance requirements.

TSUP Page 3/4.9-8 (Dresden and Quad Cities)
Some items from Attachment B of Reference (a) should be more explicitly described and explained.

ComEd has proposed to change the terminology for EDG logic as described on page 3/4.9-8 from "sequence timer" to "sequence logic" to reflect current plant terminology. The proposed change is administrative in nature.

TSUP Page 3/4.9-18 (Dresden and Quad Cities)
Some items from Attachment B of Reference (a) should be more explicitly described and explained.

ComEd has proposed to revise the phrase "Hot Shutdown" and "Cold Shutdown" on page 3/4.9-18 to "HOT SHUTDOWN" and "COLD SHUTDOWN," respectively. The revision from lower case to upper case clarifies ambiguities regarding Definitions. As discussed in TS 1.0, Definitions, terms specified in upper case reflect Definitions throughout the TS. Because HOT SHUTDOWN and COLD SHUTDOWN are defined in TS 1.0 (i.e., MODE 3 and MODE 4), these terms should be formatted in upper case. As such, the proposed change is administrative in nature and resolves any ambiguity associated with the Definitions.

TSUP Page B 3/4.9-1 (Dresden and Quad Cities)
Expand the discussion for the 4-kv cross-tie.

The discussion regarding the 4-kV cross-tie is included in Item 4 of Attachment A on page 5 [Bases Clarifications]: A proposed change to the Bases clarifies the requirements regarding the 4160 volt safety bus cross-tie. This change is administrative in nature and serves to clarify that either Division I or Division II 4160-volt safety bus cross-tie is acceptable to satisfy the LCO requirements. The proposed change to the Bases is consistent with the current plant design at Dresden and Quad Cities Stations.

Some items from Attachment B of Reference (a) should be more explicitly described and explained.

ComEd has proposed to revise a typographical error on Quad Cities page B 3/4.9-1. The term "Theses" should be changed to "These". The proposed change is administrative in nature and does not affect TS requirements.

TSUP Page B 3/4.9-3 (Dresden and Quad Cities)
Expand the discussion of vendor vs. manufacturer.

The discussion regarding diesel generator vendor/manufacturer requirements are included in Item 4 of Attachment A on page 5 [Bases Clarifications] and page 6 [Diesel Lubrications]. As discussed on page 5 of Attachment A: "Changes to Bases regarding the addition of the term "vendor" regarding recommendations for the diesel generator has been proposed. This change ensures that either vendor or manufacturer recommendations are to be utilized during the performance of applicable surveillances for diesel generators." As discussed on page 6 of Attachment A: "The addition of vendor requirements precludes potential conflicting requirements, where they may exist, between the diesel engine manufacturer and diesel engine vendor." Thus, the proposed requirements ensure the most appropriate diesel generator recommendations are applied at Dresden and Quad Cities Stations.

Some items from Attachment B of Reference (a) should be more explicitly described and explained.

ComEd has proposed to update references to Regulatory Guide 1.9 to reflect the appropriate revision to which the site's diesel generators are tested. The proposed change deletes reference to "draft" and changes the revision date from "1/91" to "7/93". The proposed change ensures the most appropriate testing guidance is referenced in the TS Bases and is administrative in nature.

TSUP Page B 3/4.9-7 (Dresden and Quad Cities)
The Attachment B notation for proposed changes to page B 3/4.9-7 should refer to Attachment A, Item 10 and 6, versus the reference to Item 4.

ComEd agrees with the NRC staff's assessment. The item number and page listing in Attachment B for page B 3/4.9-7 should refer to Attachment A, Items 6 and 10.

Some items from Attachment B of Reference (a) should be more explicitly described and explained.

ComEd has proposed to change page B 3/4.9-7 regarding the verification of battery cell temperatures from "representative cells" to "battery cells" to be consistent with the corresponding proposed changes for TS 4.9.C.2.c. The proposed change to the Bases is administrative in nature and does not affect TS requirements.

TSUP Section 3/4.11

TSUP Page 3/4.11-3 (Dresden and Quad Cities)
The proposed changes listed on page 3/4.11-3 for TS 4.11.C refer to the "MCPR operating limit" as compared to the "MCPR limit." Explain the difference in terminology.

The originally proposed marked-up TSUP Page 3/4.11-3 for Dresden and Quad Cities was developed prior to final NRC staff approval of the page. The final revised page reflects actual plant practices and terminology for MCPR. The proposed change ensures consistency between Dresden and Quad Cities, and is consistent with industry terminology for MCPR.

TSUP Page 3/4.11-3 (Dresden and Quad Cities)
TSUP Page B 3/4.11-2 (Dresden and Quad Cities)
Explain why the proposed marked-up pages for page 3/4.11-3 and B 3/4.11-2 do not include amendment numbers.

The submitted pages for TS 3/4.11 were utilized in the development of the marked-up pages. The omission of the amendment number reference does not affect the proposed changes nor the final typed-up version of the Bases page.

TSUP Pages B 3/4.11-1 and -2 (Dresden and Quad Cities)
Some items from Attachment B of Reference (a) should be more explicitly described and explained.

The term "Specification 6.6.A.4" on pages B 3/4.11-1 and B 3/4.11-2 has been changed to "Specification 6.9" to accurately reference the appropriate section in TS 6.9 regarding the COLR. This proposed change ensures consistency with proposed TS 6.9 for the COLR as provided in the September 1, 1995 submittal for Dresden and the September 20, 1995 submittal for Quad Cities.

TSUP Page B 3/4.11-2 (Dresden and Quad Cities)
Does Attachment A, Item 12 of Reference (a) refer to Dresden TSUP Page B 3/4.11-2?

The Attachment B notation and Attachment A description for proposed changes to Dresden TSUP Page B 3/4.11-2 should only refer to Item 10 and Item 41. In addition, the Attachment B notation and Attachment A description for proposed changes to Quad Cities page B 3/4.11-2 should also only refer to Item 10 and Item 41.