Commonwealth Edison Company
1400 Opus Place
Downers Grove, IL 60515-5701

May 10, 1996

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

ComEd

Subject: Dresden Nuclear Power Station Units 2 and 3
Quad Cities Nuclear Power Station Units 1 and 2
Supplement to Application for Amendment to Facility Operating Licenses DPR-19, DPR-25, DPR-29 and DPR-30, Appendix A, Technical Specifications for the Technical Specifications Upgrade Program (TSUP)
NRC Docket Nos. 50-237/249 and 50-254/265

References: (a) P. Piet letter to U.S. NRC, dated November 14, 1995 (ComEd submittal regarding TSUP clean-up).

(b) J. S. Perry letter to U. S. NRC, dated March 1, 1996 (ComEd submittal to resolve miscellaneous issues from the TSUP project).

(c) J. S. Perry letter to U. S. NRC, dated March 13, 1996.

(d) E. S. Kraft letter to U. S. NRC, dated March 25, 1996.

(e) J. S. Perry letter to U. S. NRC, dated March 26, 1996.

(f) J. L. Schrage letter to U. S. NRC, dated August 4, 1995.

(g) J. F. Stang letter to D. L. Farrar, dated November 20, 1995.

The purpose of this letter is to close-out additional open items identified during the period since the submittal of the Reference (a), (b) and (e) letters regarding the TSUP project and amend the list of surveillance requirements that will not be current upon TSUP implementation, which was originally submitted in Reference (d). A summary and ComEd's assessment of the proposed changes are provided as Attachment A to this letter. Marked-up pages are provided in Attachment B.

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

Additional Clarification

The NRC staff requested additional clarification regarding the open item for the SRM Upscale, CHANNEL CALIBRATION, Item 3.b in Table 4.2.E-1; the changes proposed in Reference (e) to TSUP 3/4.6.J; and the changes proposed for Quad Cities for torus spray. Additional clarification is provided below.

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SRM Upscale, 3/4.2.E

Regarding the open item for SRM Upscale, CHANNEL CALIBRATION, this issue was originally identified (Reference (f)) as an open item for Dresden Station in ComEd's response to additional information regarding TSUP 3/4.2, "Instrumentation." However, ComEd has subsequently determined that the proposed requirements for Table 4.2.E-1, Item 3.b, SRM Upscale, CHANNEL CALIBRATION are consistent with the requirements specified in the current Technical Specifications (Dresden Table 4.2.1). As such, open item 13 identified in Section 3.13 of Reference (g) can be considered closed.

Specific Activity, 3/4.6.J

Regarding additional clarification for the changes proposed in Reference (e) to TSUP 3/4.6.J, the proposed changes are consistent with NUREG-1433, Revision 1. TSUP Action 3.6.J, Action 3 only requires increased sampling of Item 3.b in Table 4.6.J-1 when the LCO is not met and THERMAL POWER or offgas levels exceed certain parameters. This Action only applies when the LCO is not met (Actions are only to be applied when the specific activity of the reactor coolant is greater than or equal to 0.2 µCi/gram DOSE EQUIVALENT I-131). This is similar to 3/4.6.J, Action 2 which requires the sampling of Item 3.a in Table 4.6.J-1. Since sampling of Item 3.a encompasses the sampling requirements of Item 3.b, the Action 3 requirement and associated Item 3.b from Table 4.6.J-1 are unnecessary. Also, the proposed 7 day frequency for the Iodine 131 surveillance is adequate to trend changes in the iodine activity level (consistent with the Bases of Surveillance Requirement 3.4.7.1 of NUREG-1433, Revision 1).

The addition of 3.6.J, footnote (a), clarifying that the provisions of 3.0.D are not applicable to the requirement to restore LCO 3.6.J to within limits within 48 hours, allows entry into the applicable MODE(S) while relying on the Actions even though the Actions may eventually require plant shutdown. This exception is consistent with NUREG-1433, Revision 1, and the Bases for NUREG-1433, Revision 1. The proposed change is acceptable due to the significant conservatism incorporated into the specific activity limit, the low probability of an event which is limiting due to exceeding this limit, and the ability to restore transient specific activity excursions while the plant remains at, or proceeds to power operation.

Torus Spray Surveillance 4.7.L

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. CTS 4.5.B.2 for Quad Cities is not retained in the Technical Specifications because the spray function for torus cooling is not a process variable, design feature, or operating restriction used as an initial condition of a design-basis accident or transient analysis. In addition, it is not a structure, system, or component that is part of a primary success path and which functions or actuates to mitigate a design-basis

accident or transient that either assumes the failure of or presents a challenge to the integrity of a fission product barrier. As such, CTS 4.5.B.2 for Quad Cities does not fall within the NRC's Final Policy Statement regarding determining whether a particular matter is required to be included within the Technical Specifications. The spray function for torus cooling is not: 1) installed instrumentation that is used to detect, and indicate in the control room, a significant abnormal degradation of the reactor coolant pressure boundary; 2) a process variable, design feature, or operating restriction that is an initial condition of a design-basis accident or transient analysis that either assumes the failure of or presents a challenge to the integrity of a fission product barrier; 3) a structure, system, or component that is part of a primary success path and which functions or actuates to mitigate a design-basis accident or transient that either assumes the failure of or presents a challenge to the integrity of a fission product barrier; 4) a structure, system or component which operating experience or probabilistic safety assessment has shown to be significant to public health and safety.

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.

Implementation of Surveillance Requirements

For Quad Cities Station, three additional surveillance requirements (SR) have been identified which will not be current upon implementation of the TSUP project. These are the Turbine Control Valve Fast Closure RPS Calibration (SR 4.1.A.1, Table 4.1.A-1, item 11), the Main Steam Line Isolation Valve Closure RPS Calibration (SR 4.1.A.1, Table 4.1.A-1, item 5), and the Reactor Mode Switch Shutdown Position RPS Response Time Test (SR 4.1.A.3, Table 3.1.A-1, item 13). ComEd requests that implementation of these surveillances, along with those previously submitted in Reference (d), be delayed until the next refuel outage for each unit. These surveillances are new for Quad Cities Station and require the reactor to be in a shutdown condition to perform.

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

Sincerely,

Peter L. Piet
Nuclear Licensing Administrator

Attachment: A. Summary and Assessment of TSUP Clean-Up Changes
B. Marked-Up TSUP Pages
C. Revised TSUP Pages

cc: H. J. Miller, Regional Administrator - RIII
J. F. Stang, Project Manager - NRR
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OFFICIAL SEAL
MARY JO YACK
NOTARY PUBLIC, STATE OF ILLINOIS
MY COMMISSION EXPIRES: 11/29/97

Mary Jo Yack 5/10/96

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PROPOSED CHANGE TO TECH SPECS RE THE TECH SPECS UPGRADE PROGRAM

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ATTACHMENT A

SUMMARY AND ASSESSMENT OF TSUP CLEAN-UP CHANGES
Dresden and Quad Cities Nuclear Power Stations

AFFECTED PAGES[a]	SITE	SUMMARY & ASSESSMENT
1-9	D/Q	ComEd proposes to clarify footnote (a) in Table 1-2 to add reactor mode switch position Refuel as an allowable position. Previously, TSUP Table 1-2 specified for footnote (a) "The reactor mode switch may be placed in the Run or Startup/Hot Standby position to test the switch interlock functions provided the control rods are verified to remain fully inserted by a second licensed operator or other technically qualified individual." Based upon the precedence of the Perry Technical Specifications and NUREG-1433 (ISTS), ComEd proposes to change footnote (a) to specify "... in the Run, Startup/Hot Standby or Refuel position ..." The same protection provided for testing with the reactor mode switch in Run or Startup/Hot Standby (e.g., all control rods fully inserted) would apply to the Refuel position. Any possible errors resulting in advertent control rod withdrawals would lead to fewer control rods having the potential to be withdrawn with the switch in Refuel (due to the one-rod-out interlock) than with the switch in one of the other allowed positions. The proposed changes are consistent with the current plant design at Dresden and Quad Cities Stations.

(a) Marked-up pages in Attachment B.

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3/4.2-3, 3/4.2-8	D/Q	ComEd proposes to change the required setpoint for the secondary containment isolation, the Reactor Building Ventilation Exhaust Radiation - High (Table 3.2.A-1, Item 2.c) monitor from 5 mR/hr to 10 mR/hr for Quad Cities and from 4 mR/hr to 10 mR/hr for Dresden Station. A revised setpoint calculation for this instrument indicates that finding a nominal setpoint for the instrument that is sufficiently above background to minimize spurious trips, but low enough to ensure that a TSUP trip setpoint requirement of 5 mR/hr would always be met is not feasible. Changing the TSUP trip setpoint requirement to 10 mR/hr allows the technicians to continue the current practice of setting the instrument in the field at such a setting that minimizes the potential for spurious trips and ensures that the instrument will trip prior to the TSUP requirement of 10 mR/hr. This meets the design basis requirement to set the instrument above background, and continues to ensure that effects to off-site dose will be insignificant. ComEd proposes to revise the CHANNEL CALIBRATION surveillance frequency at Dresden and Quad Cities, for Item 2.c in Table 4.2.A-1, Secondary Containment Isolation, Reactor Building Ventilation Exhaust Radiation - High, from 'E' (every 18 months) to 'Q' (quarterly - every 92 days). ComEd also proposes to revise the CHANNEL CALIBRATION surveillance frequency at Quad Cities for Item 2.d in Table 4.2.A-1, Secondary Containment Isolation, Refueling Floor Radiation - High, from 'E' to 'Q'. Revised setpoint calculations have shown that the originally proposed Technical Specifications CHANNEL CALIBRATION surveillance frequencies are not sufficient. This change is necessary to support the assumptions inherent in the setpoint calculations for these instruments. The proposed changes ensure that secondary containment isolation occurs such that existing plant safety margins are maintained.

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3/4.2-9	D	ComEd proposes to revise the calibration frequency for the Shutdown Cooling Isolation - Recirculation Water Temperature High (Cut-in Permissive) function from "Q", quarterly, to "E", every 18 months. This instrument is not in the CTS and has been added to TSUP to be consistent with the STS format. However, the current frequency for calibration is once per refuel, or approximately 18 months. The 18 month frequency is appropriate for retention in TSUP because performance of the calibration during plant operations will result in an added risk of inadvertent equipment operation from the main control room. In addition to control room interference, the calibration procedure requires entry into the SDC Pump room where the dose rates are significantly higher than normal reactor building background. ComEd has reviewed the past calibration performance of the subject instrument and has determined that an increased frequency is unwarranted. Therefore, increasing the frequency to quarterly will provide no additional safety benefit. Maintaining the 18 month frequency is consistent with the criteria established for reduction of unnecessary surveillances in GL 93-05. The revision of the calibration frequency is consistent with current requirements and maintains existing safety margins.
3/4.2-18, 3/4.2-20	D	ComEd proposes to revise the CHANNEL CALIBRATION surveillance frequency for the Dresden Core Spray (CS) Pump Discharge Flow - Low (Bypass) [Item 1.d in Table 4.2.B-1], from $Q^{(e)}$ to $E^{(e)}$. ComEd also proposes to revise the CHANNEL CALIBRATION surveillance frequency for Dresden LPCI Pump Discharge Flow - Low (Bypass) [Item 2.d in Table 4.2.B-1], from $Q^{(e)}$ to $E^{(e)}$. In addition, ComEd proposes to revise Table 4.2.B-1, footnote (e) to specify that the trip units are calibrated once per 92 days as opposed to once per 31 days as is currently listed. Based upon the installed instrumentation and surveillance history data, the trip units for the CS Pump Discharge Flow - Low (Bypass) and the LPCI Pump Discharge Flow - Low (Bypass) have been shown to be adequate for quarterly (every 92 days) surveillances. Based upon the installed instrumentation and surveillance history data, the transmitters for this instrumentation have been shown to be adequate for calibration every 18 months.

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3/4.2-34	D	ComEd proposes an administrative change to Items 3.a, 3.b and 3.c in Table 4.2.E-1 for Dresden Station. The proposed change revises the location of the comma in the description of the Applicable OPERATIONAL MODE(s). The proposed change revises "2,(i) 5" to "2(i), 5". As such, the proposed change eliminates any ambiguities associated with the application of footnote (i) towards Applicable OPERATIONAL MODE 2, for Source Range Monitor, Control Rod Block Instrumentation requirements. The proposed change is administrative in nature and does not adversely affect existing plant safety margins. ComEd proposes to delete reference to footnote (k) for Item 3.b in Table 4.2.E-1. This footnote was inadvertently included in the Reference (e) submittal. In addition, the CHANNEL CALIBRATION for item 3.b was originally identified as an open item by ComEd for Dresden Station. However, as previously discussed, the proposed requirements for TSUP Table 4.2.E-1, item 3.b are consistent with CTS Table 4.2.1 requirements for SRM Upscale.
3/4.4-1	Q	ComEd proposes to supersede the listing of TSUP 4.4.A.2.b included within the Reference (d) submittal for Quad Cities to maintain consistency with the originally proposed and approved requirements for the Standby Liquid Control System (Amendment Nos. 154/150, dated June 8, 1995).
B 3/4.5-3, B 3/4.5-4	D	ComEd proposes to revise the description of the Bases for TSUP 3/4.5.D for Dresden Station to maintain consistency with the Bases change performed under 10 CFR 50.59 and submitted to the NRC staff on April 4, 1996. The proposed change is administrative in nature and ensures consistency between the plant's UFSAR and the Technical Specification Bases.
B 3/4.6-4	Q	ComEd proposes to revise the description of the Bases for TSUP 3/4.6.I for Dresden and Quad Cities Station to ensure consistent terminology and format is used to describe POWER OPERATION. Because POWER OPERATION is defined in TSUP 1.0, upper case format is appropriate. The proposed change is administrative in nature.
B 3/4.6-5	D	See above for Quad Cities B 3/4.6-4.

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3/4.7-4	D/Q	ComEd proposes to supersede the listing of TSUP 4.7.C.1 included within the Reference (d) submittal for Quad Cities and the Reference (c) submittal for Dresden to maintain consistency with the originally proposed and approved requirements for changes incorporating Option B to 10 CFR 50, Appendix J (Amendment Nos. 148/142 for Dresden and Amendment Nos. 169/165 for Quad Cities, dated January 11, 1996).
3/4.7-21	Q	Com Ed proposes to revise TSUP 4.7.N.1 regarding the periodic verification of secondary containment integrity for Quad Cities Station. TSUP 4.7.N.1 requires that secondary containment be checked every 24 hours to ensure pressure within secondary containment is maintained at ≥ 0.25 inches of water vacuum gauge. ComEd proposes to change the requirement to verify secondary containment every 24 hours at ≥ 0.25 inches of water vacuum gauge to ≥ 0.10 inches of water vacuum gauge. The normal reactor building ventilation was not designed at Quad Cities Station to maintain ≥ 0.25 inches of water vacuum gauge. Per UFSAR section 9.4.7, the reactor building ventilation was designed to maintain between 0.10 and 0.25 inches of water vacuum gauge. During accident conditions, the normal reactor building ventilation isolates and the standby gas treatment system starts and maintains secondary containment integrity with ≥ 0.25 inches of water vacuum gauge. The periodic verification provided by TSUP 4.7.N.3 verifies on a periodic basis (every 18 months) that the standby gas treatment system and the reactor building maintain design basis requirements. Verifying every 24 hours (TSUP 4.7.N.1) that the reactor building ventilation maintains margin to its design function (maintain reactor building/secondary containment at ≥ 0.10 inches of water vacuum gauge) will provide the assurance that secondary containment is intact. Therefore, the proposed change maintains existing plant safety margins and is acceptable for Quad Cities Station.

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[D] 3/4.7-24, [Q] 3/4.7-25	D/Q	ComEd proposes to revise TSUP Surveillance Requirement 4.7.P.4.c to eliminate design details for the SBGT system which are inappropriate for inclusion in the Technical Specifications. System design details are more appropriately controlled by site administrative procedures, Technical Specification Bases, or the UFSAR; changes to which the provisions of 10 CFR 50.59 are sufficient. As such, ComEd proposes to change 4.7.P.4.c to eliminate unnecessary design details. The current TSUP requirements specify that the heaters dissipate 30 ± 3 kw when tested in accordance with ANSI N510-1989. Current TSUP 4.7.P.4.c also includes clarification that this reading shall include the appropriate correction for variations from 480 volts at the bus. ComEd proposes to change this clarification to state "This reading shall include the appropriate correction for variations in voltage." The requirements to specifically delineate the heater ratings and corresponding bus voltages are unnecessary design details, inappropriate for inclusion in the Technical Specifications. Plant procedures are a more appropriate means for controlling surveillance methodologies. In addition, the Technical Specification Bases or plant UFSAR are more appropriate controls over system design details. The proposed change is administrative in nature as plant configuration and operations are unaffected by the proposed change. The proposed change relocates system design details and procedural methodologies, which are inappropriate for inclusion within the Technical Specifications, to administrative controls. As such, because the proposed change is administrative in nature and does not adversely affect plant operation and does not alter the physical configuration of the plant, the proposed change does not reduce existing plant safety margins.

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3/4.9-5	D/Q	ComEd proposes to revise TSUP 4.9.A.8.c regarding the limitations for diesel generator voltage requirements during or following the load rejection surveillance. The originally proposed requirements specify that the generator voltage shall not exceed 5000 volts during or following the load rejection. ComEd proposes to revise the voltage requirements to include notation that clarifies that momentary transients above the maximum voltage limit do not invalidate this test. The proposed change to 5000 volts (including notation that specifies that momentary transients above the maximum voltage limit do not invalidate this test) is consistent with the diesel generator design requirements at Dresden and Quad Cities Stations and ensures that proper system function is maintained by the revised acceptance criteria. Proposed TSUP 4.9.A.8.c is a new surveillance requirement not currently included within the Dresden or Quad Cities Technical Specifications. Because the proposed changes maintain existing safety margins and are consistent with existing plant design requirements, the proposed changes are acceptable for Dresden and Quad Cities Stations.
3/4.9-14	D	ComEd proposes to revise the terminology in Dresden TSUP 4.9.C.5 to eliminate ambiguities associated with the acceptance criteria for the 60 month battery capacity surveillance. The proposed change specifies the minimum acceptable battery capacity requirement by including "... verify that the battery capacity is *at least* 80% of the manufacturer's rating..." The inclusion of the words "at least" clarifies that achieving a battery capacity of 80% or greater satisfies the surveillance requirement. The proposed change is administrative in nature and consistent with the terminology specified for similar surveillances for Quad Cities Station.
3/4.10-9	D	ComEd proposes to supersede page 3/4.10-9 for Dresden to maintain consistency with the originally proposed and approved requirements for the Refueling Operations, Water Level - Reactor Vessel (Amendment Nos. 136/130, dated June 23, 1995).
6-12a	Q	ComEd proposes to correct a discrepancy identified in Quad Cities TS 6.8.D.5.a, on page 6-12a regarding the subscript nomenclature for L_a. Amendment Nos. 169/165, dated January 11, 1996, and Amendment Nos. 170/166, dated April 2, 1996, TS 6.8.D.5.a incorrectly refer to "0.60 La". The correct reference is "0.60 L_a". The proposed change is an administrative correction of nomenclature and does not affect the requirements for Primary Containment Leakage Rate acceptance criteria.