



June 14, 1996

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

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

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

(b) P. Piet letter to U.S. NRC, dated May 10, 1996.

(c) Teleconference between representatives of the NRC staff and
ComEd, dated June 11, 1996.

The purpose of this letter is to resolve items discussed between ComEd and the NRC staff during the Reference (c) teleconference. The items discussed involved issues in ComEd's Reference (a) and (b) submittals. A summary and ComEd's assessment of these issues are provided below. Marked-up pages are provided in Attachment A, with revised pages 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 implementation of the entire TSUP project.

The NRC staff requested additional clarification regarding proposed Technical Specification (TS) 3.9.A, Actions 2.b and 3.b; Surveillance Requirement (SR) 4.9.A.8.b; SR 4.9.A.8.c, footnote (g); and the reportability of EDG failures. These issues are discussed below.

TS 3.9.A, Actions 2.b and 3.b

In Reference (a), ComEd proposed deleting the term "preventive" from TS 3.9.A, Actions 2.b and 3.b. As discussed in Reference (a), the intent of this exclusion is to require additional testing only in those cases where a potential for a common mode failure exists.

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As discussed during the Reference (c) teleconference, ComEd proposes to withdraw the proposed change to TS 3.9.A, Actions 2.b and 3.b that delete the term "preventive." For any such inoperability, a determination by ComEd that the cause of any inoperability is absent any potential common mode failure for the remaining diesel generator by the administrative verification of logs or other pertinent information should suffice as a demonstration. The physical performance of the surveillance requirements to demonstrate OPERABILITY in such cases is not required. Revised pages are provided in Attachment B to this letter.

SR 4.9.A.8.b

Based on the Reference (c) teleconference, to maintain consistency with other SR located within TS 4.9.A, ComEd proposes to revise the diesel generator speed requirements in SR 4.9.A.8.b (i.e., rpm) and utilize frequency notation (i.e., Hz). The proposed change revises "...while maintaining speed ≤ 1001 rpm..." to "... while maintaining frequency ≤ 66.73 Hz..." 66.73 Hz is equivalent to 1001 rpm. The proposed change is administrative in nature and maintains consistency with other SR within TS 4.9.A. Marked-up pages highlighting the proposed change in terminology are provided in Attachment A to this letter. Revised pages are provided in Attachment B to this letter.

SR 4.9.A.8.c

In Reference (c), ComEd proposed adding footnote (g) to SR 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 proposed 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.

This surveillance demonstrates the diesel generator's capability to reject a full load without overspeed tripping or exceeding the predetermined voltage limits. The diesel generator full load rejection may occur because of a system fault or inadvertent breaker tripping. This surveillance ensures proper engine generator load response under the simulated test conditions. This test simulates the loss of the total connected load that the diesel generator experiences following a full load rejection and verifies that the diesel generator does not trip upon loss of the load. These acceptance criteria provide diesel generator damage protection. While the diesel generator is not expected to experience this transient during an event, and continues to be available, this response ensures that the diesel generator is not degraded for future application, including reconnection to the bus if the trip initiator can be corrected or isolated.

Following initiation of the surveillance, the Dresden and Quad Cities diesel generators experience a momentary spike of voltage (with a duration of approximately less than 2 seconds). Voltage variations above 5000 volts for an extended period of time is indicative of a failed surveillance test. A momentary spike in voltage during the performance of the subject surveillance test is not deleterious to the operability of the diesel generator. This momentary spike has not been shown to have any adverse residual effects on the system design capabilities of the diesel generator. The proposed footnote ensures that such a spike of voltage during the initiation of the SR does not invalidate the required TS test.

EDG Reporting

As discussed in Reference (a), Generic Letter (GL) 94-01 specified that licensees may propose changes to remove special reporting requirements for EDGs from their plant TS and continue to comply with the provisions of 10 CFR 50.72 and 50.73. In lieu of any such special EDG reporting requirements, the provisions specified by 10 CFR 50.72 and 50.73 suffice for Dresden and Quad Cities Stations.

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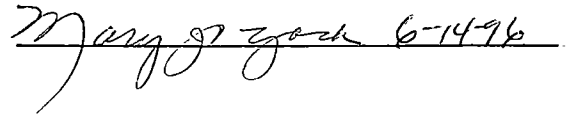
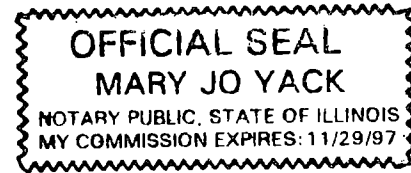
If there are any questions concerning this matter, please contact this office.

Sincerely,



Peter L. Piet

Nuclear Licensing Administrator



Attachment: A. Marked-Up TSUP Pages
B. Revised TSUP Pages

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