LIMITING CONDITIONS FOR OPERATION AND SURVEILLANCE REQUIREMENTS

BASES

SECTION PAGE

TABLE 1-2

OPERATIONAL MODES

MODE	MODE SWITCH POSITION[f]	AVERAGE REACTOR COOLANT TEMPERATURE
1. POWER OPERATION	Run	Any temperature
2. STARTUP	Startup/Hot Standby	Any temperature
3. HOT SHUTDOWN	Shutdown[a,e]	> 212°F[d]
4. COLD SHUTDOWN	Shutdown[a,b,e]	≤ 212°F
5. REFUELING[c]	Shutdown or Refuel[a,d]	≤ 140°F

TABLE NOTATIONS

(a) The reactor mode switch may be placed in the Run, Startup/Hot Standby, or Refuel 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.

(b) The reactor mode switch may be placed in the Refuel position while a single control rod drive is being removed from the reactor pressure vessel per Specification 3.10.I.

(c) Fuel in the reactor vessel with one or more vessel head closure bolts less than fully tensioned or with the head removed.

(d) See Special Test Exceptions 3.12.A, and 3.12.B. and 3.12.C

(e) The reactor mode switch may be placed in the Refuel position while a single control rod is being moved provided the one-rod-out interlock is OPERABLE.

(f) When there is no fuel in the reactor vessel, the reactor is considered not to be in any OPERATIONAL MODE. The reactor mode switch may then be in any position or may be inoperable.

BASES

3/4.12.A PRIMARY CONTAINMENT INTEGRITY

The requirement for PRIMARY CONTAINMENT INTEGRITY is not applicable during the period when open vessel tests are being performed during the low power PHYSICS TESTS. Low power PHYSICS TESTS during OPERATIONAL MODE 2 may be required to be performed while still maintaining access to the primary containment and reactor pressure vessel. Additional requirements during these tests to restrict reactor power and reactor coolant temperature provide protection against potential conditions which could require primary containment or reactor coolant pressure boundary integrity.

3/4.12.B SHUTDOWN MARGIN Demonstrations

Performance of SHUTDOWN MARGIN demonstrations with the vessel head removed requires additional restrictions in order to ensure that criticality does not occur. These additional restrictions are specified in this LCO. SHUTDOWN MARGIN tests may be performed while in OPERATIONAL MODE 2 in accordance with Table 1-2 without meeting this Special Test Exception. For SHUTDOWN MARGIN demonstrations performed while in OPERATIONAL MODE 5, additional requirements must be met to ensure that adequate protection against potential reactivity excursions is available. Because multiple control rods will be withdrawn and the reactor will potentially become critical, the approved control rod withdrawal sequence must be enforced by the RWM, or must be verified by a second licensed operator or other technically qualified individual. To provide additional protection against inadvertent criticality, control rod withdrawals that are "out-of-sequence", i.e., do not conform to the Banked Position Withdrawal Sequence, must be made in individual notched withdrawal mode to minimize the potential reactivity insertion associated with each movement. Because the reactor vessel head may be removed during these tests, no other CORE ALTERATION(s) may be in progress. This Special Test Exception then allows changing the Table 1-2 reactor mode switch position requirements to include the Startup or Hot Standby position such that the SHUTDOWN MARGIN demonstrations may be performed while in OPERATIONAL MODE 5.

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3.12 - LIMITING CONDITIONS FOR OPERATION

C. Inservice Leak and Hydrostatic Testing Operation

The average reactor coolant temperature specified in Table 1-2 for OPERATIONAL MODE 4 may be changed to "NA," and operation considered not to be in OPERATIONAL MODE 3; and the requirements of LCO 3.6.P, "Residual Heat Removal - COLD SHUTDOWN," may be suspended, to allow performance of an inservice leak or hydrostatic test provided the following OPERATIONAL MODE 3 LCOs are met:

1. LCO 3.2.A, "Isolation Actuation ", Table 3.2.A-1, Functional Unit Number 2, "SECONDARY CONTAINMENT ISOLATION.";
2. LCO 3.7.N, "SECONDARY CONTAINMENT INTEGRITY";
3. LCO 3.7.O, "Secondary Containment Automatic Isolation Dampers"; and
4. LCO 3.7.P, "Standby Gas Treatment System."

APPLICABILITY:

OPERATIONAL MODE 4 with average reactor coolant temperature >212°F.

ACTION:

With one or more of the above requirements[a] not met:

1. Immediately enter the applicable ACTION of the affected LCO[b], or
2. Immediately suspend activities that could increase the average reactor coolant temperature or pressure, and reduce average reactor coolant temperature to ≤212°F within 24 hours.

4.12 - SURVEILLANCE REQUIREMENTS

C. Inservice Leak and Hydrostatic Testing Operation

Perform the applicable surveillance requirements for the required OPERATIONAL MODE 3 LCOs in accordance with the frequency of the applicable surveillance requirements.

a. Separate ACTION entry is allowed for each requirement of the LCO.

b. Required ACTIONs to be in OPERATIONAL MODE 4 include reduce average coolant temperature ≤ 212°F.

INSERT A

3/4.12.C Inservice Leak and Hydrostatic Testing Operation

The purpose of this Special Test Exception LCO is to allow certain reactor coolant pressure tests to be performed in OPERATIONAL MODE 4 when the metallurgical characteristics of the reactor pressure vessel (RPV) require pressure testing at temperatures > 212°F, which normally corresponds to OPERATIONAL MODE 3.

Pressure Testing required by Section XI of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code are performed prior to startup after a refueling outage. The minimum temperatures (at the required pressures) allowed for these tests are determined from the RPV pressure and temperature (P/T) limits required by LCO 3.6.K, "Pressure/Temperature Limits." These limits are conservatively based on the fracture toughness of the reactor vessel, taking into account anticipated vessel neutron fluence. With increased reactor vessel fluence over time, the minimum allowable vessel temperature increases at a given pressure. Pressure testing will eventually be required with minimum reactor coolant temperatures > 212°F.

Allowing the reactor to be considered in OPERATIONAL MODE 4 during pressure testing, when the reactor coolant temperature is > 212°F, effectively provides an exception to OPERATIONAL MODE 3 requirements, including OPERABILITY of primary containment and the full complement of redundant Emergency Core Cooling Systems. Since the pressure tests are performed at low decay heat values, and near OPERATIONAL MODE 4 conditions, the stored energy in the reactor core will be low. Under these conditions, the potential for failed fuel and a subsequent increase in coolant activity above LCO 3.6.J, "Specific Activity," limits are minimized. In addition, secondary containment will be OPERABLE, in accordance with this Special Test Exception LCO, and will be capable of handling any airborne radioactivity or steam leaks that could occur during the performance of pressure testing. The required pressure testing conditions provide adequate assurance that the consequences of a steam leak will be conservatively bounded by the consequences of the postulated main steam line break outside of primary containment described in the UFSAR. Therefore, these requirements will conservatively limit radiation releases to the environment.

In the event of a large primary system leak, the reactor vessel would rapidly depressurize, allowing the low pressure core cooling systems to operate. The capability of the low pressure coolant injection and core spray subsystems, as required in OPERATIONAL MODE 4 by LCO 3.5.B, "ECCS Shutdown," would be more than adequate to keep the core flooded under this low decay heat load condition. Minor system leaks would be detected by leakage inspections before significant inventory loss occurred.

For the purposes of this Special Test Exception, the protection provided by normally required OPERATIONAL MODE 4 applicable LCOs, in addition to the secondary containment requirements required to be met by this Special Test Exception LCO, will ensure acceptable consequences during normal pressure test conditions and during postulated accident conditions.

Special Test Exception LCOs provide flexibility to perform certain operations by appropriately modifying requirements of other LCOs. A discussion of the criteria satisfied for the other LCOs is provided in their respective Bases. Compliance with this Special Test Exception LCO is optional. Operation at reactor coolant temperatures > 212°F can be in accordance with Table 1-2 for OPERATIONAL MODE 3 operation without meeting this Special Test Exception LCO or its ACTIONs.

If it is desired to perform these tests while complying with this Special Test Exception LCO, then the OPERATIONAL MODE 4 applicable LCOs and specified OPERATIONAL MODE 3 LCOs must be met. This Special Test Exception LCO allows changing Table 1-2 temperature limits for OPERATIONAL MODE 4 to "NA" and suspending the

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requirements of LCO 3.6.P, "Residual Heat Removal - COLD SHUTDOWN". The additional requirements for secondary containment LCOs to be met will provide sufficient protection for operations at reactor coolant temperatures > 212°F for the purpose of performing pressure testing.

This LCO allows primary containment to be open for frequent unobstructed access to perform inspections, and for outage activities on various systems to continue consistent with the OPERATIONAL MODE 4 applicable requirements that are in effect immediately prior to and immediately after this operation.

The OPERATIONAL MODE 4 requirements may only be modified for the performance of inservice pressure tests so that these operations can be considered as in OPERATIONAL MODE 4, even though the reactor coolant temperature is > 212°F. The additional requirement for secondary containment OPERABILITY according to the imposed OPERATIONAL MODE 3 requirements provides conservatism in the response of the unit to any event that may occur. Operations in all other OPERATIONAL MODES are unaffected by this LCO.

Footnote (a) has been provided to modify the ACTIONs related to pressure testing operation. Footnote (a) allows a separate condition entry for each requirement of the LCO.

If an LCO specified in LCO 3.12.C is not met, the ACTIONs applicable to the stated requirements are entered immediately. ACTION 1 has been modified by Footnote (b) that clarifies the intent of another LCO's ACTION to be in OPERATIONAL MODE 4 which includes reducing the average reactor coolant temperature to ≤ 212°F.

ACTION 2 is an alternate action that can be taken instead of ACTION 1 to restore compliance with the normal OPERATIONAL MODE 4 requirements, and thereby exit this Special Test Exception LCO's Applicability. Activities that could further increase reactor coolant temperature or pressure are suspended immediately, in accordance with ACTION 2, and the reactor coolant temperature is reduced to establish normal OPERATIONAL MODE 4 requirements. The allowed completion time of 24 hours for ACTION 2 provides sufficient time to reduce the average reactor coolant temperature from the highest expected value to ≤ 212°F with normal cooldown procedures. The completion time is also consistent with the time provided in LCO 3.0.C to reach OPERATIONAL MODE 4 from OPERATIONAL MODE 3.

The applicable LCOs are required to have their Surveillances met to establish that this LCO is being met. A discussion of the applicable surveillance requirements is provided in their respective Bases.

LIMITING CONDITIONS FOR OPERATION AND SURVEILLANCE REQUIREMENTS

BASES

TABLE 1-2

OPERATIONAL MODES

MODE	MODE SWITCH POSITION[f]	AVERAGE REACTOR COOLANT TEMPERATURE
1. POWER OPERATION	Run	Any temperature
2. STARTUP	Startup/Hot Standby	Any temperature
3. HOT SHUTDOWN	Shutdown[a,e]	> 212°F (d)
4. COLD SHUTDOWN	Shutdown[a,b,e]	≤ 212°F
5. REFUELING[c]	Shutdown or Refuel[a,d]	≤ 140°F

TABLE NOTATIONS

(a) The reactor mode switch may be placed in the Run, Startup/Hot Standby, or Refuel 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.

(b) The reactor mode switch may be placed in the Refuel position while a single control rod drive is being removed from the reactor pressure vessel per Specification 3.10.I.

(c) Fuel in the reactor vessel with one or more vessel head closure bolts less than fully tensioned or with the head removed.

(d) See Special Test Exceptions 3.12.A and 3.12.B. (3) and 3.12.C

(e) The reactor mode switch may be placed in the Refuel position while a single control rod is being moved provided the one-rod-out interlock is OPERABLE.

(f) When there is no fuel in the reactor vessel, the reactor is considered not to be in any OPERATIONAL MODE. The reactor mode switch may then be in any position or may be inoperable.

BASES

3/4.12.A PRIMARY CONTAINMENT INTEGRITY

The requirement for PRIMARY CONTAINMENT INTEGRITY is not applicable during the period when open vessel tests are being performed during the low power PHYSICS TESTS. Low power PHYSICS TESTS during OPERATIONAL MODE 2 may be required to be performed while still maintaining access to the primary containment and reactor pressure vessel. Additional requirements during these tests to restrict reactor power and reactor coolant temperature provide protection against potential conditions which could require primary containment or reactor coolant pressure boundary integrity.

3/4.12.B SHUTDOWN MARGIN Demonstrations

Performance of SHUTDOWN MARGIN demonstrations with the vessel head removed requires additional restrictions in order to ensure that criticality does not occur. These additional restrictions are specified in this LCO. SHUTDOWN MARGIN tests may be performed while in OPERATIONAL MODE 2 in accordance with Table 1-2 without meeting this Special Test Exception. For SHUTDOWN MARGIN demonstrations performed while in OPERATIONAL MODE 5, additional requirements must be met to ensure that adequate protection against potential reactivity excursions is available. Because multiple control rods will be withdrawn and the reactor will potentially become critical, the approved control rod withdrawal sequence must be enforced by the RWM, or must be verified by a second licensed operator or other technically qualified individual. To provide additional protection against inadvertent criticality, control rod withdrawals that are "out-of-sequence", i.e., do not conform to the Banked Position Withdrawal Sequence, must be made in individual notched withdrawal mode to minimize the potential reactivity insertion associated with each movement. Because the reactor vessel head may be removed during these tests, no other CORE ALTERATION(s) may be in progress. This Special Test Exception then allows changing the Table 1-2 reactor mode switch position requirements to include the Startup or Hot Standby position such that the SHUTDOWN MARGIN demonstrations may be performed while in OPERATIONAL MODE 5.

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3.12 - LIMITING CONDITIONS FOR OPERATION	4.12 - SURVEILLANCE REQUIREMENTS
C. Inservice Leak and Hydrostatic Testing Operation	C. Inservice Leak and Hydrostatic Testing Operation
The average reactor coolant temperature specified in Table 1-2 for OPERATIONAL MODE 4 may be changed to "NA," and operation considered not to be in OPERATIONAL MODE 3; and the requirements of LCO 3.6.P, "Shutdown Cooling - COLD SHUTDOWN," may be suspended, to allow performance of an inservice leak or hydrostatic test provided the following OPERATIONAL MODE 3 LCOs are met:	Perform the applicable surveillance requirements for the required OPERATIONAL MODE 3 LCOs in accordance with the frequency of the applicable surveillance requirements.

1. LCO 3.2.A, "Isolation Actuation ", Table 3.2.A-1, Functional Unit Number 2, "SECONDARY CONTAINMENT ISOLATION";
2. LCO 3.7.N, "SECONDARY CONTAINMENT INTEGRITY";
3. LCO 3.7.O, "Secondary Containment Automatic Isolation Dampers"; and
4. LCO 3.7.P, "Standby Gas Treatment System."

APPLICABILITY:

OPERATIONAL MODE 4 with average reactor coolant temperature >212°F.

ACTION:

With one or more of the above requirements[a] not met:

1. Immediately enter the applicable ACTION of the affected LCO[b], or
2. Immediately suspend activities that could increase the average reactor coolant temperature or pressure, and reduce average reactor coolant temperature to ≤212°F within 24 hours.

a. Separate ACTION entry is allowed for each requirement of the LCO.

b. Required ACTIONs to be in OPERATIONAL MODE 4 include reduce average coolant temperature ≤ 212°F.

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3/4.12.C Inservice Leak and Hydrostatic Testing Operation

The purpose of this Special Test Exception LCO is to allow certain reactor coolant pressure tests to be performed in OPERATIONAL MODE 4 when the metallurgical characteristics of the reactor pressure vessel (RPV) require the pressure testing at temperatures > 212°F, which normally corresponds to OPERATIONAL MODE 3.

Pressure Testing required by Section XI of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code are performed prior to startup after a refueling outage. The minimum temperatures (at the required pressures) allowed for these tests are determined from the RPV pressure and temperature (P/T) limits required by LCO 3.6.K, "Pressure/Temperature Limits." These limits are conservatively based on the fracture toughness of the reactor vessel, taking into account anticipated vessel neutron fluence. With increased reactor vessel fluence over time, the minimum allowable vessel temperature increases at a given pressure. Pressure testing will eventually be required with minimum reactor coolant temperatures > 212°F.

Allowing the reactor to be considered in OPERATIONAL MODE 4 during pressure testing, when the reactor coolant temperature is > 212°F, effectively provides an exception to OPERATIONAL MODE 3 requirements, including OPERABILITY of primary containment and the full complement of redundant Emergency Core Cooling Systems. Since the pressure tests are performed at low decay heat values, and near OPERATIONAL MODE 4 conditions, the stored energy in the reactor core will be low. Under these conditions, the potential for failed fuel and a subsequent increase in coolant activity above LCO 3.6.J, "Specific Activity," limits are minimized. In addition, secondary containment will be OPERABLE, in accordance with this Special Test Exception LCO, and will be capable of handling any airborne radioactivity or steam leaks that could occur during the performance of pressure testing. The required pressure testing conditions provide adequate assurance that the consequences of a steam leak will be conservatively bounded by the consequences of the postulated main steam line break outside of primary containment described in the UFSAR. Therefore, these requirements will conservatively limit radiation releases to the environment.

In the event of a large primary system leak, the reactor vessel would rapidly depressurize, allowing the low pressure core cooling systems to operate. The capability of the low pressure coolant injection and core spray subsystems, as required in OPERATIONAL MODE 4 by LCO 3.5.B, "ECCS Shutdown," would be more than adequate to keep the core flooded under this low decay heat load condition. Minor system leaks would be detected by leakage inspections before significant inventory loss occurred.

For the purposes of this Special Test Exception, the protection provided by normally required OPERATIONAL MODE 4 applicable LCOs, in addition to the secondary containment requirements required to be met by this Special Test Exception LCO, will ensure acceptable consequences during normal pressure test conditions and during postulated accident conditions.

Special Test Exception LCOs provide flexibility to perform certain operations by appropriately modifying requirements of other LCOs. A discussion of the criteria satisfied for the other LCOs is provided in their respective Bases. Compliance with this Special Test Exception LCO is optional. Operation at reactor coolant

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temperatures > 212°F can be in accordance with Table 1-2 for OPERATIONAL MODE 3 operation without meeting this Special Test Exception LCO or its ACTIONs.

If it is desired to perform these tests while complying with this Special Test Exception LCO, then the OPERATIONAL MODE 4 applicable LCOs and specified OPERATIONAL MODE 3 LCOs must be met. This Special Test Exception LCO allows changing Table 1-2 temperature limits for OPERATIONAL MODE 4 to "NA" and suspending the requirements of LCO 3.6.P, "Shutdown Cooling - COLD SHUTDOWN". The additional requirements for secondary containment LCOs to be met will provide sufficient protection for operations at reactor coolant temperatures > 212°F for the purpose of performing pressure testing.

This LCO allows primary containment to be open for frequent unobstructed access to perform inspections, and for outage activities on various systems to continue consistent with the OPERATIONAL MODE 4 applicable requirements that are in effect immediately prior to and immediately after this operation.

The OPERATIONAL MODE 4 requirements may only be modified for the performance of inservice pressure tests so that these operations can be considered as in OPERATIONAL MODE 4, even though the reactor coolant temperature is > 212°F. The additional requirement for secondary containment OPERABILITY according to the imposed OPERATIONAL MODE 3 requirements provides conservatism in the response of the unit to any event that may occur. Operations in all other OPERATIONAL MODES are unaffected by this LCO.

Footnote (a) has been provided to modify the ACTIONs related to pressure testing operation. Footnote (a) allows a separate condition entry for each requirement of the LCO.

If an LCO specified in LCO 3.12.C is not met, the ACTIONs applicable to the stated requirements are entered immediately. ACTION 1 has been modified by Footnote (b) that clarifies the intent of another LCO's ACTION to be in OPERATIONAL MODE 4 which includes reducing the average reactor coolant temperature to ≤ 212°F.

ACTION 2 is an alternate action that can be taken instead of ACTION 1 to restore compliance with the normal OPERATIONAL MODE 4 requirements, and thereby exit this Special Test Exception LCO's Applicability. Activities that could further increase reactor coolant temperature or pressure are suspended immediately, in accordance with ACTION 2, and the reactor coolant temperature is reduced to establish normal OPERATIONAL MODE 4 requirements. The allowed completion time of 24 hours for ACTION 2 provides sufficient time to reduce the average reactor coolant temperature from the highest expected value to ≤ 212°F with normal cooldown procedures. The completion time is also consistent with the time provided in LCO 3.0.C to reach OPERATIONAL MODE 4 from OPERATIONAL MODE 3.

The applicable LCOs are required to have their Surveillances met to establish that this LCO is being met. A discussion of the applicable Surveillance Requirements is provided in their respective Bases.

ATTACHMENT C
SIGNIFICANT HAZARDS CONSIDERATION

ComEd has evaluated the proposed Technical Specification Amendment and determined that it does not represent a significant hazards consideration. Based on the criteria for defining a significant hazards consideration established in 10 CFR 50.92, operation of Dresden Units 2 and 3 or Quad Cities Units 1 and 2 in accordance with the proposed amendment will not:

1) *Involve a significant increase in the probability or consequences of an accident previously evaluated because of the following:*

The proposed amendment represents the addition of a Special Test Exception to perform Pressure Testing Operations consistent with the requirements of Section 3.10.1 of the Improved Standard Technical Specifications (NUREG-1433). The proposed changes are consistent with the current plant safety analyses. Implementation of these changes will provide continued assurance that specified parameters associated with Pressure Testing Operations will remain within their acceptance limits, and as such, will not significantly increase the probability or consequences of a previously evaluated accident.

The proposed changes are based on the requirements specified by Section 3.10.1 of NUREG-1433. Any such changes are consistent with the current plant safety analyses and have been determined to represent sufficient requirements for the assurance and reliability of equipment assumed to operate in the safety analyses, or provide continued assurance that specified parameters associated with Pressure Testing Operations 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 affecting Pressure Testing Operations related to this proposed amendment are not assumed in any safety analyses to initiate any accident sequence; therefore, the probability of any accident previously evaluated is not increased by this proposed amendment which incorporates the requirements of Section 3.10.1 of NUREG-1433. In addition, the proposed limiting conditions for operation and surveillance requirements for the proposed amendment ensure a level of equipment operability sufficient to mitigate any operational occurrences which could occur while operating under this Special Test Exception. Furthermore, any operational occurrence postulated during operation under this Special Test Exception is bounded by the Design Basis Accidents. Therefore, the proposed amendment does not increase the consequences of any accident previously evaluated.

There is no change to the consequences of an accident previously evaluated because Pressure Testing Operations does not adversely affect either the on-site or off-site dose consequences resulting from an accident. In addition, Pressure Testing Operations is not an accident initiator. As such, there is no adverse impact on the probability of accident initiators. Thus, there is no significant increase in the probability of any previously analyzed accident.

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

The proposed amendment represents the conversion of current Technical Specification requirements to maintain consistency with those requirements specified in Section 3.10.1 of NUREG-1433. The proposed changes are consistent with the current plant safety analyses. These proposed changes do not involve revisions to the design of the station. In addition, the proposed limiting conditions for operation

and surveillance requirements for the proposed amendment ensure a level of equipment operability sufficient to mitigate any operational occurrences which could occur while operating under the Special Test Exception. Some of the changes may involve revision in the testing of components at the station; however, these are in accordance with the current plant safety analyses. The proposed changes will not introduce new failure mechanisms beyond those already considered in the current plant safety analyses.

The associated systems that affect Pressure Testing Operations related to the proposed amendment, are not assumed in any plant safety analysis to initiate any accident sequence. In addition, the proposed surveillance requirements for any such affected systems are consistent with the requirements of Section 3.10.1 of NUREG-1433. Therefore, the possibility of a new or different kind of accident from any accident previously evaluated is not created.

3) *Involve a significant reduction in the margin of safety because:*

ComEd proposes to revise the Technical Specifications to be consistent with those provisions specified in Section 3.10.1 of NUREG-1433. The proposed changes are consistent with current plant safety analyses. In addition, these proposed changes do not involve revisions to the design of the station. As such, the proposed individual changes will maintain the same level of reliability of the equipment associated with Pressure Testing Operations, assumed to operate in the plant safety analysis, or provide continued assurance that specified parameters affecting, will remain within their acceptance limits. Therefore, the proposed changes provide continued assurance of Pressure Testing Operations without adversely affecting the public health and safety and as such, will not significantly reduce existing plant safety margins .

The proposed amendment to the Technical Specifications implements present requirements, or the requirements in accordance with the guidelines set forth in Section 3.10.1 of NUREG-1433. The proposed changes have been evaluated and found to be acceptable for use at the stations based on system design, safety analysis requirements, and operational performance. Since the proposed changes are based on NRC accepted provisions that are applicable at the stations and maintain necessary levels of system or component reliability affecting Pressure Testing Operations, the proposed changes do not involve a significant reduction in the margin of safety.

Guidance has been provided in "Final Procedures and Standards on No Significant Hazards Considerations," Final Rule, 51 FR 7744, for the application of standards to license change requests for determination of the existence of significant hazards considerations. This document provides examples of amendments which are and are not considered likely to involve significant hazards considerations.

This proposed amendment does not involve a significant relaxation of the criteria used to establish safety limits, a significant relaxation of the bases for the limiting safety system settings or a significant relaxation of the bases for the limiting conditions for operations. Therefore, based on the guidance provided in the Federal Register and the criteria established in 10 CFR 50.92(c), the proposed change does not constitute a significant hazards consideration.

ATTACHMENT C
SIGNIFICANT HAZARDS CONSIDERATION

ENVIRONMENTAL ASSESSMENT

ComEd has evaluated the proposed amendment against the criteria for identification of licensing and regulatory actions requiring environmental assessment in accordance with 10 CFR 51.21. It has been determined that the proposed changes meet the criteria for a categorical exclusion as provided under 10 CFR 51.22 (c)(9). This conclusion has been determined because the 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 effluents that may be released off-site. Additionally, this request does not involve a significant increase in individual or cumulative occupational radiation exposure.