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ComEd

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U.S. Nuclear Regulatory Commission
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Dresden Nuclear Power Station, Units 2 and 3
Facility Operating License Nos. DPR-19 and DPR-25
NRC Docket Nos. 50-237 and 50-249

Quad Cities Nuclear Power Station, Units 1 and 2
Facility Operating License Nos. DPR-29 and DPR-30
NRC Docket Nos. 50-254 and 50-265

Subject: Change to a Commitment in an NRC Approved Technical Specification Change Request

Reference: (1) Letter from P. L. Piet (ComEd) to U.S. NRC, "Response to NRC Staff Request for Additional Information (RAI) Regarding the Technical Specification Upgrade Program (TSUP) Section 3/4.5, "Emergency Core Cooling Systems," dated July 28, 1995

The purpose of this letter is to inform the NRC of a change to a commitment made by Commonwealth Edison (ComEd) Company in Reference 1 concerning the implementation of Footnote (c) of Technical Specifications (TS) Section 3/4.5.A, "Emergency Core Cooling System - Operating."

TS Specification 3/4.5.A includes Surveillance Requirements (SRs) for the periodic testing of the High Pressure Coolant Injection (HPCI) system. High pressure testing (i.e., conducted, at reactor vessel pressures between 920 psig and 1005 psig) specified by TS SR 4.5.A.2.c is conducted as a part of the Inservice Testing (IST) program test (i.e., TS Section 4.0.E). TS SR 4.5.A.3.b.1 specifies a low pressure test (i.e., conducted at a reactor vessel pressure between 150 psig and 180 psig) to be performed every 18 months.

Both TS SRs are qualified by TS Section 3/4.5.A, Footnote (c), which states:

> **"The provisions of Specification 4.0.D are not applicable provided the surveillance is performed within 12 hours after reactor steam pressure is adequate to perform the test."**

TS Section 4.0.D precludes entry into an OPERATIONAL MODE or other specified condition unless applicable TS SRs have been met. Footnote (c) provides an exception to TS Section 4.0.D. This exception provides the necessary flexibility to establish the operating conditions necessary to perform HPCI surveillances.

In ComEd's response (Reference 1) to an NRC Request for Additional Information (RAI) concerning the Technical Specification Upgrade Program submittal for TS Section 3/4.5, Footnote (c) was presented as conservative with respect to the previous TS requirements. This conclusion was with regard to actions that would be taken in the event a HPCI test being performed during startup failed. The previous TS SRs for Dresden Nuclear Power Station would have required an immediate shutdown if either the low or the high pressure tests had failed. The previous TS SRs for Quad Cities Nuclear Power Station would have required an immediate shutdown if the low pressure test had failed, and would have allowed entry into the 14-day allowed outage time for an inoperable HPCI system if the high pressure test had failed. Consequently, for the Upgraded TS requirement to be conservative with respect to the previous TS SRs, failure of either the high pressure or the low pressure test at either site would require an immediate shutdown to less than 150 psig reactor pressure (i.e., below the pressure for applicability of the TS).

ComEd has performed a review concerning the proper implementation of TS Section 3/4.5.A, Footnote (c). Footnote (c) provides the necessary operational flexibility (i.e., mode changes) to establish the plant conditions required for HPCI surveillance testing. This allowance is acceptable because the time required to satisfactorily perform the test is short (i.e., the surveillance must be performed within 12 hours of establishing conditions adequate to perform the test). Should either the high pressure or the low pressure flow tests fail, ComEd has determined that a more appropriate implementation of the footnote is to enter the 14-day TS allowed outage time for the HPCI system (i.e., TS Section 3.5.A, Action 3). This action is consistent with TS 3.0.A which requires that associated ACTION requirements be met upon failure to meet a Limiting Condition for Operation (i.e., HPCI is inoperable upon failure of the test). This revised implementation is consistent with actions taken by other licensees, and is consistent with actions taken when a HPCI high pressure flow test fails during operation. This is also consistent with the improved Standard Technical Specifications (i.e., NUREG-1433). The provisions of Specification 4.0.D apply upon failure of the test. This precludes further increases in power that would cause entry into an OPERATIONAL MODE or other specified condition, until the TS SR can be satisfied.

Should you have any questions concerning this letter please contact Mr. Bob Rybak at (630) 663-7286.

Respectfully,

R.M. Krich
Vice President - Regulatory Services

cc: Regional Administrator - NRC Region III
NRC Senior Resident Inspector - Dresden Nuclear Power Station
NRC Senior Resident Inspector - Quad Cities Nuclear Power Station