



December 17, 1998

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D. C. 20555-0001

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

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

LaSalle County Station, Units 1 and 2
Facility Operating License Nos. NPF-11 and NPF-18
NRC Docket Nos. 50-373 and 50-374

Subject: Request for License Amendment
Returning Equipment to Service to Demonstrate Operability

Reference: John T. Harrison (USNRC) letter to T. C. Feigenbeum (North Atlantic Energy Service Corporation) dated June 16, 1998, "Issuance of Amendment No. 57 to Facility Operating License No. NPF-86, Seabrook Station, Unit No. 1"

In accordance with 10 CFR 50.90, Commonwealth Edison (ComEd) Company is proposing a change to the Technical Specifications (TS) for Quad Cities Nuclear Power Station, Units 1 and 2, Dresden Nuclear Power Station, Units 2 and 3, and LaSalle County Station, Units 1 and 2.

This proposed change modifies the existing TS Section 3/4.0, "Applicability," by adopting a new Limiting Condition for Operation (LCO) that is consistent with the Improved Standard Technical Specifications (ISTS), NUREG-1433, Revision 1. Specifically, the proposed change adopts ISTS LCO 3.0.5, which provides an administrative enhancement to the TS by allowing the testing required to return equipment to service to be conducted under administrative controls. The NRC recently approved a similar TS change for the Seabrook Station (see reference).

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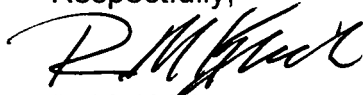
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The proposed TS change, which is included as Attachments 1 through 4, has been reviewed and approved by ComEd On-Site and Off-Site Review in accordance with ComEd procedures. Information is provided in the enclosure to support a finding that the proposed change does not involve a significant hazards consideration pursuant to 10 CRR 50.92.

ComEd requests that the proposed TS change be reviewed and approved by the NRC by May 15, 1999. ComEd is notifying the State of Illinois of this proposed TS change by transmitting a copy of this letter and its attachments to the designated state official.

If you have any questions concerning this letter, please contact Mr. B. Rybak at (630) 663-7286.

Respectfully,



R. M. Krich
Vice President-Regulatory Services

- Attachment 1 - Description and Evaluation of Proposed Changes
- Attachment 2 - Marked-up Technical Specifications Pages
- Attachment 3 - Evaluation of No Significant Hazards Consideration
- Attachment 4 - Environmental Assessment Applicability Review

cc: Regional Administrator - Region III
NRC Senior Resident Inspector - Quad Cities Nuclear Power Station
NRC Senior Resident Inspector - Dresden Nuclear Power Station
NRC Senior Resident Inspector - LaSalle County Station
Office of Nuclear Facility Safety - IDNS

STATE OF ILLINOIS

IN THE MATTER OF

COMMONWEALTH EDISON (COMED) COMPANY

QUAD CITIES NUCLEAR POWER STATION - UNITS 1 AND 2

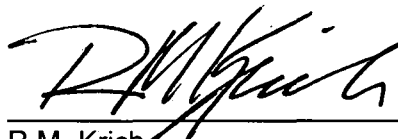
DRESDEN NUCLEAR POWER STATION - UNITS 2 AND 3

LASALLE COUNTY SATION - UNITS 1 AND 2

Docket Nos. 50-254
50-265
50-237
50-249
50-373
50-374

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I affirm that the content of this transmittal is true and correct to the best of my knowledge, information and belief.

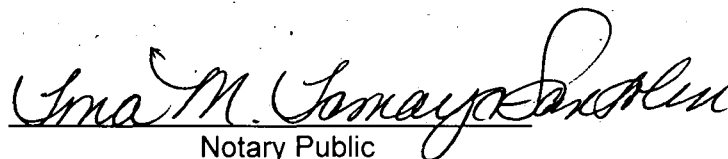
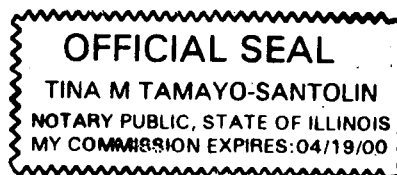


R.M. Krich
Vice President - Regulatory Services

Subscribed and sworn to before me, a Notary Public in and

for the State above named, this 17th day of

December, 1998.


Notary Public

Attachment 1

Description and Evaluation of Proposed Changes (Page 1 of 7)

A. SUMMARY OF PROPOSED CHANGES

In accordance with 10 CFR 50.90, Commonwealth Edison (ComEd) Company proposes a change to the Technical Specifications (TS) at Quad Cities Nuclear Power Station, Dresden Nuclear Power Station, and LaSalle County Station. The proposed change is administrative in nature and incorporates Limiting Condition for Operation (LCO) 3.0.5 from the Boiling Water Reactor (BWR) Improved Standard Technical Specifications (ISTS) (i.e., NUREG 1433, Revision 1). The adoption of ISTS LCO 3.0.5 will allow equipment to be returned to service, under administrative controls, for the purposes of completing testing required to demonstrate operability. In addition, TS LCO 3.0.A and 3.0.B (Dresden and Quad Cities) and 3.0.1 and 3.0.2 (LaSalle) will be modified to reflect this exception.

B. DESCRIPTION OF THE CURRENT REQUIREMENTS

The current requirements for LCO applicability are provided in TS Section 3/4.0 and are based on the original standard technical specifications. TS LCOs 3.0.A and 3.0.B [3.0.1 and 3.0.2 at LaSalle] state:

- Compliance with the Limiting Conditions for Operation contained in the succeeding Specifications is required during the OPERATIONAL MODE(s) [CONDITIONS] or other conditions specified therein; except that upon failure to meet the Limiting Conditions for Operation, the associated ACTION requirements shall be met.
- Noncompliance with a Specification shall exist when the requirements of the Limiting Condition for Operation and associated ACTION requirements are not met within the specified time intervals. If the Limiting Condition for Operation is restored prior to expiration of the specified time intervals, completion of the ACTION requirements is not required.

Compliance with the above requirements does not provide adequate operational flexibility during situations when equipment declared inoperable and placed in a condition specified by the ACTION requirements must be returned to service to complete post-maintenance testing/surveillances to demonstrate operability. The act of returning the equipment to service is in conflict with the ACTION. An example of demonstrating operability of equipment is taking an inoperable instrument channel out of the tripped condition to complete functional testing.

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Description and Evaluation of Proposed Changes

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C. BASES FOR THE CURRENT REQUIREMENTS

Specifications 3.0.A and 3.0.B for Quad Cities Nuclear Power Station and Dresden Nuclear Power Station (3.0.1 and 3.0.2 for LaSalle County Station) establish the requirements for complying with the Limiting Conditions for Operation specified in the TS.

Specification 3.0.A for Quad Cities and Dresden (3.0.1 for LaSalle) establishes that the Applicability statement within each individual specification provides the requirement for when conformance to the Limiting Conditions for Operation is required for safe operation of the facility. The ACTION requirements establish those remedial measures that must be taken within specified time limits when the requirements of a Limiting Condition for Operation are not met.

Specification 3.0.B for Quad Cities and Dresden (3.0.2 for LaSalle) establishes that noncompliance with a specification exists when the requirements of the Limiting Condition for Operation are not met and the associated ACTION requirements have not been implemented within the specified time interval.

D. NEED FOR REVISION OF THE REQUIREMENT

Compliance with the applicability requirements discussed above do not provide adequate operational flexibility during situations when equipment declared inoperable and placed in a condition specified by ACTION requirements must be returned to service to complete post-maintenance testing/surveillances to demonstrate operability.

ISTS LCO 3.0.5 was incorporated into NUREG-1433, Revision 1, to address conditions when ACTION requirements do not literally allow equipment to be returned to service to complete operability testing. ISTS LCO 3.0.5 provides the administrative controls to ensure the time the equipment is returned to service is limited to the time necessary to complete the required testing. ISTS LCO 3.0.5 is not intended to allow time to perform any other preventative or corrective maintenance.

E. DESCRIPTION OF THE PROPOSED CHANGES

For Quad Cities Nuclear Power Station and Dresden Nuclear Power Station, Specifications 3.0.A and 3.0.B are proposed, consistent with ISTS, to be changed as follows:

3.0.A Compliance with the Limiting Conditions for Operation contained in the succeeding Specifications is required during the OPERATIONAL MODE(s) or other conditions specified

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therein; except that upon failure to meet the Limiting Conditions for Operation, the associated ACTION requirements shall be met, except as provided in Specification 3.0.E.

3.0.B Noncompliance with a Specification shall exist when the requirements of the Limiting Condition for Operation and associated ACTION requirements are not met within the specified time intervals, except as provided in Specification 3.0.E. If the Limiting Condition for Operation is restored prior to expiration of the specified time intervals, completion of the ACTION requirements is not required.

A new LCO requirement, Specification 3.0.E, is added as follows:

3.0.E Equipment removed from service or declared inoperable to comply with ACTIONS may be returned to service under administrative control solely to perform testing required to demonstrate its OPERABILITY or the OPERABILITY of other equipment. This is an exception to Specification 3.0.A and 3.0.B for the system returned to service under administrative control to perform the testing required to demonstrate OPERABILITY.

Finally, the Bases for Section 3/4.0 have been modified to include the bases for proposed Specification 3.0.E, consistent with ISTS, as follows:

Specification 3.0.E establishes the allowance for restoring equipment to service under administrative controls when it has been removed from service or declared inoperable to comply with ACTIONS. The sole purpose of this Specification is to provide an exception to Specification 3.0.A and 3.0.B (e.g., to not comply with the applicable Action(s)) to allow the performance of Surveillance Requirements to demonstrate:

- a) The OPERABILITY of the equipment being returned to service; or*
- b) The OPERABILITY of other equipment.*

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Description and Evaluation of Proposed Changes (Page 4 of 7)

The administrative controls ensure the time the equipment is returned to service in conflict with the requirements of the ACTIONS is limited to the time absolutely necessary to perform the allowed Surveillance Requirements. This Specification does not provide time to perform any other preventive or corrective maintenance.

An example of demonstrating the OPERABILITY of the equipment being returned to service is reopening a containment isolation valve that has been closed to comply with Actions and must be reopened to perform the Surveillance Requirements.

An example of demonstrating the OPERABILITY of other equipment is taking an inoperable channel or trip system out of the tripped condition to prevent the trip function from occurring during the performance of a Surveillance Requirement on another channel in the other trip system. A similar example of demonstrating the OPERABILITY of other equipment is taking an inoperable channel or trip system out of the tripped condition to permit the logic to function and indicate the appropriate response during the performance of a Surveillance Requirement on another channel in the same trip system.

For LaSalle County Station, Specifications 3.0.1 and 3.0.2 are proposed to be changed, consistent with ISTS, as follows:

- 3.0.1. Compliance with the Limiting Conditions for Operation contained in the succeeding Specifications is required during the OPERATIONAL CONDITIONS or other conditions specified therein; except that upon failure to meet the Limiting Conditions for Operation, the associated ACTION requirements shall be met, except as provided in Specification 3.0.6.*

- 3.0.2. Noncompliance with a Specification shall exist when the requirements of the Limiting Condition for Operation and associated ACTION requirements are not met within the specified time intervals, except as provided in Specification 3.0.6. If the Limiting Condition for Operation is restored prior*

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Description and Evaluation of Proposed Changes (Page 5 of 7)

to expiration of the specified time intervals, completion of the ACTION requirements is not required.

A new LCO requirement, Specification 3.0.6, will be added as follows:

3.0.6 Equipment removed from service or declared inoperable to comply with ACTIONS may be returned to service under administrative control solely to perform testing required to demonstrate its OPERABILITY or the OPERABILITY of other equipment. This is an exception to Specification 3.0.1 and 3.0.2 for the system returned to service under administrative control to perform the testing required to demonstrate OPERABILITY.

Finally, the Bases for Section 3/4.0 have been modified to include the bases for proposed Specification 3.0.6, consistent with ISTS, as follows:

Specification 3.0.6 This specification establishes the allowance for restoring equipment to service under administrative controls when it has been removed from service or declared inoperable to comply with ACTIONS. The sole purpose of this Specification is to provide an exception to Specification 3.0.1 and 3.0.2 (e.g., to not comply with the applicable Action(s)) to allow the performance of Surveillance Requirements to demonstrate:

- a) The OPERABILITY of the equipment being returned to service; or*
- b) The OPERABILITY of other equipment.*

The administrative controls ensure the time the equipment is returned to service in conflict with the requirements of the ACTIONS is limited to the time absolutely necessary to perform the allowed Surveillance Requirements. This Specification does not provide time to perform any other preventive or corrective maintenance.

An example of demonstrating the OPERABILITY of the equipment being returned to service is reopening a containment isolation valve that has been closed to comply

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with Actions and must be reopened to perform the Surveillance Requirements.

An example of demonstrating the OPERABILITY of other equipment is taking an inoperable channel or trip system out of the tripped condition to prevent the trip function from occurring during the performance of a Surveillance Requirement on another channel in the other trip system. A similar example of demonstrating the OPERABILITY of other equipment is taking an inoperable channel or trip system out of the tripped condition to permit the logic to function and indicate the appropriate response during the performance of a Surveillance Requirement on another channel in the same trip system.

These proposed changes are consistent with ISTS.

F. SAFETY ANALYSIS OF THE PROPOSED CHANGES

The changes proposed by this TS amendment request are administrative in nature. The proposed changes have been included in ISTS, which have been approved for use at a number of utilities. The purpose of the proposed change is to provide the necessary administrative controls to perform testing that is required to return equipment back into service. The proposed Specification 3.0.E (3.0.6 at LaSalle County Station) provides an exception to Specification 3.0.A and 3.0.B (3.0.1 and 3.0.2 at LaSalle County Station) solely intended to allow the performance of surveillance testing to demonstrate operability. These administrative controls enhance overall plant safety by returning systems or components important to safety to operable status in a timely manner and provides greater assurance that such systems are returned and maintained in an operable status. To allow the performance of Surveillance Requirements to demonstrate the operability of the equipment being returned to service, or to demonstrate the operability of other equipment, which otherwise cannot be performed without returning the equipment to service, the exception to Specifications 3.0.A and 3.0.B (3.0.1 and 3.0.2 at LaSalle County Station) is necessary. Without this allowance, certain components could not be restored to operable status and a plant shutdown would ensue. It is not the intent of the TS to preclude the return to service of a component in order to confirm its operability or the operability of other equipment. This allowance is deemed to be a safer operation than requiring a plant shutdown to complete necessary testing. This allowance is considered acceptable because it: 1) is temporary; 2) accompanied by appropriate administrative controls, and; 3) provides a safety enhancement by restoring the plant status to, or confirming the existing plant status is in, a condition that is expected to provide for safe operation.

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Inclusion of this provision of ISTS LCO 3.0.5 into the Dresden Nuclear Power Station, Quad Cities Nuclear Power Station, and LaSalle County Station Technical Specifications provides the operational flexibility necessary to return equipment to a fully operable status by completing the necessary surveillances to demonstrate operability. This represents an enhancement to overall plant safety by providing a clear mechanism for returning equipment to service in a timely fashion, and minimizes the potential for plant trips or transients.

Attachment 2
Marked-up Technical Specifications Pages