



January 8, 1999

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

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: Additional Information to Support Relocation of the Reactor Protection System Technical Specification Requirements for Shorting Links

Reference: Letter from R. M. Krich (ComEd) to U. S. NRC, "Request for an Amendment to Technical Specifications Sections 3/4.1.A, 'Reactor Protection System (RPS),' 3/4.10.B, 'Refueling Operations, Instrumentation,' and 3/4.12.B, 'SHUTDOWN MARGIN Demonstrations,'" dated November 30, 1998.

The referenced letter transmitted an amendment request for both Dresden Nuclear Power Station (DNPS) and Quad Cities Nuclear Power Station (QCNPS) that requested relocation of Technical Specifications (TS) provisions that control the Reactor Protection System (RPS) "shorting links" to licensee administrative control. The Nuclear Regulatory Commission (NRC) requested that ComEd provide a specific method for controlling the RPS shorting links. Both DNPS and QCNPS plan to control the use of the RPS shorting links by relocating the TS requirements into the Updated Final Safety Analysis Report (UFSAR) in addition to the resultant procedural changes. Therefore, any future changes to the manner in which RPS shorting link are handled will be reviewed in accordance with the requirements of 10 CFR 50.59.

Additionally, the review performed by the NRC on the proposed changes to DNPS and QCNPS TS Bases for the RPS raised questions concerning the breadth of the Bases that were proposed for deletion. Specifically, the proposed changes to TS 3/4.1 Bases deleted, in entirety, a discussion of the Source Range Monitor (SRM) function. A concern raised by the NRC was that the Bases for the SRM function appeared to be deleted completely from the TS.

9901190177 990108  
PDR ADOCK 05000237  
P PDR

ADD 1/1

January 8, 1999  
U. S. Nuclear Regulatory Commission  
Page 2

We have reviewed the TS for both DNPS and QCNPS for other SRM functions and confirmed that the proposed changes to TS Bases Section 3/4.1 for RPS are appropriate and do not require additional revision. The changes to TS Bases Section 3/4.1 transmitted in the referenced letter deleted the Bases discussion for the SRM reactor scram function and the non-coincident neutron monitoring functions which are enabled by the shorting links. The SRMs have no other input into RPS, and other SRM functions are discussed in the appropriate sections of the TS or TS Bases. For example, the SRM TS requirements that are not related to the RPS are delineated in TS Sections 3/4.2.E, "Control Rod Block Actuation," 3/4.2.F, "Accident Monitoring," and 3/4.2.G, "Source Range Monitoring." The TS provisions for SRM functions required during refueling are located in TS Section 3/4.10.B, "Refueling Operations Instrumentation."

Should 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 - Affidavit

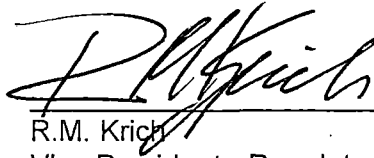
cc: Regional Administrator – NRC Region III  
NRC Senior Resident Inspector – Dresden Nuclear Power Station  
NRC Senior Resident Inspector – Quad Cities Nuclear Power Station

STATE OF ILLINOIS )  
IN THE MATTER OF )  
COMMONWEALTH EDISON (COMED) COMPANY ) Docket Nos.  
DRESDEN NUCLEAR POWER STATION – UNITS 2 AND 3 ) 50-237 and 50-249  
QUAD CITIES NUCLEAR POWER STATION – UNITS 1 AND 2 ) 50-254 and 50-265

**SUBJECT: “Additional Information to Support Relocation of the Reactor Protection System  
Technical Specification Requirements for Shorting Links”**

**AFFIDAVIT**

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

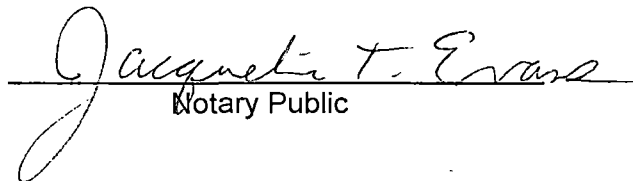


R.M. Krich  
Vice President - Regulatory Services

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

for the State above named, this 8<sup>th</sup> day of

January, 19 99.



Notary Public

