

# UNITED STATES NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 172 TO FACILITY OPERATING LICENSE NO. DPR-19,

AMENDMENT NO. 167 TO FACILITY OPERATING LICENSE NO. DPR-25,

AMENDMENT NO. 184 TO FACILITY OPERATING LICENSE NO. DPR-29,

AMENDMENT NO. 181 TO FACILITY OPERATING LICENSE NO. DPR-30,

AMENDMENT NO. 132 TO FACILITY OPERATING LICENSE NO. NPF-11 AND

AMENDMENT NO. 117 TO FACILITY OPERATING LICENSE NO. NPF-18

COMMONWEALTH EDISON COMPANY

<u>AND</u>

MIDAMERICAN ENERGY COMPANY

DRESDEN NUCLEAR POWER STATION, UNITS 2 AND 3,

QUAD CITIES NUCLEAR POWER STATION, UNITS 1 AND 2, AND

LASALLE COUNTY STATION, UNITS 1 AND 2

DOCKET NOS. 50-237, 50-249, 50-254, 50-265, 50-373 AND 50-374

#### 1.0 INTRODUCTION

By letter dated December 17, 1998, the Commonwealth Edison Company (ComEd, the licensee) submitted a license amendment request, "Returning Equipment to Service to Demonstrate Operability." The requested changes would modify the Technical Specifications (TS) for the Dresden, Quad Cities and LaSalle stations, to incorporate administrative controls which are currently approved for use in NUREG-1433, Revision 1, "Standard Technical Specifications - General Electric Plants, BWR/4." New TS 3.0.E provides an exception to TSs 3.0.A and 3.0.B, for Dresden and Quad Cities and new TS 3.0.6 provides an exception to TSs 3.0.1 and 3.0.2 for LaSalle, to return equipment to service under administrative control to demonstrate its operability or the operability of other equipment. This exception applies only to

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equipment that has been placed out of service, or declared inoperable, to comply with TS ACTION statements.

### 2.0 BACKGROUND

This license amendment request has been submitted in accordance with 10 CFR 50.90. Presently, the TS do not explicitly state the administrative controls necessary to return certain types of equipment to service that were removed from service, or declared inoperable, in order to comply with a TS ACTION statement.

For certain types of equipment, it is necessary to return that equipment to service for the purpose of demonstrating that the equipment, or that other equipment, is operable through post-maintenance testing or surveillances. For example, a containment isolation valve that was closed to comply with an ACTION statement must be opened to demonstrate its operability. Another example is an inoperable instrument channel such as the main steam high radiation monitors that were placed in a tripped state to comply with an ACTION statement need to be removed from a tripped condition to complete functional testing to demonstrate the operability of another channel in the same system. Consequently, the current TSs may prevent placing certain types of equipment back into service which may reduce the margin of safety and preclude appropriate and necessary testing.

Therefore, the licensee has requested to incorporate the administrative controls currently approved for use in NUREG-1433, Revision 1, "Standard Technical Specifications - General Electric Plants, BWR/4."

### 3.0 EVALUATION

The proposed change is to add Specification 3.0.E[6] (unique changes to LaSalle are indicated by []), along with the Bases, to the Dresden, Quad Cities, and LaSalle station's TSs and revise Specifications 3.0.A[1] and 3.0.B[2] to reference Specification 3.0.E[6] as an exception.

Specification 3.0.E[6] states:

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[1] and 3.0.B[2] for the system returned to service under administrative control to perform the testing required to demonstrate OPERABILITY.

The Bases for Specification 3.0.E[6] states:

<u>Specification 3.0.E[6]</u> 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[1] and 3.0.B[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 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.

The proposed change by the licensee is consistent with NUREG-1433, Revision 1, in that it provides the necessary administrative controls that are required to perform the testing to return certain types of equipment back into service. These new administrative controls may enhance overall plant safety by returning systems or components important to safety to operable status in a more timely manner. Therefore, the proposed changes are acceptable.

### 4.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Illinois State official was notified of the proposed issuance of the amendments. The State official had no comments.

### 5.0 ENVIRONMENTAL CONSIDERATION

The amendments change a requirement with respect to the installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20. The NRC staff has determined that the amendments involve no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendments involve no significant hazards consideration, and there has been no public comment on such finding (64 FR 4153). Accordingly, the amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendments.

## 6.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendments will not be inimical to the common defense and security or to the health and safety of the public.

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