Commonwealth Edison
One First National Plaza, Chicago, Illinois
Address Reply to: Post Office Box 767
Chicago, Illinois 60690

October 22, 1981

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U.S. NUCLEAR REGULATORY COMMISSION

Mr. T. A. Ippolito, Chief
Operating Reactors - Branch 2
Division of Operating Reactors
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Subject: Dresden Station Units 2 and 3
Quad Cities Station Units 1 and 2
Response to Request for Information
Concerning SDV Vent and Drain
Valve Technical Specifications
NRC Docket Nos. 50-237/249 and
50-254/265

References (a): T. A. Ippolito letter to L. O. DelGeorge dated September 2, 1981

(b): R. F. Janecek letter to Director of NRR dated October 14, 1980

Dear Mr. Ippolito:

Commonwealth Edison has received your Reference (a) request for additional information concerning our Reference (b) proposed Technical Specification changes pertaining to Scram Discharge Volume (SDV) vent and Drain Valves. Although you only requested information for Dresden Units 2 and 3, our response includes Quad Cities Units 1 and 2 as well, since the questions are directly applicable.

Your requests and our responses are provided in the attachment to this letter.

Please address any further questons you may have in this regard to this office.

One (1) signed original and fifty-nine (59) copies of this transmittal are provided for your use.

Very truly yours,

Thomas J. Rausch

Thomas J. Rausch
Nuclear Licensing Administrator
Boiling Water Reactors

Attachment

cc: RIII Inspector, Dresden
RIII Inspector, Quad Cities

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Attachment
Commonwealth Edison Company
Dresden Units 2 and 3
Quad Cities Units 1 and 2

Response to Request for Information Concering
SDV Vent and Drain Valve Technical Specifications

CONCERN 1.

Commonwealth Edison's response in paragraph 3 does not contain the requirement of the Model Technical Specifications of paragraph 4.1.3.1.1b to cycle each valve at least one complete cycle of full travel at least once per 31 days.

REQUEST 1.

Provide technical bases why the requested change is not applicable to Dresden Nuclear Power Station Units 2 and 3.

Response:

The model Technical Specifications that were used as a reference to develop our submittal were attached to the July 7, 1980 letter from D. Eisenhut to all operating BWR licensees. The Franklin Research Center model Tehnical Specifications for Section 4.1.3.1.1 are not the same as the July 7, 1980 model Technical Specifications. In addition, the July 7, 1980, model Technical Specifications were incorrect concerning the SDV vent/drain valve closure during individual CRD scram timing. The July 7, 1980, model Technical Specifications were modified to ensure a meaningful test is performed each refueling. A possible means of modifying our submittal would be to require verification of valve closure and subsequent re-opening during each scram, and take credit for that. In summary it is our contention that our proposal is meaningful and provides a true test of the system.

REQUEST 2.

The Technical Specifications for Dresden 2 and 3 state that each reactor protection system scram discharge volume water level-high instrumentation channel containing a limit switch shall be demonstrated OPERABLE by the performance of the CHANNEL FUNCTIONAL TEST once per 3 months, and there are not tech specs for CHANNEL CALIBRATION. Since the proposed frequency of the required surveillance for Dresden Nuclear Power Station Units 2 and 3 differs from the frequency requested by the Model Technical Specifications, provide technical bases for it.

RESPONSE

The proposed Technical Specifications regarding the SDV scram and rod block level switches are adequate. A monthly functional test of the SDV scram bypass would require the reactor mode switch to be placed in either SHUTDOWN or REFUEL for the test, and this unreasonable.

REQUEST 3.

Provide technical basis for not calibrating the scram discharge volume water level-high instrumentation channel. Also provide technical basis for performing the scram trip bypassed instrumentation channel functional test once per refueling outage instead of once per month as requested in the Model Technical Specifications.

RESPONSE

Magnetrol level switches are not, and cannot, be calibrated. Therefore, calibration frequency in our submittal is designated as "Not Applicable" for the scram discharge volume water level high channel.

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