



Commonwealth Edison
One First National Plaza, Chicago, Illinois
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September 18, 1980

Director of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Subject: Dresden Station Units 1, 2, and 3
Quad Cities Station Units 1 and 2
Proposed Amendments to Technical
Specifications, Appendix A to
Operating Licenses DPR-19, 25, 29,
and 30.
NRC Docket Nos. 50-10/237/249 and
50-254/265

Reference (a): D. G. Eisenhut letter to all Boiling
Water Reactor Licensees dated July 2, 1980.

Dear Sir:

Reference (a) requested submittal of Technical Specification changes pertaining to the implementation of the TMI-2 Lessons Learned Category "A" items. Per that request, and pursuant to 10 CFR 50.59, Commonwealth Edison proposes to amend Appendix A, Technical Specifications, to Operating Licenses DPR-19, 25, 29, and 30 for Dresden 2, Dresden 3, Quad Cities 1, and Quad Cities 2, respectively. Due to the extended shutdown of Dresden 1 and the postponed implementation of Category "A" items, Technical Specifications pertaining to those items will be submitted 90 days prior to scheduled startup of Dresden 1.

The proposed changes to the Technical Specifications are included in Attachments 1, 2, 3, and 4 for Dresden 2, 3 and Quad Cities 1, 2, respectively. These proposed changes have received on-site and off-site review and approval.

No changes have been proposed relating to the Emergency Power Supply/Inadequate Core Cooling and Containment Isolation requirements, since our review of existing Technical Specification requirements indicated adequate agreement with those requirements proposed by Reference (a). The remaining proposed changes have been prepared in accordance with the guidance in Reference (a), with the exception of the following two items:

1. Limiting Condition of Operation (LCO) requirements for Valve Position Indication instrumentation, and
2. Implementation date and title for the Shift Technical Advisor position.

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Our basis for proposing different LCO requirements for the safety and relief valve position indicators is two-fold. First, the valve position indicators (thermocouples, acoustic fluid flow monitors) provide no accident mitigation function. A stuck open spring safety valve would evidence itself through numerous indications, including high drywell pressure (with resulting SCRAM), increasing drywell temperature, and rapidly decreasing reactor pressure. The event would appear to be the same as a small steam line break, and since no remote control devices or block valves exist for the safety valves, any plant/operator response would be the same. The value of the valve position indication would be in the area of event reconstruction, which could also be performed by direct inspection following recovery. If a relief valve sticks open, numerous indications would also be present, including torus water temperature and level increases, sudden drop in turbine power or rapidly decreasing reactor pressure. The benefit of knowing which valve(s) may be open is to provide the operator a chance to cycle the remote opening device on that valve in an effort to make the valve reclose. Our experience with stuck open valves in the past has shown this action to be extremely ineffective in closing the valve. No other remote control devices or block valves exist, so operator action with respect to stopping any blowdown is limited. In addition, the determination that a valve is open, and even which valve is open, can be made by direct inspection in the area of the torus.

Second, and of equal concern, the LCO's proposed by Reference (a) are overly restrictive and are not commensurate with the original installation requirements for this instrumentation. The original thermocouples on these valves were not installed as safety-related equipment and were provided without redundancy. The acoustic fluid flow monitors recently installed in response to NUREG-0578 section 2.1.3.a were also not installed with any redundancy and their reliability has yet to be demonstrated.

Therefore, use of the LCO's provided in Reference (a) could cause frequent shutdowns, with resultant plant and fuel thermal cycles, which would be unnecessary based upon the relative need of the instrumentation identified above. We believe the LCO's provided in our submittal are adequate in that they prevent startup without all instrumentation being operable and require shutdown in a reasonable period of time when no instrumentation on any valve is operable.

With respect to the Shift Technical Advisor (STA) requirements, our proposed changes include an implementation date of June 1, 1981, which is in agreement with previous responses to the Lessons Learned recommendations. The interim staffing requirements committed to in these responses will be maintained until that date. In addition, the position/title for the STA function at Dresden and Quad Cities will be Shift Control Room Engineer (SCRE), and this designation has been included in the proposed changes.

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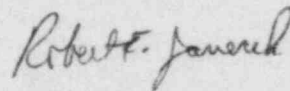
One additional change has been proposed in Table 3.24 for Quad Cities Units 1 and 2 to include a revised reactor water level instrument range resulting from the incorporation of a common instrument zero point (also a Lessors Learned recommendation).

In accordance with the guidance provided in Reference (a), no fee is provided for this submittal per 10 CFR 170.11.

Please address any questions concerning this matter to this office.

Three (3) signed originals and fifty-seven (57) copies of this transmittal are provided for your use.

Very truly yours,




Robert F. Janecek
Nuclear Licensing Administrator
Boiling Water Reactors

Enclosures

cc: RIII Resident Inspector, Dresden
RIII Resident Inspector, Quad Cities

SUBSCRIBED and SWORN to
before me this 18th day
of September, 1980



Notary Public