ATTACHMENT B

PROPOSED CHANGES TO APPENDIX A, TECHNICAL SPECIFICATIONS OF FACILITY OPERATING LICENSES DPR-29 AND DPR-30

DPR-29	DPR-30
6.6-2	6.6-2a

whole body dose received from external sources shall be assigned to specific major work functions.

Monthly Operating Report

Routine reports of operating statistics and shutdown experience shall be submitted on a monthly basis to the Director, Office of Management Information and Program Control, U.S. Nuclear Regulatory Commission, Washington, DC 26555, with a copy to the appropriate Regional Office, to arrive no later than the 15th of each month following the calendar month covered by the report. In addition, any changes to the ODCM shall be submitted with the Monthly Operating Report within 90 days of the effective date of the change.

A report of major change to the radioactive waste treatment systems shall be submitted with the Monthly Operating Report for the period in which the evaluation was reviewed and accepted by the onsite review function. If such change is re-evaluated and not installed, notification of cancellation of the change should be provided to the NRC.

- 4. Core Operating Limits Report
 - a. Core operating limits shall be established and documented in the CORE OPERATING LIMITS REPORT before each reload cycle or any remaining part of a reload cycle for the following:
 - The Rod Withdrawal Block Monitor Upscale Instrumentation Setpoint for Table 3.2-3 of Specification 3.2.C and for Specification 3.6.H.
 - (2) The overall average of the 20% insertion scram time data for Specification 3.3.C.
 - (3) The Average Planar Heat Generation Rate (APLHGR) for Specification 3.5.1.
 - (4) The Linear Heat Generation Rate (LHGR) for Specification 3.5.3.
 - (5) The Minimum Critical Power Ratio (MCPR) for Specification 3.5.K and 3.6.H.
 - (6) The K, core flow MCPR adjustment factor for Specification 3.5.K.

The analytical methods used to determine the core operating limits shall be those previously reviewed and approved by NRC in NEDE-24011-P-A, General Electric Standard Application for Reactor Fuel (latest approved revision).

INSERT A)

b.

Amendment No. 120

INSERT A

- b. The analytical methods used to determine the core operating limits shall be those previously reviewed and approved by the NRC in the latest approved revision or supplement of the topical reports describing the methodology. For Quad Citles Unit 1, the topical reports are:
 - NEDE-24011-P-A, "General Electric Standard Application for Reactor Fuel," (latest approved revision).
 - (2) Commonwealth Edison Topical Report NFSR-0085, "Benchmark of BWR Nuclear Besign Methods," (latest approved revision).
 - (3) Commonwealth Edison Topical Report NFSR-0085, Supplement 1, "Benchmark of BWR Nuclear Design Methods - Quad Cities Gamma Scan Comparisons," (latest approved revision).
 - (4) Commonwealth Edison Topical Report NFSR-0085, Supplement 2, "Benchmark of BWR Nuclear Design Methods - Neutronic Licensing Analyses," (latest approved revision).

- b. The analytical methods used to determine the core operating limits shall be those previously reviewed and approved by the NRC in the latest approved revision or supplement of the topical reports describing the methodology. For Quad Cities Unit 2, the topical reports are:
 - NEDE-24011-P-A, "General Electric Standard Application for Reactor Fuel," (latest approved revision).
 - (2) Commonwealth Edison Topical Report NFSR-0085, "Benchmark of BWR Nuclear Design Methods," (latest opproved revision).
 - (3) Commonwealth Edison Topical Report NFSR-0085, Supplement 1, "Benchmark of BWR Nuclear Design Methods - Quad Cities Gamma Scan Comparisons," (latest approved revision).
 - (4) Commonwealth Edison Topical Report NFSR-0085, Supplement 2, "Benchmark of BWR Nuclear Design Mathods - Neutronic Licensing Analyses," (latest approved revision).
- c. The core operating limits shall be determined so that all applicable limits (e.g., fuel thermal-mechanical limits, core thermal-hydraulic limits, ECCS limits, nuclear limits such as shutdown margin, and transient and accident analysis limits) of the safety analysis are met.
- d. The CORE OPERATING LIMITS REPORT, including any mid-cycle revisions or supplements thereto, shail be provided upon issuance, for each reload cycle, to the NRC Document Control Desk with copies to the Regional Administrator and Sesident Inspector.

ATTACHMENT C

PROPOSED CHANGES TO APPENDIX A, TECHNICAL SPECIFICATIONS OF FACILITY OPERATING LICENSES NPF-11 and NPF-18

<u>NPF-11</u>			NPF-18
6-25			6-25

ADMINISTRATIVE CONTROLS

b.

Semiannual Radioactive Effluent Release Report (Continued)

- The Average Planar Linear Heat Generation Rate (APLHGR) for Technical Specification 3.2.1.
- (2) The minimum Critical Power Ratio (MCPR) (including 20% scram time, tau (τ), dependent MCPR limits, and K, core flow MCPR adjustment factors) for Technical Specification 3.2.3.
- (3) The Linear Heat Generation Rate (LHGR) for Technical Specification 3.2.4.
- (4) The Rod Block Monitor Upscale Instrumentation Setpoints for Technical Specification Table 3.3.6-2.
- The analytical methods used to determine the core operating limits shall be those previously reviewed and approved by NRC in NEDE-24011-P-A, General Electric Standard Application for Reactor Fuel (latest approved revision).
- c. The core operating limits shall be determined so that all applicable limits (e.g., fuel thermal-mechanical limits, core thermal-hydraulic limits, ECCS limits, nuclear limits such as shutdown margin, and transient and accident analysis limits) of the safety analysis are met.
- d. The CORE OPERATING LIMITS REPORT, including any mid-cycle revisions or supplements thereto, shail be provided upon issuance, for each reload cycle, to the U.S. Nuclear Regulatory Commission Document Control Desk with copies to the Regional Administrator and Resident Inspector.

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- b. The analytical methods used to determine the core operating limits shall be those previously reviewed and approved by the NRC in the latest approved revision or supplement of the topical reports describing the methodology. For LaSalie County Station Unit 1, the topical reports are:
 - NEDE-24011-P-A, "General Electric Standard Application for Reactor Fuel," (latest approved revision).
 - (2) Commonwealth Edison Topical Report NFSR-0085, "Benchmark of BWR Nuclear Design Methods," (latest approved revision).
 - (3) Commonwealth Edison Topical Report NFSR-0085, Supplement 1, "Benchmark of BWR Nuclear Design Methods - Quad Cities Gamma Scan Comparisons," (latest approved revision).
 - (4) Commonwealth Edison Topical Report NFSR-0085, Supplement 2, "Benchmark of BWR Nuclear Design Methods - Neutronic Licensing Analyses," (latest approved revision).

ADMINISTRATION CONTROLS

Semiannual Radioactive Effluent Release Report (Continued)

- The Average Planar Linear Heat Generation Rate (APLHGR) for Technical Specification 3.2.1.
- (2) The minimum Critical Power Ratio (MCPR) (including 20% scram time, tau (τ), dependent MCPR limits, and Kf core flow MCPR adjustment factors) for Technical Specification 3.2.3.
- (3) The Linear Heat Generation Rate (LHGR) for Technical Specification 3.2.4.
- (4) The Rod Block Monitor Upscale Instrumentation Setpoints for Technical Specification Table 3.3.6-2.
- b. The analytical methods used to determine the core operating limits shall be those previously reviewed and approved by NRC in NEDE-24011-P-A, General Electric Standard Application for Reactor fuel (latest approved revision).
- c. The core operating limits shall be determine so that all applicable limits (e.g., fuel thermal-mechanical limits, core thermal-hydraulic limits, ECCS Limits, nuclear limits such as shutdown margin, and transient and accident analysis limits) of the safety analysis are met.
- d. The CORE OPERATING LIMITS REPORT, including any mid-cycle revisions or supplements thereto, shall be provided upon issuance, for each reload cycle, to the U.S. Nuclear Regulatory Commission Document Control Desk with copies to the Regional Administrator and Resident Inspector.
- 8. Deleted.

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INSERT A

- b. The analytical methods used to determine the core operating limits shall be those previously reviewed and approved by the NRC in the latest approved revision or supplement of the topical reports describing the methodology. For LaSalle County Station Unit 2, the topical reports are:
 - NEDE-24011-P-A, "General Electric Standard Application for Reactor Fuel," (latest approved revision).
 - (2) Commonwealth Edison Topical Report NFSR-0085, "Benchmark of BWR Nuclear Design Methods," (latest approved revision).
 - (3) Commonwealth Edison Topical Report NFSR-0085, Supplement 1, "Benchmark of BWR Nuclear Design Methods - Quad Cities Gamma Scan Comparisons," (latest approved revision).
 - (4) Commonwealth Edison Topical Report NFSR-0085, Supplement 2, "Benchmark of BWR Nuclear Design Methods - Neutronic Licensing Analyses," (latest approved revision).

ATTACHMENT D

SIGNIFICANT HAZARDS CONSIDERATION

Commonwealth Edison Company proposes an amendment to Facility Operating Licenses DPR-29, DPR-30, NPF-11, and NPF-18 to include the NRC approved CECo Topical Report NFSR-0085 so that CECo can perform neutronic licensing calculations. As discussed in Attachment A, CECo proposes to reference the topical Report in the Technical Specifications of Quad Cities and LaSalle County Stations.

CECo has evaluated the proposed amendment and concluded that it does not involve a significant hazards consideration. According to 10 CFR 50.92(c), a proposed amendment to an operating license involves no significant hazards considerations if operation of the facility in accordance with the proposed amendment would not:

- Involve a significant increase in the probability or consequences of an accident previously evaluated; or
- Create the possibility of a new or different kind of accident from any accident previously evaluated; or
- 3. Involve a significant reduction in a margin of safety.

The proposed amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated because:

The NRC approved methodologies to be referenced in the Technical Specifications are used to evaluate core operating limits and do not introduce physical changes to the plant. The same spectrum of limiting events will continue to be analyzed using NRC approved methods for each reload. This amendment is administrative in nature and does not affect any accident initiators or initial assumptions used in plant accident analyses; therefore, the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

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The proposed changes do not create the possibility of a new or different kind of accident from any accident previously evaluated because:

The referenced NRC approved methodologies will continue to be used to analyze limiting transients, and do not introduce any physical changes to the plant or the operation of the facility as described in the FSAR; therefore, the p used change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

The proposed changes do not involve a significant reduction in margin of safety because:

The referenced NRC approved methodologies will continue to ensure fuel design and licensing criteria are met. The proposed amendment is purely administrative in nature and has no effect on the margin of safety. Guidance has been provided in "Final Procedures and Standards on No Significant Hazards Considerations," Final Rule 51 FR 7744, for the application of standards to license change requests for determination of the existence of significant hazards considerations. This document provides examples of amendments which are and are not considered likely to involve significant hazards considerations. These proposed amendments most closely fit the example of a purely administrative change to the Technical Specification (e.(i) of 51 FR 7751).

The proposed amendments do not involve a significant relaxation of the criteria used to establish safety limits, a significant relaxation of the bases for the limiting safety system settings or a significant relaxation of the bases for the limiting conditions for operations. Therefore, based on the guidance provided in the Federal Register and the criteria established in 10 CFR 50.92(c), the proposed change does not constitute a significant hazards consideration.

ATTACHMENT E

ENVIRONMENTAL ASSESSMENT STATEMENT APPLICABILITY REVIEW

Commonwealth Edison has evaluated the proposed changes against the criteria for the identification of licensing and regulatory actions requiring environmental assessment in accordance with 10 CFR 51.20. It has been determined that the proposed changes meet the criteria for a categorical exclusion as provided under 10 CFR 51.22(c)(9). This conclusion has been determined because the proposed changes do not pose a significant hazards consideration or do not involve a significant increase in the amounts, and no significant changes in the types, of effluents that may be released offsite. This request does not involve a significant increase in individual or cumulative occupational radiation exposure. Therefore, the Environmental Assessment Statement is not applicable for these changes.