ATTACHMENT 3

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PROPOSED CHANGES TO APPENDIX A

TECHNICAL SPECIFICATIONS OF

FACILITY OPERATING LICENSES DPR-29 and DPR-30

QUAD CITIES STATION

DPR-29	DPR-30
3.5/4.5-5	3.5/4.5-4a
3.5/4.5-7	3.5/4.5-6

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4. Containment cooling spray loops are required to be operable when the reactor water temperature is greater than 212°F and prior to reactor startup from a cold condition. Continued reactor operation is permitted provided that a maximum of one drywell spray loop may be inoperable for 30 days when the reactor water temperature is greater than 212°F.

5. If the requirements of 3.5.B cannot be met, an orderly shutdown shall be initiated, and the reactor shall be in a cold shutdown condition within 24 hours.

C. HPCI Subsystem

1. The HPCI subsystem shall be operable whenever the reactor pressure is greater than 150 psig and fuel is in the reactor vessel.

2. During startup following a refuel outage or an outage in which work was performed that directly affects HPCI system operability, if the testing requirements of 4.5.C.3.a cannot be met, continued reactor startup is not permitted. The HPCI subsystem shall be declared inoperable, and the provisions of Specification 3.5.C.4 shall be implemented.

3. Except for the limitations of 3.5.C.2, if the HPCI subsystem is made or found to be inoperable, continued reactor operation is permissible only during the succeeding 14 days unless such subsystem is sooner made operable, provided that during such 14 days the automatic pressure relief subsystems, the core spray subsystems, LPCI mode of the RHR system, and the RCIC system are operable. Otherwise, the provisions of Specification 3.5.C.4 shall be implemented.

4. During each 5-year period, an air test shall be performed on the drywell spray headers and nozzles and a water spray test performed on the torus spray header and nozzles.

C. HPCI Subsystem

Surveillance of HPCI subsystem shall be performed as specified below with the following limitations. For item 4.5.C.3, the plant is allowed 12 hours in which to successfully complete the test once reactor vessel pressure is adequate to perform each test. In addition, the testing required by item 4.5.C.3.a shall be completed prior to exceeding 325 psig reactor vessel pressure. If HPCI is made inoperable to perform overspeed testing, 24 hours is allowed to complete the tests before exceeding 325 psig.

	Item	Frequency
1.	Valve Position	Every 31 days
2.	Flow Rate Test-HPCI Pump shall deliver at least 5000 gpm against a system head corresponding to a reactor vessel pressure of ≥ 1150 psig when steam is being supplied to the turbine at 920 to 1005 psig.	Every 92 days

when the reactor is pressurized above 90 psig with irradiated fuel in the reactor vessel, reactor operation is permissible only during the succeeding 7 days unless repairs are made and provided that during such time the HPCI subsystem is operable.

3. If the requirements of Specification 3.5.D cannot be met, an orderly shutdown shall be initiated and the reactor pressure shall be reduced to 90 psig within 24 hours.

3. A simulated automatic initiation which opens all pilot valves shall be performed each refueling outage.

4. When it is determined that two valves of the automatic pressure relief subsystem are inoperable, the HPCI shall be demonstrated to be operable immediately.

E. Reactor Core Isolation Cooling System

1. The RCIC system will be operable whenever the reactor pressure is greater than 150 psig and fuel is in the reactor vessel.

2. During startup following a refuel outage or an outage in which work was performed that directly affects the RCIC system operability, if the testing requirements of 4.5.E.3.a cannot be met, continued reactor startup is not permitted. The RCIC system shall be declared inoperable, and the provisions of Specification 3.5.E.4 shall be implemented.

3. Except for the limitations of 3.5.E.2, if the RCIC system is made or found to be inoperable, continued reactor operation is permissible only during the succeeding 14 days unless such system is sooner made operable, provided that during such 14 days the HPCI system is operable. Otherwise, the provisions of Specification 3.5.E.4 shall be implemented.

E. Reactor Core Isolation Cooling System

Surveillance of the RCIC system shall be performed as specified below with the following limitations. For item 4.5.E.3, the plant is allowed 12 hours in which to successfully complete the test once reactor vessel pressure is adequate to perform each test. In addition, the testing required by item 4.5.E.3.a shall be completed prior to exceeding 325 psig reactor vessel pressure. If RCIC is made inoperable to perform overspeed testing, 24 hours is allowed to complete the tests before exceeding 325 psig.

	Item	Frequency
1.	Valve Position	Every 31 days
2.	Flow Rate Test - RCIC Pump shall deliver at least 400 gpm against a system head corresponding to a reactor vessel pressure of ≥ 1150 psig when steam is	Every 92 days

C. HPCI Subsystem

1. The HPCI subsystem shall be operable whenever the reactor pressure is greater than 150 psig and fuel is in the reactor vessel.

2. During startup following a refuel outage or an outage in which work was performed that directly affects HPCI system operability, if the testing requirements of 4.5.C.3.a cannot be met, continued reactor startup is not permitted. The HPCI subsystem shall be declared inoperable, and the provisions of Specification 3.5.C.4 shall be implemented.

3. Except for the limitations of 3.5.C.2, if the HPCI subsystem is made or found to be inoperable, continued reactor operation is permissible only during the succeeding 14 days unless such subsystem is sooner made operable, provided that during such 14 days the automatic pressure relief subsystem, the core spray subsystems, LPCI mode of the RHR system, and the RCIC system are operable. Otherwise, the provisions of Specification 3.5.C.4 shall be implemented.

4. If the requirements of Specification 3.5.C.1, 3.5.C.2 or 3.5.C.3 cannot be met, an orderly shutdown shall be initiated, and the reactor pressure shall be reduced to <150 psig within 24 hours.

C. HPCI Subsystem

Surveillance of the HPCI subsystem shall be performed as specified below with the following limitations. For item 4.5.C.3. the plant is allowed 12 hours in which to successfully complete the test once reactor pressure is adequate to perform each test. In addition, the testing required by item 4.5.C.3.a shall be completed prior to exceeding 325 psig reactor vessel pressure. If HPCI is made inoperable to perform overspeed testing, 24 hours is allowed to complete the tests before exceeding 325 psig.

	Item	Frequency
1.	Valve Position	Every 31 days
2.	Flow Rate Test - HPCI pump shall deliver at least 5000 gpm against a system head corresponding to a reactor vessel pressure of ≥1150 psig when steam is being supplied to the turbine at 920 to 1005 psig.	Every 92 days
3.	Flow Rate Test - HPCI pump shall deliver at least 5000 gpm against a system head corresponding to a reactor vessel pressure of: a. ≥ 300 psig when steam is being supplied to the turbine at 250 to 325 psig, and b. ≥ 1150 psig when steam is being supplied to the turbine at 920 to 1005 psig.	During startup following a refuel outage or an outage in which work was performed that directly affects HPCI system operability.
4.	Simulated Automatic Actuation Test	Each refueling outage
5.	Logic System Functional Test	Each refueling outage

E. Reactor Core Isolation Cooling System	E. Reactor Core Isolation Cooling System
	Surveillance of the RCIC system shall be performed as specified below with the following limitations. for item 4.5.E.3. the plant is allowed 12 hours in which to successfully complete the test once reactor vessel pressure is adequate to perform each test. In addition, the testing required by item 4.5.E.3.a shall be completed prior to exceeding 325 psig reactor vessel pressure. If RCIC is made inoperable to perform overspeed testing, 24 hours is allowed to complete the tests before exceeding 325 psig.

		Item	Frequency
1.	The RCIC system will be operable whenever the reactor pressure is greater than 150 psig and fuel is in the reactor vessel.	1. Valve Position	Every 31 days
2.	During startup following a refuel outage or an outage in which work was performed that directly affects RCIC system operability, if the testing requirements of 4.5.E.3.a cannot be met, continued reactor startup is not permitted. The RCIC system shall be declared inoperable, and the provisions of Specification 3.5.E.4 shall be implemented.	2. Flow Rate Test - RCIC pump shall deliver at least 400 gpm against a system head corresponding to a reactor vessel pressure of ≥1150 psig when steam is being supplied to the turbine at 920 to 1005 psig.	Every 92 days
3.	Except for the limitations of 3.5.E.2, if the RCIC system is made or found to be inoperable, continued reactor operation is permitted only during the succeeding 14 days unless such system is sooner made operable, provided that during such 14 days the HPCI system is operable. Otherwise, the provisions of Specification 3.5.E.4 shall be implemented.	3. Flow Rate Test - RCIC pump shall deliver at least 400 gpm against a system head corresponding to a reactor vessel pressure of: a. ≥ 300 psig when steam is being supplied to the turbine at 250 to 325 psig, and b. ≥ 1150 psig when steam is being supplied to the turbine at 920 to 1005 psig.	During startup following a refuel outage or an outage in which work was performed that directly affects RCIC system operability.
4.	If the requirements of Specification 3.5.E.1, 3.5.E.2 or 3.5.E.3 cannot be met, an orderly shutdown shall be initiated and the reactor pressure shall be reduced to <150 psig within 24 hours.	4. Simulated Automatic Actuation Test	Each refueling outage
		5. Logic System Functional Test	Each refueling outage

ATTACHMENT 4

EVALUATION OF SIGNIFICANT HAZARDS CONSIDERATION FOR

PROPOSED AMENDMENT

The proposed changes outlined in this amendment request would change the action provisions of Technical Specification (TS) 3.5.C.2 for the High Pressure Coolant Injection (HPCI) system and 3.5.E.2 for the Reactor Core Isolation Cooling (RCIC) system to reduce the likelihood of unnecessary plant transients and challenges to safety systems caused by forced shutdowns related to an unanticipated flow-performance testing failure while at normal operating reactor pressure. The proposed amendment would change the action provisions of Surveillance Specifications 4.5.C.3.a and b for HPCI and 4.5.E.a and b for RCIC to a limited action provision applicable to the failure to demonstrate the required low reactor pressure testing of Surveillance Specifications 4.5.C.3.a and 4.5.E.3 a only. Failure to meet the requirements of Surveillance Specification 4.5.C.3.b and 4.5.E.3.b (flow rate testing of a HPCI or RCIC system at normal operating pressure) would fall under the jurisdiction of current Action Specification(s) 3.5.C.3 and 3.5.E.3, which provides a 14 day allowable outage time with compensatory measures in place. These changes have been reviewed by CECo, and we believe that they do not present a significant hazards consideration. The basis for our determination is documented as follows:

BASIS FOR NO SIGNIFICANT HAZARDS CONSIDERATION

CECo has evaluated this proposed amendment and determined that it involves no significant hazards consideration. In accordance with the criteria of 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:

1. Involve a significant increase in the probability or consequences of an accident previously evaluated because:

   ITEM A

   The proposed change would limit the action provisions of TS 3.5.C.2 to require entry into the Action Specification of TS 3.5.C.4 (24 hour shutdown and pressure reduction) only upon failure to meet the low reactor pressure flow rate testing provisions of TS 4.5.C.3.a for the HPCI system and not upon failure to meet the normal operating pressure flow rate test of TS 4.5.C.3.b. No accident initiator or precursors are changed by the proposed change, and by reducing the likelihood of plant transients and challenges to safety systems, the realistic probability of a Reactor Coolant Pressure Boundary failure accident as previously evaluated is not altered as a result of the proposed change to TS 3.5.C.2. Therefore, the proposed change would in no way significantly increase the probability of an accident previously evaluated.

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The unavailability of the HPCI system during a design basis accident is within the design assumptions for ECCS component operation. The proposed change to TS 3.5.C.2 would not change or alter the design assumptions used in the limiting basis LOCA concurrent with the worst single failure. In the accident analysis, the HPCI single failure is bounded by the battery failure case which assumes two failures (i.e., battery and HPCI). The recirculation suction line break with battery failure is the limiting DBA break/failure combination satisfying the requirements of 10 CFR 50, Appendix K. The proposed change to TS 3.5.C.2 does not change the compensatory action provisions of current TS 3.5.C.3, which include that RCIC remain operable to perform a similar function; nor will the proposed amendment extend the Allowable Outage Time be extended beyond the 14 days as previously approved. Therefore, the proposed amendment to change TS 3.5.C.2 would not significantly affect the consequences of an accident previously evaluated.

ITEM B

The proposed change to TS 3.5.E.2 would in the same way reduce the likelihood of plant transients and challenges to safety systems and therefore in no way alters the accident initiators or precursors that could result in a Reactor Coolant Pressure Boundary failure accident as previously evaluated. A unit shutdown and reduction in pressure to < 150 psig would still be imposed should the low reactor pressure test of TS 4.5.E.3.a fail. The current remedial actions of TS 3.5.E.3 would apply should RCIC fail to meet the required flow rate at normal operating pressure. Therefore, deleting the requirement that would lead to unnecessary cycling would in no way significantly increase the probability of an accident previously evaluated.

RCIC system ability to provide makeup coolant to the reactor pressure vessel during an isolation accompanied by a loss of feedwater is used to evaluate plant response to transient events. However, the RCIC system is not an Emergency Core Cooling system and no credit is taken in the safety analysis for RCIC operation. Therefore, the proposed change to limit the action provision of TS 3.5.E.2 concurrent with the compensatory action of current TS 3.5.E.3, which requires that HPCI be operable to perform a similar function, cannot significantly affect the consequences of an accident previously evaluated.

2. Create the possibility of a new or different kind of accident from any previously evaluated because:

ITEM A

The proposed change to TS 3.5.C.2 does not change the design intent of the HPCI system nor are any physical plant changes proposed by the amendment request. ECCS performance without the availability of HPCI as a postulated failure has been previously evaluated and found to be acceptable. No new or different modes of operation, other than those already evaluated, are introduced by the proposed change to TS 3.5.C.2, therefore, there is no possibility of a new or different kind of accident from any previously evaluated.

ITEM B

The proposed change to TS 3.5.E.2 for the RCIC system does not result in any physical plant changes, nor does the proposed change to TS 3.5.E.2 involve any new or different operating modes of operation, therefore, there is no possibility of a new or different kind of accident from any previously evaluated.

3. Involve a significant reduction in the margin of safety because:

ITEM A

The proposed change to TS 3.5.C.2 makes no change to the accident or transient analysis of the plant. Plant operations and safety are improved by not imposing unnecessary shutdowns and challenges to plant safety systems. The current compensatory measures of TS 3.5.C.3 are not changed by the proposed amendment; nor is any established safety limit, operating limit or design assumption affected by the proposed amendment. Therefore, the proposed change does not involve a reduction in a margin of safety.

ITEM B

The proposed change to TS 3.5.E.2 makes no change to the accident or transient analysis of the plant nor are plant operations made less conservative. Plant operations and safety are improved by not imposing unnecessary shutdowns and challenges to plant safety systems. The compensatory measure which requires that HPCI remain operable will not be changed nor will the Allowable Outage Time be extended beyond the previously approved 14 days. No established safety limit, operating limit or design assumption is altered by the proposed amendment. Therefore, the proposed change does not involve a reduction in a margin of safety.

ATTACHMENT 5

ENVIRONMENTAL ASSESSMENT FOR PROPOSED AMENDMENT

The proposed changes to the QCNPS Technical Specifications (TS) involve the change to the Action provisions of Technical Specification (TS) 3.5.C.2 for the High Pressure Coolant Injection (HPCI) system and 3.5.E.2 for the Reactor Core Isolation Cooling (RCIC) system to reduce the likelihood of unnecessary plant transients and challenges to safety systems caused by forced shutdowns and unnecessary reactor cycling related to an unanticipated flow-performance testing failure. The proposed change is consistent with Standard Technical Specifications in permitting reactor startup to continue upon successful completion of the low pressure flow rate test while allowing compensatory measures to permit a 14 day allowable outage time of a single high pressure injection system, once normal operating reactor pressure is achieved.

Commonwealth Edison has evaluated the proposed amendment in accordance with the requirements of 10 CFR 51.21 and has determined that the amendment meets the requirements for categorical exclusion as specified by 10 CFR 51.22(c)(9).

The proposed amendment to TS 3.5.C.2 for the HPCI system does not change the types of effluents or increase the amount of effluents that may be released offsite. The proposed change to TS 3.5.C.2 would not change or alter the design assumptions used in the limited basis LOCA, concurrent with the worst single failure. Therefore, the proposed amendment to change TS 3.5.C.2 would not significantly affect the consequences (including the types or amounts of effluents released offsite) of an accident previously evaluated.

The proposed change to TS 3.5.E.2 for the RCIC system does not change the types of effluents or increase the amount of effluents that may be released offsite. The RCIC system is not considered an Emergency Core Cooling System (ECCS) and no credit is taken for RCIC operation in the safety analysis. Therefore the proposed amendment, concurrent with the compensatory action requiring that the HPCI system be operable to perform a similar function, would not significantly impact the consequence (including the types or amounts of effluents released offsite) of an accident previously evaluated.

The proposed changes do not significantly affect individual and cumulative occupational radiation exposures. The revised action statements would allow continued operation upon the successful completion of a low pressure flow performance test followed by the failure of a normal operating pressure flow permance test. Individual and cumulative occupational radiation exposures would not be significantly affected since the radiation levels in the areas surrounding the HPCI and RCIC systems are independent of the operational status of the reactor.

In conclusion, the proposed amendment will not result in any increase in environmental consequences beyond those already accepted by the NRC in the Final Environmental Statement.

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