



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

September 26, 1984

Mr. Harold R. Denton, Director
 Office of Nuclear Reactor Regulation
 U.S. Nuclear Regulatory Commission
 Washington, DC 20555

Subject: Quad Cities Station Units 1 and 2
 Proposed Technical Specification
 Change to Incorporate New Equipment
 Installed in Response to Generic Letter 83-36
 NRC Docket Nos. 50-254/265

References (a): D. G. Eisenhut letter to All Boiling
 Water Reactor Licenses dated November 1,
 1983

(b): P. L. Barnes letter to H. R. Denton
 dated February 9, 1984

Dear Mr. Denton:

Pursuant to 10 CFR 50.59 Commonwealth Edison proposes technical specification changes for Quad Cities Units 1 and 2 to address the concerns contained in Generic Letter 83-36 and NUREG 0737. The enclosed technical specification pages comprise our final response to the following items:

<u>NUREG-0737 Item</u>	<u>Item Description</u>
II.B.1.	Reactor Coolant System Vents
II.B.3.	Post-Accident Sampling
II.F.1.1.	Noble Gas Effluent Monitors
II.F.1.2.	Iodine & Particulate Monitors
II.F.1.3.	Containment Rad. Monitors
II.F.1.4.	Containment Pressure Monitors
II.F.1.5.	Containment Water Level Mon.
II.F.1.6.	Containment Hydroger. Monitors
III.D.3.4.	Control Room Habitability

8410020419 840926
 PDR ADDCK 05000254
 P PDR

A046 w/check \$150.00 #9017060

Please note that some of the proposed revisions update pages included in the RETS amendment which becomes effective December 19, 1984. These pages are noted in Attachments 1 and 2.

Item II.B.1 Reactor Coolant System Vents

No Technical Specification change is proposed because Quad Cities does not have isolation condensers.

Item II.B.3 Post Accident Sampling

Section L, which covers the Post Accident Sampling Program, has been added to page 6 of the Operating License.

Item II.F.1. - Noble Gas Monitor (SPING)

Appropriate action statements and surveillance requirements are added to Tables 3.2-6 and 4.2.4 for the accident-range noble gas monitor in the main chimney effluent pathway.

Item II.F.1.2 - Iodine and Particulate Monitor (Victoreen)

Section L of the License pages is added to include the ability to sample for iodine and particulates in the main chimney effluent pathway.

Item II.F.1.3 - Containment Radiation Monitors

The monitors are proposed to be included in the post-accident monitoring instrumentation tables 3.2-4 and 4.2-2 in the Technical Specifications operability and surveillance requirements are provided, in accordance with the staff guidance provided in the Generic Letter.

Item II.F.1.4 Containment Pressure Monitors

These monitors are proposed to be included in the post-accident monitoring instrumentation tables 3.2-4 and 4.2-2 in the Technical Specifications. The 0-250 psig indicators are integrated into the operability requirements and surveillance test frequencies given for the pre-existing pressure instruments.

Item II.F.1.5 Containment Water Level Monitor

New wide range monitors are proposed to be included in the post-accident monitoring instrumentation Tables 3.2-4 and 4.2-2 in the Tech Specs. The 0-30-ft. indicators are integrated into the existing Tech Spec operability requirements in a fashion so as to provide for the operability of both narrow and wide range torus level instruments. Appropriate surveillance requirements are also provided.

In conjunction with the wide range level monitors, a new narrow range torus water level instrument, X-1602-7, which will give a more accurate indication of normal water level, replaces the previous narrow range instrument.

Item II.F.1.6 Containment Hydrogen Monitors

Two drywell hydrogen concentration monitors are added along with associated operating and surveillance requirements.

Note 8 is added to Table 3.2-4 to specify LCO's. Credit is allowed for the HRSS hydrogen monitoring capability for a short period of time only. This is in lieu of Model Tech Spec Table 3.3.7.5-1 Action 82a contained in Generic Letter 83-36. Our proposed Tech Spec includes words similar to Action 82b for loss of all H₂ monitors.

Surveillance requirements are added to Table 4.2-2. These requirements are similar to those Model Tech Spec Table 4.3.7.5-1 contained in Generic Letter 83-36.

Item III.D.3.4 - Control Room Habitability (Control Room HVAC AFU and Toxic Gas Monitors)

Section 3.2.F has been revised to add the Toxic Gas monitors and their setpoints. Section 4.2.F.2 is added to test the manual isolation function every refueling outage. RETS pages 3.2/4.2-4 and 3.2./4.2-5 are changed to delete an obsolete reference to Tech Spec section 6.6.B.2. Bases provided on page 3.2/4.2-8 Table 4.2-1 are amended to provide surveillance requirements for the Toxic Gas monitors. The recommended LCO statements differ from those in the Model Tech Specs provided with Generic Letter 83-36. This is because we have only one monitor for each toxic gas, and the new AFU does not have an isolation mode. The surveillance statements for our monitors track those in the Model Tech Specs, except that a daily instrument check is deemed sufficient.

Sections 3.8.H. and 4.8.H. are added to provide LCO and surveillance requirements for the new Control Room HVAC Air Filtration Unit. These new specifications were written based on the existing requirements for the SBGTS. We have proposed reasonable

LCO's for the one AFU that exists. The recommended surveillance requirements track the Model Tech Specs except for the following:

1. Since the control room is occupied, verifying control room temperature once per 12 hours or during any interval is not required.
2. The AFU does not have isolation or pressurization mode automatic functions.
3. No run-time-based charcoal filter testing is needed, since the 18-month removal will cover and test this item satisfactorily.

Miscellaneous Revision

Changes are made to pages 3.2/4.2-15b and 3.2/4.2-17 to delete the Spray Canal Blowdown Flow Monitor because the spray canal is no longer used.

The proposed changes have received On-site and Off-site review and approval. We have reviewed these amendment requests and find that no significant hazard consideration exists. Our review is documented in Attachment 3.

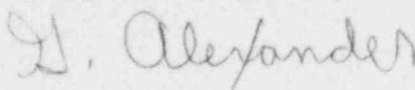
Pursuant to 10 CFR 170, a fee remittance of \$150.00 has been enclosed.

Commonwealth Edison is notifying the State of Illinois of our request for these amendments by transmittal of a copy of this letter and its attachments to the designated State Official.

Please address any questions you may have concerning this matter to this office.

Three (3) signed originals and thirty-seven (37) copies of this transmittal are provided for your use.

Very truly yours,

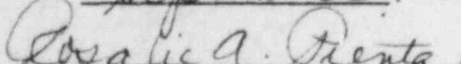


G. Alexander
Nuclear Licensing Administrator

Attachments

cc: R. Bevan - NRR
RIII Inspectors - QC
G. N. Wright (Illinois)

SUBSCRIBED and SWORN to
before me this 28th day
of September, 1984


Notary Public

ATTACHMENT 1

LIST OF TECHNICAL SPECIFICATION PAGES AFFECTED
FACILITY OPERATION LICENSE DPR-29
DOCKET NO. 50-254

PAGES

Operating License Page 6

ii

3.2/4.2-3	*
3.2/4.2-4	*
3.2/4.2-5	*
3.2/4.2-8	*
3.2/4.2-15	
3.2/4.2-15a	
3.2/4.2-15aa	**
3.2/4.2-15b	*
3.2/4.2-15c	*
3.2/4.2-15d	*
3.2/4.2-17	*
3.2/4.2-18	
3.2/4.2-18a	
3.2/4.2-19	*
3.2/4.2-20	*
3.8/4.8-14a	**
3.8/4.8-14b	**
3.8/4.8-19	*

* Page being amended is Amendment 89 version - RETS

** New page

ATTACHMENT 2

LIST OF TECHNICAL SPECIFICATION PAGES AFFECTED
FACILITY OPERATION LICENSE DPR-30
DOCKET NO. 50-265

PAGES

Operating License Page 6

ii

3.2/4.2-3	*
3.2/4.2-4	*
3.2/4.2-5	*
3.2/4.2-8	*
3.2/4.2-15	
3.2/4.2-15a	
3.2/4.2-15aa	**
3.2/4.2-15b	*
3.2/4.2-15c	*
3.2/4.2-15d	*
3.2/4.2-17	*
3.2/4.2-18	
3.2/4.2-18a	
3.2/4.2-19	*
3.2/4.2-20	*
3.8/4.8-14a	**
3.8/4.8-14b	**
3.8/4.8-19	*

* Page being amended is Amendment 89 version - RETS

** New page

ATTACHMENT 3
SIGNIFICANT HAZARDS CONSIDERATION

Basis For Proposed No Significant Hazards Consideration Determination

The Commission has provided guidance concerning the application of the standards for determining whether a significant hazards consideration exists by providing certain examples (48 FR 14870). The examples of actions involving no significant hazards consideration include: "(ii) A change that constitutes an additional limitation restriction, or control not presently included in the technical specifications; for example, a more stringent surveillance requirement". The changes proposed in the application for amendment are encompassed by this example in that the proposed change would add Limiting Conditions for Operation and surveillance requirements on the new instrumentation installed in response to Generic Letter 83-36 and is thus similar to the example above.

Therefore, since the application for amendment involves a proposed change that is similar to an example for which no significant hazards consideration exists, Commonwealth Edison has made a proposed determination that the application involves no significant hazards consideration.