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January 3, 1985

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

Subject: Quad Cities Station Unit 2
Proposed Amendment to Technical Specification for Operating License DPR-30 Scram Discharge Volume System Modifications and Calibration/ Functional Test Frequency for Analog Trip Units
NRC Docket No. 50-265

References (a): V. Stello, Jr. letter to Cordell Reed dated October 2, 1980.

(b): D. B. Vassallo letter to D. L. Farrar dated June 24, 1983 (Confirmatory Order - BWR Scram Discharge System).

(c): G. E. Licensing Topical Report NEDO-21617-A dated December, 1978.

(d): R. B. Bevan letter to D. L. Farrar dated August 2, 1984.

Dear Mr. Denton:

Pursuant to 10 CFR 50.59, Commonwealth Edison proposes to amend Appendix A, Technical Specification (TS), to Operating License DPR-30 for Quad Cities Unit 2. This proposed change is necessitated by modifications to the Scram Discharge Volume (SDV) and replacement of some existing instrumentation with new analog trip systems all to be done on Unit 2 during the upcoming March, 1985 outage.

A Generic Safety Evaluation for the modification of the scram discharge system, issued December 10, 1980, endorsed the criteria set forth by the BWR Owners Subgroup to meet the concerns arising from the Browns Ferry incomplete scram event of July, 1980. By Reference (b), a Confirmatory Order acknowledging Commonwealth Edison's commitment to modify its SDV system in response to those concerns was issued. The same letter also forwarded model Technical Specifications to us

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as guidance for revising the TS for operation with the proposed modification of the SDV system. We feel that the TS changes proposed in this submittal for the SDV are fully responsive to the concerns addressed in the Generic Safety Evaluation on SDV systems and are keeping with the general guidance provided in the model Technical Specifications.

During the upcoming Unit 2 outage certain equipment also will be replaced to fully comply with 10 CFR Part 50.49 (Environmental Qualification of Electrical Equipment). The following instrumentation will be modified into analog trip systems:

Reactor Low Water Level Instrument	2-263-57A and B
Reactor Low Water Level Instrument	2-263-58A and B
Reactor Water Level Instrument	2-263-73A and B
HPCI High Steam Flow Instrument	2-2389A through D
HPCI Steam Line Low Pressure Instrument	2-2352 and 2-2353

The analog trip system consists of an analog sensor (transmitter) and a master/slave trip unit setup which ultimately drives a trip relay. The frequency of calibration and functional testing for instrument loops of the new analog trip system is based on the recommendations in Licensing Topical Report NEDO-21617-A (December, 1978). As established in NEDO-21617-A, each unit is subjected to a calibration/functional test of one month and the proper calibration/surveillance test interval for the transmitter is once per operating cycle. The only material change to the Technical Specifications that exists with this amendment is that the channel calibration will be performed at the transmitter once per operating cycle. This calibration frequency has been found acceptable by the NRC and approved for use at a sister unit, Quad Cities Unit 1, per Reference (d).

A summary of the proposed changes is enclosed in Attachment 1. The changes themselves can be found in Attachment 2 and have received both Onsite and Offsite review and approval. We have reviewed this amendment request and find that no significant hazards consideration exists. Our review is documented in Attachment 3. Commonwealth Edison is notifying the State of Illinois of our request of this amendment by transmittal of a copy of this letter and its attachments to the designated State Official.

In accordance with 10 CFR 170, a fee remittance of $150.00 is enclosed. This change will be required at the time of Unit 2's startup from the upcoming refueling outage. The expected startup is currently scheduled for June, 1985.

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

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

Very truly yours,

B. Rybak
Nuclear Licensing Administrator

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Attachments (1): Summary of Proposed Changes
(2): Technical Specification Change to DPR-30
(3): Evaluation of Significant Hazards Consideration

cc: Region III Inspector - Quad Cities
R. Bevan - NRR

SUBSCRIBED and SWORN to
before me this 3rd day
of January, 1985

Rosalie A Prenta
Notary Public

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ATTACHMENT 1

Summary of Proposed Changes

The enclosed proposed changes to the Quad Cities TEchnical Specifications (DPR-30) are necessitated by significant modifications to the Scram Discharge Volume (SDV) system and installation of an analog trip system during the upcoming outage. Then changes are discussed below page by page:

1. page 3.1/4.1-2 deletes paragraph which described the old SDV system.

2. page 3.1./4.1-2a, describes the addition of a second instrument volume and the diversity of level sensing methods employed.

3. page 3.1/4.1-3, merely deletes a paragraph which is now included on page 3.1/4.1-2a.

4. page 3.1/4.1-6, describes the analog trip system as used for reactor low water instruments 2-263-57A, 2-263-57B, 2-263-58A and 2-263-58B and the basis for its calibration and functional testing frequency.

5. page 3.1/4.1-7, describes the basis for no calibration frequency for the instrument channel of the thermal switches and added the basis for the analog trip system calibration/functional test frequency - NEDO-21617-A.

6. pages 3.1/4.1-8 thru 3.1./4.1.-10 lists the number of trip channels per bank and the new trip setting in gallons.

7. pages 3.1/4.1-12 & 13, describe calibration of the thermal and dp switches on the SDVs and the functional test frequency change on the reactor low water instrumentation is defined footnote 8.

8. page 3.1/4.1-14, added the dp switch calibration on the SDV and revise the calibration frequency on the reactor low water level analog instrumentation per Note 7.

9. page 3.2/4.2-10, added a discussion on the analog trip system for the reactor low water level instrumentation.

10. page 3.2/4.2 10a, added this new page to accept "spill-over" from previous page due to the insertion of analog trip system description.

11. page 3.2/4.2-14, revised the trip setting on the SDV to a new per bank value.

12. 3.2/4.2-14a, a new page relocating most of the footnotes for Table 3.2-3.

13. page 3.2/4.2-16,17 & 17a - changed the functional and test frequency to reflect the installation of an analog trip system for certain instrumentation per footnote 10.

14. page 3.3/4.3-3, listed the closure times for the SDV vent & drain valves. Also a revision requiring cycling of these same values once per 92 days is included.