ATTACHMENT B

AFFECTED TECHNICAL SPECIFICATION PAGES

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LIMITING CONDITIONS FOR OPERATION AND SURVEILLANCE REQUIREMENTS

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3.6 - LIMITING CONDITIONS FOR OPERATION

K. | Pressure/Temperature Limits

The reactor coolant system temperature and pressure shall be limited in accordance with the limit lines shown on Figure 3.6.K-1 (1) curve A for hydrostatic or leak testing; (2) curve B for heatup by non-nuclear means, cooldown following a nuclear shutdown and low power PHYSICS TESTS; and (3) curve C for operations with a critical core other than low power PHYSICS TESTS, with:

- A maximum reactor coolant heatup of 100°F in any one hour period,
- A maximum reactor coolant cooldown of 100°F in any one hour period,
- A maximum reactor coolant temperature change of ≤20°F in any one hour period during inservice hydrostatic and leak testing operations above the heatup and cooldown limit curves, and
- The reactor vessel flange and head flange temperature ≥100°F when reactor vessel head bolting studs are under tension.

APPLICABILITY:

At all times.

4.6 - SURVEILLANCE REQUIREMENTS

K. Pressure/Temperature Limits

- During system heatup, cooldown and inservice leak and hydrostatic testing operations, the reactor coolant system temperature and pressure shall be determined to be within the required heatup and cooldown limits and to the right of the limit lines of Figure 3.6.K-1 curves A, or B, as applicable, at least once per 30 minutes.
- The reactor coolant system temperature and pressure shall be determined to be to the right of the criticality limit line of Figure 3.6.K-1 curve C within 15 n inutes prior to the withdrawal of control rods to bring the reactor to criticality and at least once per 30 minutes during system heatup.
- 3. The reactor vessel material surveillance specimens shall be removed and examined, to determine changes in reactor pressure vessel material properties in accordance with 10CFR Part 50, Appendix H.
- The reactor vessel flange and head flange temperature shall be verified to be ≥100°F:
 - In OPERATIONAL MODE 4 when the reactor coolant temperature is:
 - ≤130°F, at least once per 12 hours.
 - ≤110°F, at least once per 30 minutes.
 - b. Within 30 minutes prior to and at least once per 30 minutes during tensioning of the reactor vessel head bolting studs.

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To

Insert A

K. Pressure/Temperature Limits

The primary system coolant system temperature and reactor vessel metal temperature and pressure shall be limited as specified below:

- 1. Pressure Testing:
 - a. The reactor vessel metal temperature and pressure shall be maintained within the Acceptable Regions as shown on Figures 3.6.K-1 through 3.6.K-3 with the rate of change of the primary system coolant temperature ≤ 20°F per hour, or
 - b. The rate of change of the primary system coolant temperature shall be ≤100°F per hour when reactor vessel metal temperature and pressure is maintained within the Acceptable Regions as shown on Figure 3.6.K-4.
- Non-Nuclear Heatup and Cooldown and low power PHYSICS TESTS:
 - The reactor vessel metal temperature and pressure shall be maintained within the Acceptable Regions as shown on Figure 3.6.K-4, and
 - b. The rate of change of the primary system coolant temperature shall be ≤100°F per hour.

- K. Pressure/Temperature Limits
 - During non-nuclear heatup or cooldown, and pressure testing operations, at least once per 30 minutes,
 - The rate of change of the primary system coolant temperature shall be determined to be within the heatup and cooldown rate limits, and
 - b. The reactor vessel metal temperature and pressure shall be determined to be within the Acceptable Regions on Figures 3.6.K-1 through 3.6.K-4.
 - For reactor critical operation, determine within 15 minutes prior to the withdrawal of control rods and at least once per 30 minutes during primary system heatup or cooldown,
 - a. The rate of change of the primary system coolant temperature to be within the limits, and
 - b. The reactor vessel metal temperature and pressure to be within the Acceptable Region on Figure 3.6.K-5.
 - The reactor vessel material surveillance specimens shall be removed and examined, to determine changes in reactor pressure vessel material properties in accordance with 10CFR Part 50, Appendix H.

INSERT A (CONT)

- 3. Nuclear Heatup and Cooldown:
 - The reactor vessel metal temperature and pressure shall be maintained within the Acceptable Region as shown on Figure 3.6.K-5, and
 - b. The rate of change of the primary system coolant temperature shall be ≤100°F per hour.
- The reactor vessel flange and head flange temperature ≥83 °F when reactor vessel head bolting studs are under tension.

APPLICABILITY:

At all times.

- The reactor vessel flange and head flange temperature shall be verified to be ≥83°F:
 - a. In OPERATIONAL MODE 4 when the reactor coolant temperature is:
 - ≤113°F, at least once per 12 hours.
 - ≤93°F, at least once per 30 minutes.
 - Within 30 minutes prior to and at least once per 30 minutes during tensioning of the reactor vessel head bolting studs.

3.6 - LIMITING CONDITIONS FOR OPERATION

4.6 - SURVEILLANCE REQUIREMENTS

ACTION:

With any of the above limits exceeded,

- Restore the temperature and/or pressure to within the limits within 30 minutes, and
- 2. Perform an engineering evaluation to determine the effects of the out-of-limit condition on the structural integrity of the reactor coolant system and determine that the reactor coolant system remains acceptable for continued operations or

within 72 hours,

 Be in at least HOT SHUTDOWN within 12 hours and in COLD SHUTDOWN within the following 24 hours.

 Restore the reactor vessel metal temperature and/or pressure to within the limits within 30 minutes without exceeding the applicable primary system coolant temperature rate of change limit, and



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shutdown, the rates of temperature and pressure changes are limited so that the maximum specified heatup and cooldown rates are consistent with the design assumptions and satisfy the stress limits for cyclic operation.

During heatup, the thermal gradients in the reactor vessel wall produce thermal stresses which very from compressive at the inner wall to tensile at the outer wall. These thermal induced compressive stresses tend to alleviate the tensile stresses induced by the internal pressure. Therefore, a pressure temperature curve based on steady state conditions, i.e., no thermal stresses, represents a lower bound of all similar curves for finite heatup rates when the inner wall of the vessel is treated as the governing location.

The heatup analysis also covers the determination of pressure-temperature limitations for the case in which the outer wall of the vessel becomes the controlling location. The thermal gradients established during heatup produce tensile stresses which are already present. The thermal induced stresses at the outer wall of the vessel are tensile and are dependent on both the rate of heatup and the time along the heatup ramp; therefore, a lower bound curve similar to that described for the heatup of the inner wall cannot be defined. Subsequently, for the cases in which the outer wall of the vessel becomes the stress controlling location, each heatup rate of interest must be analyzed on an individual basis.

Figures 3.6 K-1 through 3.6.K-3,	gure 3.6.K-1, for operating conditions; Inservice
And Aludenctation Testing Leurve Att Non-Nuclear Heat	tup/Cooldown feurve B) and Core Critical
BUTE Operation (ourse C) The curves have been esta	ablished to be in conformance with Appendix G to
Operation red Populatory Guide 1 99 Rev	ision 2, and take into account the change in
10 CFR Part 50 and Regulatory Guide 1.00 Hor) as a result of neutron embrittlement. The
reference nil-ductility transition temperature (n	iting vessel material is used to account for
adjusted reference temperature (ART) of the lim	Itilig vessel material is dood to any
irradiation effects.	(Figure 3.6. K-4) Eand the best on head
Figure 3.6.K-5	
Three)vessel regions are considered for the devi	elopment of the pressure-temperature curves.
the core beltline region; 2) the non-beltline region	on (other than the closure flange region), and of the
closure flange region. The beltline region is def	ined as that region of the reactor vessel that
directly surrounds the effective height of the re-	actor core and is subject to an RT _{NDT} adjustment to
account for radiation embrittlement. The non-b	eltline and closure flange region preceive (3)
insufficient fluence to necessitate an RTust adju	stment. These regions contain components which
Insufficient indence to necessitate chosure flan	ges, top and bottom head plates, control rod drive
include; the reactor vessel hozzles, closed of the	ly surround the reactor core. Although the closure
penetrations, and shell plates that do not direct	d separately for the development of the pressure-
flange region is non-beitine region wishread	Appandix & requirements
temperature curves to address TUCFN Part our	y are (and bottom head
122 (got)	and the reactor vessel it is necessary that the
In evaluating the adequacy of the steel which c	omprises the reactor vessel, it is neutrophin
following be established: 1) the RT _{NDT} for all ve	ssel and adjoining materials; 2) the relationship
between RT _{NOT} and integrated neutron flux filur	snce, at energies greater than one weyl; and 3) the
fluence at the location of a postulated flaw.	
1 marshall and the second second	
Sand 4) the bottom head region?	1
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23 °F

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Insert B

The initial RT_{NDT} of the main closure flanges, the shell and hea interials connecting to these flanges, and connecting welds is 10°F; however, the vertical electrosiag welds which terminate immediately below the vessei flange have an RT_{NDT} of 40°F. Therefore, the minimum allowable boltup temperature is established as 100°F (RT_{NDT} + 60°F) which includes a 60°F conservatism required by the original ASME Code of construction.

83°F

Curve A - Hydrotesting

Boltup Temperature

limiting

As indicated in curve A of Figure 3.6.K-1 for system hydrotesting, the minimum metal temperature of the reactor vessel shell is 100°F for reactor pressures less than 312 psig. This 100°F minimum boltup temperature is based on a RT_{NDT} of 40°F for the electroslap weld immediately below the vessel flange and a 60°F conservatism required by the original ASME Code of construction. At reactor pressures greater than 312 psig, the minimum vessel metal temperature is established as 130°F. The 130°F minimum temperature is based on a closure flange region RT_{NDT} of 40°F and a 90°F conservatism required by 10CFR Part 50 Appendix G for pressure in excess of 20% of the preservice hydrostatic test pressure (1563 psig). At approximately 650 psig the effects of pressurization are more limiting than the boltup stresses at the closure flange region, hence a family of non-linear curves intersect the 130°F vertical line. Beltline as well as non-beltline curves have been provided to allow separate monitoring of the two regions. Beltline curves as a function of vessel exposure for 12, 14 and 16 effective full power years (EFPY) are presented to allow the use of the appropriate curve up to 16 EFPY of operation.

A typical sequence involved in pressure testing is a heatup to the required temperature and then pressurization to the required pressure for the inspection. During the heatup, at 100°F/hour or less, Curve B is the governing curve. Since the vessel is not pressurized during the heatup. Curves A and B are the same. When temperatures are stabilized to within 20°F/hour rates, at temperatures above those required by curve A, pressurization begins, at which point Curve A is the governing curve. During the inspection period with the vessel at the required pressure, temperature changes are limited to 20°F/hour.

Curve B. Non-Nuclear Heatup/Cooldown

Figure 3.6. K-4

Curve B of Figure 3.6.K (applies during heatups with non-nuclear heat (e.g., recirculation pump heat) and during cooldowns when the reactor is not critical (e.g., following a scram). The curve provides the minimum reactor vessel metal temperatures based on the most limiting vessel stress. As indicated by the vertical 100°F line, the boltup stresses at the closure flange region are most limiting for reactor pressures below approximately 110 psig. For reactor pressures greater than approximately 110 psig, pressurization and thermal stresses become more limiting than the boltup stresses, which is reflected by the nonlinear portion of curve B. The non-linear portion of the curve is dependent on non-beltline and beltline regions, with the beltline region temperature limits having been adjusted to account for vessel irradiation (up to a

-The maximum heatup/castdown rate of 100 * F/hour is applicable.

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Figures 3.6.K-1 through 3.6.K-3 Pressure Testing

As indicated in Figure 3.3.6.K-1 through 3.6.K-3 for pressure testing, the minimum metal temperature of the reactor vessel shell is 83°F for reactor pressures less than 312 psig. This 83°F minimum boltup temperature is based on a RT_{NDT} of 23°F for the electroslag weld immediately below the vessel flange and a 60°F conservatism required by the original ASME Code of construction. The bottom head region limit is established as 68°F, based on moderator temperature assumptions for shutdown margin analyses. At reactor pressures greater than 312 psig, the minimum vessel metal temperature is established as 113°F. The 113°F minimum temperature is based on a closure flange region RT_{NDT} of 23°F and a 90°F conservatism required by 10CFR Part 50 Appendix G. Beltline curves as a function of vessel exposure for 18, 20 and 22 effective full power years (EFPY) are presented to allow the use of the appropriate curve up to 22 EFPY of operation.

Figures 3.6.K-1 through 3.6.K-3 are governing for applicable pressure testing with a maximum heatup/cooldown rate of 20°F/hour.

PRIMARY SYSTEM BOUNDARY B 3/4.6 Figure 3.6.K-5 BASES non - nuclear vessel exposure of 16 EFPY). The non-beltline region is limiting between approximately 110 psig and 830 psig. Above approximately 803 psig, the beltline region becomes limiting. Pressure testing or coold own Gurve C) Core Critical Operation ST I Curve C, the core critical operation curve shown in Figure 3.6.K . is generated in accordance with 10CFR Part 50 Appendix G which requires core critical pressure-temperature limits to be 40°F above any eurve A or Blimits. Since curve Bis more limiting, (curve C)is eurve Bplus heatur Figure 3.6.K-4 Figure 36.K-5 Figure 3.6. K-4 40°F. 4 The actual shift in RT_{NDT} of the vessel material will be established periodically during operation by removing and evaluating, in accordance with ASTM E185 3 and 10CFR Part 50, Appendix H, irradiated reactor vessel material specimens installed near the inside wall of the reactor vessel in the core area. The irradiated specimens can be used with confidence in predicting reactor vessel 4 a material transition temperature shift? The operating limit curves of Figure 3.6.K-1, shall be adjusted, as required, on the basis of the specimen data and recommendations of Regulatory coo/dow * 5 Care used Guide 1.99, Revision 2. 100 through 3.6.K-5 embrittlement 1dat Reactor Steam Dome Pressure 3/4.6.L The reactor steam dome pressure is an assumed initial condition of Design Basis Accidents and MUCO transients and is also an assumed value in the determination of compliance with reactor pressure vessel overpressure protection criteria. The reactor steam dome pressure of ≤1005 psig is an maxis initial condition of the vessel overpressure protection analysis. This analysis assumes an initial maximum reactor steam dome pressure and evaluates the response of the pressure relief system, primarily the safety valves, during the limiting pressurization transient. The determination of compliance with the overpressure criteria is dependent on the initial reactor steam dome pressure; therefore, the limit on this pressure ensures that the assumptions of the overpressure protection

analysis are conserved.

3/4.6.M Main Steam Line Isolation Valves

Double isolation valves are provided on each of the main steam lines to minimize the potential leakage paths from the containment in case of a line break. Only one valve in each line is required to maintain the integrity of the containment, however, single failure considerations require that two valves be OPERABLE. The surveillance requirements are based on the operating history of this type of valve. The maximum closure time has been selected to contain fission products and to ensure the core is not uncovered following line breaks. The minimum closure time is consistent with the assumptions in the safety analyses to prevent pressure surges.

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3.6 - LIMITING CONDITIONS FOR OPERATION

K. Pressure/Temperature Limits

The feactor coolant system temperature and pressure shall be limited in accordance with the limit lines shown on Figure 3.6.K-1 (1) curve A for hydrostatic or leak testing; (2) curve B for heatup by non-nuclear means, cooldown following a nuclear shutdown and low power PHYSICS TESTS; and (3) curve C for operations with a critical core other than low power PHYSICS TESTS, with:

- A maximum reactor coolant heatup of 100°F in any one hour period,
- A maximum reactor coolant cooldown of 100°F in any one hour period,
- A maximum reactor coolant temperature change of ≤20°F in any one hour period during inservice hydrostatic and leak testing operations above the heatup and cooldown limit curves, and
- The reactor vessel flange and head flange temperature ≥100°F when reactor vessel head bolting studs are under tension.

APPLICABILITY:

At all times.

INSORT A

4.6 - SURVEILLANCE REQUIREMENTS

- K. Pressure/Temperature Limits
 - During system heatup, cooldown and inservice leak and hydrostatic testing operations, the reactor coolant system temperature and pressure shall be determined to be within the required heatup and cooldown limits and to the right of the limit lines of Figure 3.6.K-1 curves A, or B, as applicable, at least once per 30 minutes.
 - The reactor coolant system temperature and pressure shall be determined to be to the right of the criticality limit line of Figure 3.6.K-1 curve C within 15 minutes prior to the withdrawal of control rods to bring the reactor to criticality and at least once per 30 minutes during system heatup.
 - The reactor vessel material surveillance specimens shall be removed and examined, to determine changes in reactor pressure vessel material properties in accordance with 10CFR Part 50, Appendix H.
 - The reactor vessel flange and head flange temperature shall be verified to be ≥100°F:
 - a. In OPERATIONAL MODE 4 when the reactor coolant temperature is:
 - ≤130°F, at least once per 12 hours.
 - ≤110°F, at least once per 30 minutes.
 - b. Within 30 minutes prior to and at least once per 30 minutes during tensioning of the reactor vessel head bolting studs.

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K. Pressure/Temperature Limits

The primary system coolant system temperature and reactor vessel metal temperature and pressure shall be limited as specified below:

- 1. Pressure Testing:
 - a. The reactor vessel metal temperature and pressure shall be maintained within the Acceptable Regions as shown on Figures 3.6.K-1 through 3.6.K-3 with the rate of change of the primary system coolant temperature ≤ 20°F per hour, or
 - b. The rate of change of the primary system coolant temperature shall be ≤100°F per hour when reactor vessel metal temperature and pressure is maintained within the Acceptable Regions as shown on Figure 3.6.K-4.
- Non-Nuclear Heatup and Cooldown and low power PHYSICS TESTS:
 - The reactor vessel metal temperature and pressure shall be maintained within the Acceptable Regions as shown on Figure 3.6.K-4, and
 - b. The rate of change of the primary system coolant temperature shall be ≤100°F per hour.

K. Pressure/Temperature Limits

Insert A

- During non-nuclear heatup or cooldown, and pressure testing operations, at least once per 30 minutes,
 - The rate of change of the primary system coolant temperature shall be determined to be within the heatup and cooldown rate limits, and
 - b. The reactor vessel metal temperature and pressure shall be determined to be within the Acceptable Regions on Figures 3.6.K-1 through 3.6.K-4.
- For reactor critical operation, determine within 15 minutes prior to the withdrawal of control rods and at least once per 30 minutes during primary system heatup or cooldown,
 - The rate of change of the primary system coolant temperature to be within the limits, and
 - b. The reactor vessel metal temperature and pressure to be within the Acceptable Region on Figure 3.6.K-5.
- The reactor vessel material surveillance specimens shall be removed and examined, to determine changes in reactor pressure vessel material properties in accordance with 10CFR Part 50, Appendix H.

INSERT A (CONT)

- 3. Nuclear Heatup and Cooldown:
 - The reactor vessel metal temperature and pressure shall be maintained within the Acceptable Region as shown on Figure 3.6.K-5, and
 - b. The rate of change of the primary system coolant temperature shall be ≤100°F per hour.
- The reactor vessel flange and head flange temperature ≥83 °F when reactor vessel head bolting studs are under tension.

APPLICABILITY:

At all times.

- The reactor vessel flange and head flange temperature shall be verified to be ≥83°F:
 - a. In OPERATIONAL MODE 4 when the reactor coolant temperature is:
 - ≤113°F, at least once per 12 hours.
 - ≤93°F, at least once per 30 minutes.
 - Within 30 minutes prior to and at least once per 30 minutes during tensioning of the reactor vessel head bolting studs.

3.6 - LIMITING CONDITIONS FOR OPERATION

4.6 - SURVEILLANCE REQUIREMENTS

ACTION:

With any of the above limits exceeded,

 Restore the temperature and/or pressure to within the limits within 30 minutes, and

- Perform an engineering evaluation to determine the effects of the out-of-limit condition on the structural integrity of the reactor coolant system and determine that the reactor coolant system remains acceptable for continued operations or within 72 hours,
- Be in at least HOT SHUTDOWN within 12 hours and in COLD SHUTDOWN within the following 24 hours.

 Restore the reactor vessel metal temperature and/or pressure to within the limits within 30 minutes without exceeding the applicable primary system coolant temperature rate of change limit, and

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BASES

3/4.6.J Specific Activity

The limitations on the specific activity of the primary coolant ensure that the 2 hour thyroid and whole body doses resulting from a main steam line failure outside the containment during steady state operation will not exceed small fractions of the dose guidelines of 10 CFR 100. The values for the limits on specific activity represent interim limits based upon a parametric evaluation by the NRC of typical site locations. These values are conservative in that specific site parameters, such as site boundary location and meteorological conditions, were not considered in this evaluation.

The ACTION statement permitting POWER OPERATION to continue for limited time periods with the primary coolant's specific activity greater than 0.2 microcuries per gram DOSE EQUIVALENT I-131, but less than or equal to 4.0 microcuries per gram DOSE EQUIVALENT I-131, accommodates possible iodine spiking phenomenon which may occur following changes in THERMAL POWER. Information obtained on iodine spiking will be used to assess the parameters associated with spiking phenomena. A reduction in frequency of isotopic analysis following power changes may be permissible if justified by the data obtained.

Closing the main steam line isolation valves prevents the release of activity to the environs should a steam line rupture occur outside containment. The surveillance requirements provide adequate assurance that excessive specific activity levels in the reactor coolant will be detected in sufficient time to take corrective action.

3/4.6.K Pressure/Temperature Limits

All components in the reactor coolant system are designed to withstand the effects of cyclic loads due to system temperature and pressure changes. These cyclic loads are introduced by normal load transients, reactor trips, and startup and shutdown operations. The various categories of load cycles used for design purposes are provided in Section 3.9.1.1.1 of the UFSAR. During startup and shutdown, the rates of temperature and pressure changes are limited so that the maximum specified heatup and cooldown rates are consistent with the design assumptions and satisfy the stress limits for cyclic operation.

During heatup, the thermal gradients in the reactor vessel wall produce thermal stresses which vary from compressive at the inner wall to tensile at the outer wall. These thermal induced compressive stresses tend to alleviate the tensile stresses induced by the internal pressure. Therefore, a pressure temperature curve based on steady state conditions, i.e., no thermal stresses, represents a lower bound of all similar curves for finite heatup rates when the inner wall of the vessel is treated as the governing location.

The heatup analysis also covers the determination of pressure temperature limitations for the case in which the outer wall of the vessel becomes the controlling location. The thermal gradients established during heatup produce tensile stresses which are already present. The thermal induced stresses at the outer wall of the vessel are tensile and are dependent on both the rate of heatup and the time along the heatup ramp; therefore, a lower bound curve similar to that described for

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	the heatup of the inner wall cannot be defined. Subsequently, for the cases in which the outer wall of the vessel becomes the stress controlling location, each heatup rate of interest must be
a	3/2 K-1 thank 3.6 K-3) (are)
Tree of the second seco	the pressure-temperature limit lines shown (in Figure 3.6.K-1), for operating conditions; (inservice) ydrostatic Testing (curve A), Non-Nuclear Heatup/Cooldown (curve B), and Core Critical peration (curve G). The curves have been established to be in conformance with Appendix G to D CFR Part 50 and Regulatory Guide 1.99 Revision 2, and take into account the change in diference nil-ductility transition temperature (RT_{NOT}) as a result of neutron embrittlement. The dijusted reference temperature (ART) of the limiting vessel material is used to account for radiation effects. Figure 3.6.K-5 (Figure 3.6.K-4) (Figure 3.6.K-4)
th cl ac in in fl te	the core beltline region; 2) the non-beltline region (other than the closure flange region); (and 3) the osure flange region. The beltline region is defined as that region of the reactor vessel that rectly surrounds the effective height of the reactor core and is subject to an RT _{NDT} adjustment to count for radiation embrittlement. The non-beltline part closure flange region (preceive) sufficient fluence to necessitate an RT _{NDT} adjustment. These regions contain components which clude; the reactor vessel nozzles, closure flanges, top and bottom head plates, control rod drive enetrations, and shell plates that do not directly surround the reactor core. Although the closure ange region, (so non-beltline region) is treated separately for the development of the pressure-
lin fc bi fl	evaluating the adequacy of the steel which comprises the reactor vessel, it is necessary that the ollowing be established: 1) the RT _{NDT} for all vessel and adjoining materials; 2) the relationship etween RT _{NDT} and integrated neutron flux (fluence, at energies greater than one Mev); and 3) the uence at the location of a postulated flaw.
Ŷ	Boltup Temperature (in 23°F)
	The initial RT _{NOT} of the main closure flanges, the shell and head materials connecting to these flanges, and connecting welds (s 10°F; however) the vertical/electroslag welds which terminate immediately below the vessel flange (heve an RT _{NDY} of 40°F). Therefore, the minimum allowable boltup temperature is established as (100°F) (RT _{NDY} + 60°F) which includes a 60°F
	conservatism required by the original ASME Code of construction.
	Corve A - Hydrotesting

INSERT B

Figures 3.6.K-1 through 3.6 Pressure Testing

As indicated in Fig. K-1 through 3.6.K-3 for pressure testing, the minimum metal temperature of the reconvessel shell is 83°F for reactor pressures less than 312 psig. This 83°F minimum boltup temperature is based on a RT_{NDT} of 23°F for the electroslag weld immediately below the vessel flange and a 60°F conservatism required by the original ASME Code of construction. The bottom head region limit is established as 68°F, based on moderator temperature assumptions for shutdown margin analyses. At reactor pressures greater than 312 psig, the minimum vessel metal temperature is established as 113°F. The 113°F minimum temperature is based on a closure flange region RT_{NDT} of 23°F and a 90°F conservatism required by 10CFR Part 50 Appendix G. Beltline curves as a function of vessel exposure for 18, 20 and 22 effective full power years (EFPY) are presented to allow the use of the appropriate curve up to 22 EFPY of operation.

Figures 3.6.K-1 through 3.6.K-3 are governing for applicable pressure testing with a maximum heatup/cooldown rate of 20°F/hour.

	 for pressure in excess of 20% of the preservice hydrostatic test pressure (1563 psig). At approximately 650 psig the effects of pressurization are more limiting than the boltup stresses at the closure flange region, hence a fainly of non-linear curves intersect the 130°F vertical line. Beltline as well as non-beltline curves have been provided to allow separate monitoring of the two regions. Beltline curves as a function of vessel exposure for 12, 14 and 16 effective full power years (EFPY) are presented to allow the use of the appropriate curve up to 16 EFPY of operation. A typical sequence involved in pressure testing is a heatup to the required temperature and then pressurization to the required pressure for the inspection. During the heatup, at 100°F/hour or less, Curve B is the governing curve. Since the vessel is not pressurized during the heatup, Curves A and B are the same. When temperatures are stabilized to within 20°F/hour rates, at temperatures above those required by curve A, pressurization begins, at which point Curve A is the governing curve. During the inspection period with the vessel at the required pressure testing the inspection period with the vessel at the required pressure actions.
non-nuclear heatup/cooldown	Every Bernore processory temperature energies are minical to 20 Trinder. Figure 3.6.K-4 Curve Bernore Figure 3.6.K applies during heatups with non-nuclear heat (e.g., recirculation pump heat) and during cooldowns when the reactor is not critical (e.g., following a scram). The curve provides the minimum reactor vessel metal temperatures based on the most limiting vessel stress. As indicated by the vertical 100°F line, the boltup stresses at the closure flange region are most limiting for reactor pressures below approximately 110 psig. For reactor pressures greater than approximately 110 psig, pressurization and thermal stresses become more limiting than the boltup stresses, which is reflected by the nonlinear portion of curve B. The non-linear portion of the curve is dependent on non-beltline and beltline regions, with the beltline region temperature limits having been adjusted to account for vessel irradiation (up to a vessel exposure of 16 EFPY). The non-beltline region is limiting between approximately 110 psig and 830 psig. Above approximately 803 psig, the beltline region becomes limiting. Curve C. Core Critical Operation with 10CFR Part 50 Appendix G which requires core critical pressure-temperature limits to be 40°F above any ourse A or Blimits. Since ourse B is more limiting, fourse G is curve B plus
Triit rac	40°F. Figure 3.6.K-4 Figure 3.6.K-4 Figure 3.6.K-5 Figure 3.6.K-5 Figure 3.6.K-5 Figure 3.6.K-5 Figure 3.6.K-5 Figure 3.6.K-5 Figure 3.6.K-5 Figure 3.6.K-1 Figure

ATTACHMENT B (Cont'd)

PROPOSED TECHNICAL SPECIFICATION PAGES

ATTACHMENT C EVALUATION OF SIGNIFICANT HAZARDS CONSIDERATIONS AND ENVIRONMENTAL ASSESSMENT APPLICABILITY REVIEW

The Commission has provided standards for determining whether a no significant hazards consideration exists as stated in 10CFR50.92(c). A proposed amendment to an operating license involves a no significant hazards consideration 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; or (2) 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.

ComEd proposes to amend Appendix A, Technical Specifications, Section 3/4.6.K of Facility Operating Licenses DPR-19, DPR-25, DPR-29 and DPR-30. The amendment request changes the pressure temperature (P-T) curves, Figure 3.6.K-1 and associated Bases.

ComEd has evaluated the proposed Technical Specification Amendment and determined that it does not represent a significant hazards consideration. Based on the criteria for defining a significant hazards consideration established in 10 CFR 50.92, operation of Dresden Units 2 and 3 or Quad Cities Units 1 and 2 in accordance with the proposed amendment will not:

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

The proposed changes merely adjust the reference temperature for the limiting beltline material to account for irradiation effects and provide the same level of protection as previously evaluated. The adjusted reference temperature calculations were performed utilizing the guidance contained in Regulatory Guide 1.99, Revision 2. The change is administrative in nature to reflect the extension of the operating limits to 22 EFPY. As such, these changes will not significantly increase the probability or consequences of a previously evaluated accident.

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

The proposed changes do not create the possibility of a new or different kind of accident previously evaluated for Dresden or Quad Cities Stations. No new modes of operation are introduced by the proposed changes. The revised operating limits are merely an updated of the old limits by taking into account the effects of irradiation on the limiting reactor vessel material. Use of the revised P-T curves will continue to provide the same level of protection as was previously reviewed and approved. Therefore, the proposed changes do not create the possibility of a new or different kind of accident from any previously evaluated.

The associated change to the P-T curves related to this proposed amendment does not affect any activities or equipment and are not assumed in any safety analysis to initiate any accident sequence for Dresden or Quad Cities Stations; therefore, the proposed changes do not create the possibility of a new or different kind of accident from any previously evaluated.

ATTACHMENT C EVALUATION OF SIGNIFICANT HAZARDS CONSIDERATIONS AND ENVIRONMENTAL ASSESSMENT APPLICABILITY REVIEW

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

The proposed amendment reflect an update of the P-T curves to extend the operating limit to 22 EFPY. The revised curves are based on the latest NRC guidance along with actual data for the units. The new limits retain the margin of safety to the level expected for a new vessel, adjusted for irradiation effects as required by 10CFR, Appendix G, thereby maintaining a conservative margin of safety.

Therefore, the proposed changes do not involve a significant reduction in 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.

This proposed amendment does 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.

ENVIRONMENTAL ASSESSMENT

ComEd has evaluated the proposed amendment against the criteria for identification of licensing and regulatory actions requiring environmental assessment in accordance with 10 CFR 51.21. 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 changes requested do not pose significant hazards consideration or do not involve a significant increase in the amounts, and no significant changes in the types, of any effluents that may be released off-site. Additionally, this request does not involve a significant increase in individual or cumulative occupational radiation exposure.

ATTACHMENT B

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LICENSE DPR-19/25

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3.6 - LIMITING CONDITIONS FOR OPERATION

K. Pressure/Temperature Limits

The primary system coolant system temperature and reactor vessel metal temperature and pressure shall be limited as specified below:

- 1. Pressure Testing:
 - a. The reactor vessel metal temperature and pressure shall be maintained within the Acceptable Regions as shown on Figures 3.6.K-1 through 3.6.K-3 with the rate of change of the primary system coolant temperature ≤ 20°F per hour, or
 - b. The rate of change of the primary system coolant temperature shall be ≤100°F per hour when reactor vessel metal temperature and pressure is maintained within the Acceptable Regions as shown on Figure 3.6.K-4.
- Non-Nuclear Heatup and Cooldown and low power PHYSICS TESTS:
 - The reactor vessel metal temperature and pressure shall be maintained within the Acceptable Regions as shown on Figure 3.6.K-4, and
 - b. The rate of change of the primary system coolant temperature shall be ≤100°F per hour.

4.6 - SURVEILLANCE REQUIREMENTS

- K. Pressure/Temperature Limits
 - During non-nuclear heatup or cooldown, and pressure testing operations, at least once per 30 minutes,
 - The rate of change of the primary system coolant temperature shall be determined to be within the heatup and cooldown rate limits, and
 - b. The reactor vessel metal temperature and pressure shall be determined to be within the Acceptable Regions on Figures 3.6.K-1 through 3.6.K-4.
 - For reactor critical operation, determine within 15 minutes prior to the withdrawal of control rods and at least once per 30 minutes during primary system heatup or cooldown,
 - The rate of change of the primary system coolant temperature to be within the limits, and
 - b. The reactor vessel metal temperature and pressure to be within the Acceptable Region on Figure 3.6.K-5.
 - The reactor vessel material surveillance speciment shall be removed and examined, to determine changes in reactor pressure vessel material properties in accordance with 10CFR Part 50, Appendix H.

3.6 - LIMITING CONDITIONS FOR OPERATION

- 3. Nuclear Heatup and Cooldown:
 - The reactor vessel metal temperature and pressure shall be maintained within the Acceptable Region as shown on Figure 3.6.K-5, and
 - b. The rate of change of the primary system coolant temperature shall be ≤100°F per hour.
- The reactor vessel flange and head flange temperature ≥83 °F when reactor vessel head bolting studs are under tension.

APPLICABILITY:

At all times.

ACTION:

With any of the above limits exceeded,

- Restore the reactor vessel metal temperature and/or pressure to within the limits within 30 minutes without exceeding the applicable primary system coolant temperature rate of change limit, and
- Perform an engineering evaluation to determine the effects of the out-of-limit condition on the structural integrity of the reactor coolant system and determine that the reactor coolant system remains acceptable for continued operations within 72 hours, or
- Be in at least HOT SHUTDOWN within 12 hours and in COLD SHUTDOWN within the following 24 hours.

4.6 - SURVEILLANCE REQUIREMENTS

- The reactor vessel flange and head flange temperature shall be verified to be ≥83°F:
 - a. In OPERATIONAL MODE 4 when the reactor coolant temperature is:
 - ≤113°F, at least once per 12 hours.
 - ≤93°F, at least once per 30 minutes.
 - Within 30 minutes prior to and at least once per 30 minutes during tensioning of the reactor vessel head bolting studs.

PT Limits 3/4.6.K

FIGURE 3.6.K-1

PRESSURE - TEMPERATURE LIMITS FOR PRESSURE TESTING - VALID TO 18 EFP.



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FIGURE 3.6.K-2

PRESSURE - TEMPERATURE LIMITS FOR PRESSURE TESTING - VALID TO 20 EFPY



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PRESSURE - TEMPERATURE LIMITS FOR PRESSURE TESTING - VALID TO 22 EFPY



DRESDEN - UNITS 2 & 3

FIGURE 3.6.K-4



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FIGURE 3.6.K-5



PRESSURE - TEMPERATURE LIMITS FOR CRITICAL CORE

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shutdown, the rates of temperature and pressure changes are limited so that the maximum specified heatup and cooldown rates are consistent with the design assumptions and satisfy the stress limits for cyclic operation.

The pressure-temperature limit lines are shown, for operating conditions; Pressure Testing, Figures 3.6.K-1 through 3.6.K-3, Non-Nuclear Heatup/Cooldown, Figure 3.6.K-4, and Core Critical Operation Figure 3.6.K-5. The curves have been established to be in conformance with Appendix G to 10 CFR Part 50 and Regulatory Guide 1.99 Revision 2, and take into account the change in reference nil-ductility transition temperature (RT_{NDT}) as a result of neutron embrittlement. The adjusted reference temperature (ART) of the limiting vessel material is used to account for irradiation effects.

Four vessel regions are considered for the development of the pressure-temperature curves: 1) the core beltline region; 2) the non-beltline region (other than the closure flange region and the bottom head region); 3) the closure flange region and 4) the bottom head region. The beltline region is defined as that region of the reactor vessel that directly surrounds the effective height of the reactor core and is subject to an RT_{NDT} adjustment to account for radiation embrittlement. The non-beltline, closure flange, and bottom head regions receive insufficient fluence to necessitate an RT_{NDT} adjustment. These regions contain components which include; the reactor vessel nozzles, closure flanges, top and bottom head plates, control rod drive penetrations, and shell plates that do not directly surround the reactor core. Although the closure flange and bottom head regions are non-beltline regions, they are treated separately for the development of the pressure-temperature curves to address 10CFR Part 50 Appendix G requirements.

Boltup Temperature

The limiting initial RT_{NDT} of the main closure flanges, the shell and head materials connecting to these flanges, connecting welds and the vertical electroslag welds which terminate immediately below the vessel flange is 23°F. Therefore, the minimum allowable boltup temperature is established as 83°F ($RT_{NDT} + 60°F$) which includes a 60°F conservatism required by the original ASME. Code of construction.

Figures 3.6.K-1 through 3.6.K-3 - Pressure Testing

As indicated in Figure 3.6.K-1 through 3.6.K-3 for pressure testing, the minimum metal temperature of the reactor vessel shell is 83°F for reactor pressures less than 312 psig. This 83°F minimum boltup temperature is based on a RT_{NDT} of 23°F for the electroslag weld immediately below the vessel flange and a 60°F conservatism required by the original ASME Code of construction. The bottom head region limit is established as 68°F, based on moderator temperature assumptions for shutdown margin analyses. At reactor pressures greater than 312 psig, the minimum vessel metal temperature is established as 113°F. The 113°F minimum temperature is based on a closure flange region RT_{NDT} of 23°F and a 90°F conservatism required by 10CFR Part 50 Appendix G. Beltline curves as a function of vessel exposure for 18, 20 and 22 effective full power years (EFPY) are presented to allow the use of the appropriate curve up to 22 EFPY of operation.

Figures 3.6.K-1 through 3.6.K-3 are governing for applicable pressure testing with a maximum heatup/cooldown rate of 20°F/hour.

Figure 3.6.K-4 - Non-Nuclear Heatup/Cooldown

Figure 3.6.K-4 applies during heatups with non-nuclear heat (e.g., recirculation pump heat) and during cooldowns when the reactor is not critical (e.g., following a scram). The curve provides the minimum reactor vessel metal temperatures based on the most limiting vessel stress. The maximum heatup/cooldown rate of 100°F/hour is applicable.

Figure 3.6.K-5 - Core Critical Operation

The core critical operation curve shown in Figure 3.6.K-5, is generated in accordance with 10CFR Part 50 Appendix G which requires core critical pressure-temperature limits to be 40°F above any pressure testing or non-nuclear heatup/cooldown limits. Since Figure 3.6.K-4 is more limiting, Figure 3.6.K-5 is Figure 3.6.K-4 plus 40°F. The maximum heatup/cooldown rate of 100°F/hour is applicable.

The actual shift in RT_{NDT} of the vessel material will be established periodically during operation by removing and evaluating, in accordance with ASTI E185-82 and 10CFR Part 50, Appendix H, irradiated reactor vessel material specimens installed near the inside wall of the reactor vessel in the core area. The irradiated specimens are used in predicting reactor vessel material embrittlement. The operating limit curves of Figures 3.6.K-1 through 3.6.K-5 shall be adjusted, as required, on the basis of the specimen data and recommendations of Regulatory Guide 1.99, Revision 2.

3/4.6.L Reactor Steam Dome Pressure

The reactor steam dome pressure is an assumed initial condition of Design Basis Accidents and transients and is also an assumed value in the determination of compliance with reactor pressure vessel overpressure protection criteria. The reactor steam dome pressure of ≤1005 psig is an initial condition of the vessel overpressure protection analysis. This analysis assumes an initial maximum reactor steam dome pressure and evaluates the response of the pressure relief system, primarily the safety valves, during the limiting pressurization transient. The determination of compliance with the overpressure criteria is dependent on the initial reactor steam dome pressure; therefore, the limit on this pressure ensures that the assumptions of the overpressure protection analysis are conserved.

3/4.6.M Main Steam Line Isolation Valves

Double isolation valves are provided on each of the main steam lines to minimize the potential leakage paths from the containment in case of a line break. Only one valve in each line is required to maintain the integrity of the containment, however, single failure considerations require that two valves be OPERABLE. The surveillance requirements are based on the operating history of this type of valve. The maximum closure time has been selected to contain fission products and to ensure the core is not

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uncovered following line breaks. The minimum closure time is consistent with the assumptions in the safety analyses to prevent pressure surges.

3/4.6.N Structural Integrity

The inspection programs for ASME Code Class 1, 2 and 3 components ensure that the structural integrity of these components will be maintained at an acceptable level throughout the life of the plant.

The inservice inspection program for ASME Code Class 1, 2 and 3 components will be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable addenda as required by 10 CFR Part 50.55a(g) except where specific written relief has been granted by the NRC pursuant to 10 CFR Part 50.55a(g)(6)(i).

3/4.6.0 Shutdown Cooling - HOT SHUTDOWN

3/4.6.P Shutdown Cooling - COLD SHUTDOWN

Irradiated fuel in the reactor pressure vessel generates decay heat during normal and abnormal shutdown conditions, potentially resulting in an increase in the temperature of the reactor coolant. This decay heat is required to be removed such that the reactor coolant temperature can be reduced in preparation for performing refueling, maintenance operations or for maintaining the reactor in cold shutdown conditions. Systems capable of removing decay heat are therefore required to perform these functions.

A single shutdown cooling mode loop provides sufficient heat removal capability for removing core decay heat and mixing to assure accurate temperature indication, however, single failure considerations require that two loops be OPERABLE or that alternate methods capable of decay heat removal be demonstrated and that an alternate method of coolant mixing be in operation.

3.6 - LIMITING CONDITIONS FOR OPERATION

K. Pressure/Temperature Limits

The primary system coolant system temperature and reactor vessel metal temperature and pressure shall be limited as specified below:

- 1. Pressure Testing:
 - a. The reactor vessel metal temperature and pressure shall be maintained within the Acceptable Regions as shown on Figures 3.6.K-1 through 3.6.K-3 with the rate of change of the primary system coolant temperature ≤ 20°F per hour.
 - b. The rate of change of the primary system coolant temperature shall be ≤100°F per hour when reactor vessel metal temperature and pressure is maintained within the Acceptable Regions as shown on Figure 3.6.K-4.
- Non-Nuclear Heatup and Cooldown and low power PHYSICS TESTS:
 - The reactor vessel metal temperature and pressure shall be maintained within the Acceptable Regions as shown on Figure 3.6.K-4, and
 - b. The rate of change of the primary system coolant temperature shall be ≤100°F per hour.

4.6 - SURVEILLANCE REQUIREMENTS

- K. Pressure/Temperature Limits
 - During non-nuclear heatup or cooldown, and pressure testing operations, at least once per 30 minutes,
 - The rate of change of the primary system coolant temperature shall be determined to be within the heatup and cooldown rate limits, and
 - b. The reactor vessel metal temperature and pressure shall be determined to be within the Acceptable Regions on Figures 3.6.K-1 through 3.6.K-4.
 - For reactor critical operation, determine within 15 minutes prior to the withdrawal of control rods and at least once per 30 minutes during primary system heatup or cooldown,
 - The rate of change of the primary system coolant temperature to be within the limits, and
 - b. The reactor vessel metal temperature and pressure to be within the Acceptable Region on Figure 3.6.K-5
 - The reactor vessel material surveillance specimens shall be removed and examined, to determine changes in reactor pressure vessel material properties in accordance with 10CFR Part 50, Appendix H.

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3.6 - LIMITING CONDITIONS FOR OPERATION

K. Pressure/Temperature Limits

The primary system coolant system temperature and reactor vessel metal temperature and pressure shall be limited as specified below:

- 1. Pressure Testing:
 - a. The reactor vessel metal temperature and pressure shall be maintained within the Acceptable Regions as shown on Figures 3.6.K-1 through 3.6.K-3 with the rate of change of the primary system coolant temperature ≤ 20°F per hour, or
 - b. The rate of change of the primary system coolant temperature shall be ≤100°F per hour when reactor vessel metal temperature and pressure is maintained within the Acceptable Regions as shown on Figure 3.6.K-4.
- Non-Nuclear Heatup and Cooldown and low power PHYSICS TESTS:
 - The reactor vessel metal temperature and pressure shall be maintained within the Acceptable Regions as shown on Figure 3.6.K-4, and
 - b. The rate of change of the primary system coolant temperature shall be ≤100°F per hour.

4.6 - SURVEILLANCE REQUIREMENTS

- K. Pressure/Temperature Limits
 - During non-nuclear heatup or cooldown, and pressure testing operations, at least once per 30 minutes,
 - The rate of change of the primary system coolant temperature shall be determined to be within the heatup and cooldown rate limits, and
 - b. The reactor vessel metal temperature and pressure shall be determined to be within the Acceptable Regions on Figures 3.6.K-1 through 3.6.K-4.
 - For r actor critical operation, determine within 15 minutes prior to the withdrawal of control rods and at least once per 30 minutes during primary system heatup or cooldown,
 - The rate of change of the primary system coolant temperature to be within the limits, and
 - b. The reactor vessel metal temperature and pressure to be within the Acceptable Region on Figure 3.6.K-5.
 - The reactor vessel material surveillance specimens shall be removed and examined, to determine changes in reactor pressure vessel material properties in accordance with 10CFR Part 50, Appendix H.

3.6 - LIMITING CONDITIONS FOR OPERATION

- 3. Nuclear Heatup and Cooldown:
 - The reactor vessel metal temperature and pressure shall be maintained within the Acceptable Region as shown on Figure 3.6.K-5, and
 - b. The rate of change of the primary system coolant temperature shall be ≤100°F per hour.
- The reactor vessel flange and head flange temperature ≥83 °F when reactor vessel head bolting studs are under tension.

APPLICABILITY:

At all times.

ACTION:

With any of the above limits exceeded,

- Restore the reactor vessel metal temperature and/or pressure to within the limits within 30 minutes without exceeding the applicable primary system coolant temperature rate of change limit, and
- Perform an engineering evaluation to determine the effects of the out-of-limit condition on the structural integrity of the reactor coolant system and determine that the reactor coolant system remains acceptable for continued operations within 72 hours, or
- Be in at least HOT SHUTDOWN within 12 hours and in COLD SHUTDOWN within the following 24 hours. the following 24 hours.

4.6 - SURVEILLANCE REQUIREMENTS

- The reactor vessel flange and head flange temperature shall be verified to be ≥83°F:
 - a. In OPERATIONAL MODE 4 when the reactor coolant temperature is:
 - 1) ≤113°F, at least once per 12 hours.
 - 2) ≤93°F, at least once per 30 minutes.
 - b. Within 30 minutes prior to and at least once per 30 minutes during tensioning of the reactor vessel head bolting studs.

FIGURE 3.6.K-1

PRESSURE - TEMPERATURE LIMITS FOR PRESSURE TESTING - VALID TO 18 EFPY



QUAD CITIES - UNITS 1 & 2

3/4.6-21a

PT Limits 3/4.6.K

FIGURE 3.6.K-2

PRESSURE - TEMPERATURE LIMITS FOR PRESSURE TESTING - VALID TO 20 EFPY



QUAD CITIES - UNITS 1 & 2

3/4.6-21b

PT Limits 3/4.6.K

FIGURE 3.6.K-3

PRESSURE - TEMPERATURE LIMITS FOR PRESSURE TESTING - VALID TO 22 EFPY



QUAD CITIES - UNITS 1 & 2

3/4.6-21c

FIGURE 3.6.K-4



QUAD CITIES - UNITS 1 & 2

14.

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FIGURE 3.6.K-5



QUAD CITIES - UNITS 1 & 2

3/4.6-21e

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3/4.6.J Specific Activity

The limitations on the specific activity of the primary coolant ensure that the 2 hour thyroid and whole body doses resulting from a main steam line failure outside the containment during steady state operation will not exceed small fractions of the dose guidelines of 10 CFR 100. The values for the limits on specific activity represent interim limits based upon a parametric evaluation by the NRC of typical site locations. These values are conservative in that specific site parameters, such as site boundary location and meteorological conditions, were not considered in this evaluation.

The ACTION statement permitting POWER OPERATION to continue for limited time periods with the primary coolant's specific activity greater than 0.2 microcuries per gram DOSE EQUIVALENT I-131, but less than or equal to 4.0 microcuries per gram DOSE EQUIVALENT I-131, accommodates possible iodine spiking phenomenon which may occur following changes in THERMAL POWER. Information obtained on iodine spiking will be used to assess the parameters associated with spiking phenomena. A reduction in frequency of isotopic analysis following power changes may be permissible if justified by the data obtained.

Closing the main steam line isolation valves prevents the release of activity to the environs should a steam line rupture occur outside containment. The surveillance requirements provide adequate assurance that excessive specific activity levels in the reactor coolant will be detected in sufficient time to take corrective action.

3/4.6.K Pressure/Temperature Limits

All components in the reactor coolant system are designed to withstand the effects of cyclic loads due to system temperature and pressure changes. These cyclic loads are introduced by normal load transients, reactor trips, and startup and shutdown operations. The various categories of load cycles used for design purposes are provided in Section 3.9.1.1.1 of the UFSAR. During startup and shutdown, the rates of temperature and pressure changes are limited so that the maximum specified heatup and cooldown rates are consistent with the design assumptions and satisfy the stress limits for cyclic operation.

The pressure-temperature limit lines are shown, for operating conditions; Pressure Testing, Figures 3.6.K-1 through 3.6.K-3 Non-Nuclear Heatup/Cooldown, Figure 3.6.K-4 and Core Critical Operation Figure 3.6.K-5. The curves have been established to be in conformance with Appendix G to 10 CFR Part 50 and Regulatory Guide 1.99 Revision 2, and take into account the change in reference nil-ductility transition temperature (RT_{NDT}) as a result of neutron embrittlement. The adjusted reference temperature (ART) of the limiting vessel material is used to account for irradiation effects.

Four vessel regions are considered for the development of the pressure-temperature curves: 1) the core beltline region; 2) the non-beltline region (other than the closure flange region and the bottom head region); 3) the closure flange region and 4) the bottom head region. The beltline

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region is defined as that region of the reactor vessel that directly surrounds the effective height of the reactor core and is subject to an RT_{NDT} adjustment to account for radiation embrittlement. The non-beltline, closure flange, and bottom head regions receive insufficient fluence to necessitate an RT_{NDT} adjustment. These regions contain components which include; the reactor vessel nozzles, closure flanges, top and bottom head plates, control rod drive penetrations, and shell plates that do not directly surround the reactor core. Although the closure flange and bottom head regions are non-beltline regions, they are treated separately for the development of the pressure-temperature curves to address 10CFR Part 50 Appendix G requirements.

Boltup Temperature

The limiting initial RT_{NDT} of the main closure flanges, the shell and head materials connecting to these flanges, connecting welds and the vertical electroslag welds which terminate immediately below the vessel flange is 23°F. Therefore, the minimum allowable boltup temperature is established as 83°F ($RT_{NDT} + 60°F$) which includes a 60°F conservatism required by the original ASME Code of construction.

Figures 3.6.K-1 through 3.6.K-3 Pressure Testing

As indicated in Figure 3.3.6.K-1 through 3.6.K-3 for pressure testing, the minimum metal temperature of the reactor vessel shell is 83°F for reactor pressures less than 312 psig. This 83°F minimum boltup temperature is based on a RT_{NDT} of 23°F for the electroslag weld immediately below the vessel flange and a 60°F conservatism required by the original ASME Code of construction. The bottom head region limit is established as 68°F, based on moderator temperature assumptions for shutdown margin analyses. At reactor pressures greater than 312 psig, the minimum vessel metal temperature is established as 113°F. The 113°F minimum temperature is based on a closure flange region RT_{NDT} of 23°F and a 90°F conservatism required by 10CFR Part 50 Appendix G. Beltline curves as a function of vessel exposure for 18, 20 and 22 effective full power years (EFPY) are presented to allow the use of the appropriate curve up to 22 EFPY of operation.

Figures 3.6.K-1 through 3.6.K-3 are governing for applicable pressure testing with a maximum heatup/cooldown rate of 20°F/hour.

Figure 3.6.K-4 - Non-Nuclear Heatup/Cooldown

Figure 3.6.K-4 applies during heatups with non-nuclear heat (e.g., recirculation pump heat) and during cooldowns when the reactor is not critical (e.g., following a scram). The curve provides the minimum reactor vessel metal temperatures based on the most limiting vessel stress. The maximum heatup/cooldown rate of 100°F/hour is applicable.

Figure 3.6.K-5 - Core Critical Operation

The core critical operation curve shown in Figure 3.6.K-5, is generated in accordance with 10CFR Part 50 Appendix G which requires core critical pressure-temperature limits to be 40°F above any Pressure testing or non-nuclear heatup/cooldown limits. Since Figure 3.6.K-4 is more limiting, Figure 3.6.K-5 is Figure 3.6.K-4 plus 40°F. The maximum heatup/cooldown rate of 100°F/hour is applicable.

The actual shift in RT_{NDT} of the vessel material will be established periodically during operation by removing and evaluating, in accordance with ASTM E185-82 and 10CFR Part 50, Appendix H, irradiated reactor vessel material specimens installed near the inside wall of the reactor vessel in the core area. The irradiated specimens are used in predicting reactor vessel material embrittlement. The operating limit curves of Figures 3.6.K-1 through 3.6.K-5 shall be adjusted, as required, on the basis of the specimen data and recommendations of Regulatory Guide 1.99, Revision 2.

3/4.6.L Reactor Steam Dome Pressure

The reactor steam dome pressure is an assumed initial condition of Design Basis Accidents and transients and is also an assumed value in the determination of compliance with reactor pressure vessel overpressure protection criteria. The reactor steam dome pressure of ≤1005 psig is an initial condition of the vessel overpressure protection analysis. This analysis assumes an initial maximum reactor steam dome pressure and evaluates the response of the pressure relief system, primarily the safety valves, during the limiting pressurization transient. The determination of compliance with the overpressure criteria is dependent on the initial reactor steam dome pressure; therefore, the limit on this pressure ensures that the assumptions of the overpressure protection analysis are conserved.

3/4.6.M Main Steam Line Isolation Valves

Double isolation valves are provided on each of the main steam lines to minimize the potential leakage paths from the containment in case of a line break. Only one valve in each line is required to maintain the integrity of the containment, however, single failure considerations require that two valves be OPERABLE. The surveillance requirements are based on the operating history of this type of valve. The maximum closure time has been selected to contain fission products and to ensure the core is not uncovered following line breaks. The minimum closure time is consistent with the assumptions in the safety analyses to prevent pressure surges.

3/4.6.N Structural Integrity

The inspection programs for ASME Code Class 1, 2 and 3 components ensure that the structural integrity of these components will be maintained at an acceptable level throughout the life of the plant.

The inservice inspection program for ASME Code Class 1, 2 and 3 components will be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable addenda as

required by 10 CFR Part 50.55a(g) except where specific written relief has been granted by the NRC pursuant to 10 CFR Part 50.55a(g)(6)(i).

3/4.6.0 Residual Heat Removal - HOT SHUTDOWN

3/4.6.P Residual Heat Removal - COLD SHUTDOWN

Irradiated fuel in the reactor pressure vessel generates decay heat during normal and abnormal shutdown conditions, potentially resulting in an increase in the temperature of the reactor coolant. This decay heat is required to be removed such that the reactor coolant temperature can be reduced in preparation for performing refueling, maintenance operations or for maintaining the reactor in cold shutdown conditions. Systems capable of removing decay heat are therefore required to perform these functions.

A single shutdown cooling mode subsystem provides sufficient heat removal capability for removing core decay heat and mixing to assure accurate temperature indication, however, single failure considerations require that two subsystems be OPERABLE or that alternate methods capable of decay heat removal be demonstrated and that an alternate method of coolant mixing be in operation. An OPERABLE RHR shutdown cooling subsystem consists of one OPERABLE RHR pump, one heat exchanger, and the associtated piping and valves. The two subsystems have a common suction source and are allowed to have a common heat exchanger and common discharge piping. Therefore, to meet the Limiting Condition for Operation, both pumps in one loop or one pump in each of the two loops must be OPERABLE. Since the piping and heat exchangers are passive components that are assumed not to fail, they are allowed to be common to both subsystems (the ability to take credit for a common heat exchanger and discharge piping only applies to the SDC mode of RHR).