ATTACHMENT 1

PROPOSED CHANGES TO APPENDIX A

TECHNICAL SPECIFICATIONS FOR

QUAD CITIES STATION UNITS 1 AND 2

FACILITY OPERATING LICENSES DPR-29 AND DPR-30

Revised Pages: 3.7/4.7-6 (DPR 29)
3.7/4.7-6a (DPR 29)
3.7/4.7-7 (DPR 29)
3.7/4.7-13 (DPR 29)

3.7/4.7-6 (DPR 30)
3.7/4.7-6a (DPR 30)
3.7/4.7-7 (DPR 30)
3.7/4.7-13 (DPR 30)

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points along the seal surface of the disk.

3) The position alarm system will annunciate in the control room if the valve opening exceeds the equivalent of 1/16 inch at all points along the seal surface of the disk.

b. Any pressure-suppression chamber-drywell vacuum breaker may be non-fully closed as indicated by the position indication and alarm systems provided that drywell to suppression chamber differential pressure decay rate is demonstrated to be not greater than 25% of the differential pressure decay rate for all vacuum breakers open the equivalent of 1/16 inch at all points along the seal surface of the disk.

c. Reactor operation may continue provided that no more than one quarter of the number of pressure suppression chamber-drywell vacuum breakers are determined to be inoperable provided that they are secured or known to be in the closed position.

d. If failure occurs in one of the two-position alarm systems for one or more vacuum breakers, reactor operation may continue provided that a differential pressure decay rate test is initiated immediately and performed every 15 days thereafter until the failure is corrected. The test shall meet the requirements of Specification 3.7.A.4.b.

2) Vacuum breaker position indication and alarm systems shall be calibrated and functionally tested.

3) At least 25% of the vacuum breakers shall be inspected such that all vacuum breakers shall have been inspected following every fourth refueling outage. If deficiencies are found, all vacuum breakers shall be inspected and deficiencies corrected.

4) A drywell to suppression chamber leak test shall demonstrate that with initial differential pressure of not less than 1.0 psi, the differential pressure decay rate does not exceed the rate which would occur through a 1-inch orifice without the addition of air or nitrogen.

5. Oxygen Concentration

a. When the reactor is in the RUN Mode, the primary containment atmosphere concentration shall be less than 4 percent oxygen concentration by volume, except as specified in 1) or 2) below:

1) Subsequent to placing the reactor in the RUN Mode, the containment atmosphere oxygen concentration shall be reduced to at least 4 percent by volume within 24 hours or within the next 6 hours be in at least the Startup/Hot Standby Mode.

5. Oxygen Concentration

The oxygen concentration in the primary containment shall be verified to be within the limit of specification 3.7.A.5.a. at least once per seven days, while in the RUN Mode.

2) Deinerting may commence 24 hours prior to a shutdown. If this 24 hour period is exceeded, be in at least the Startup/Hot Standby Mode within the next 6 hours.

b. When the oxygen concentration in the primary containment exceeds the limit given in specification 3.7.A.5.a. above, within 24 hours restore the oxygen concentration to within the limit, or within the next 6 hours be in at least the STARTUP/HOT STANDBY Mode.

6. Containment Systems

Drywell-Suppression Chamber Differential Pressure

a. When the reactor is in the RUN mode, the differential pressure between the drywell and suppression chamber shall be maintained at equal to or greater than 1.20 psid, except as specified in 1) or 2) below:

1) This differential pressure shall be established within the 24 hour period subsequent to placing the reactor mode switch into the RUN Mode during a startup when the provisions of 3.7.A.5.a.(1) apply. If this 24 hour period is exceeded, be in at least the Startup/Hot Standby Mode within the next 6 hours.

2) This differential pressure may be relaxed 24 hours prior to reactor shutdown when the provisions of 3.7.5.a.(2) apply. If this 24 hour period is exceeded, within the next 6 hours be in at least the Startup/Hot Standby Mode.

6. Containment Systems

Drywell-Suppression Chamber Differential Pressure

a. The pressure differential between the drywell and suppression chamber shall be recorded at least once each shift when in the RUN Mode.

b. When the differential pressure is less than the limit given in specification 3.7.A.6.a. above, except as specified in 3.7.A.6.c. and 3.7.A.6.d. below, within 24 hours restore the differential pressure to within the limit, or within the next 6 hours be in at least the STARTUP/HOT STANDBY Mode and in COLD SHUTDOWN within the following 24 hours.

c. This pressure differential may be decreased to less than 1.20 PSID for a maximum of 4 hours during required operability testing of the HPCI system pump, the RCIC system pump, the drywell-pressure suppression chamber vacuum breakers, and reactor pressure relief valves.

d. If the Specifications of 3.7.A.6.c. cannot be met, and the differential pressure cannot be restored within the subsequent six (6) hour period, an orderly shutdown shall be initiated and the reactor shall be in a cold shutdown condition in the following 24 hours.

B. Standby Gas Treatment System

1. Two separate and independent standby gas treatment system circuits shall be operable at all times when secondary containment integrity is required, except as specified in sections 3.7.B.1.(a) and (b).

a. After one of the standby gas treatment systems circuits is made or found to be inoperable for any reason, reactor operation and fuel handling is permissible only during the succeeding 7 days, provided that all active components in the other standby gas treatment system shall be demonstrated to be operable within 2 hours and daily thereafter. Within 36 hours following the 7 days, the reactor shall be placed in a condition for which the standby gas treatment system is not required in accordance with Specification 3.7.C.1(a) through (d).

b. If both standby gas treatment system circuits are not operable, within 36 hours the reactor shall be placed in a condition for which the standby gas treatment system is not required in accordance with Specification 3.7.C.1.(a) through (d).

B. Standby Gas Treatment System

1. At least once per month, initiate from the control room 4000 cfm (± 10%) flow through both circuits of the standby gas treatment system for at least 10 hours with the circuit heaters operating at rated power.

a. Within 2 hours from the time that one standby gas treatment system circuit is made or found to be inoperable for any reason and daily thereafter for the next succeeding 7 days, initiate from the control room 4000 cfm (± 10%) flow through the operable circuit of the standby gas treatment system for at least 10 hours with the circuit heaters operating.

hydrogen, if it is present in sufficient quantities to result in excessively rapid recombination, could result in a loss of containment integrity.

The 4% oxygen concentration by volume minimizes the possibility of hydrogen combustion following a loss-of-coolant accident. Significant quantities of hydrogen could be generated if the core cooling systems did not sufficiently cool the core. Providing an LCO by volume is consistent with the fact that the oxygen analyzer indicated in % oxygen by volume.

The occurrence of primary system leakage following a major refueling outage or other scheduled shutdown is much more probable than the occurrence of the loss-of-coolant accident upon which the specified oxygen concentration limit is based. Permiting access to the drywell for leak inspections during a startup is judged prudent in terms of the added plant safety offered without significantly reducing the margin of safety. Thus, to preclude the possibility of starting the reactor and operating for extended periods of time with significant leaks in the primary system, leak inspections are scheduled during startup periods, when the primary system is at or near rated operating temperature and pressure.

A 24-hour relaxation of the oxygen concentration requirement period is judged to be sufficient to perform the leak inspection and establish the required oxygen concentration. The 24-hour time limit also provides a restricted time period for a containment entry to be made with the reactor at power in order to affect minor repairs to safety equipment and to perform equipment lubrication. The primary containment is normally slightly pressurized during periods of reactor operation. Nitrogen used for inerting could leak out of the containment but air could not leak in to increase oxygen concentration. Once the containment is filled with nitrogen to the required concentration, no monitoring of oxygen concentration is necessary. However at least once a week, the oxygen concentration will be determined as added assurance.

In conjunction with the Mark I Containment Short Term Program, a plant unique analysis was performed (Reference 5) which demonstrated a factor of safety of at least two for the weakest element in the suppression chamber support system and attached piping. The maintenance of a drywell-suppression chamber differential pressure of 1.20 psid and a suppression chamber water level corresponding to a downcomer submergence range of 3.21 to 3.54 feet will assure the integrity of the suppression chamber when subjected to post-LOCA suppression pool hydrodynamic forces.

B. Standby Gas Treatment System

The standby gas treatment system is designed to filter and exhaust the reactor building atmosphere to the chimney during secondary containment isolation conditions, with a minimum release of radioactive materials from the reactor building to the environs. One standby gas treatment system circuit is designed to automatically start upon containment isolation and to maintain the reactor building pressure at the design negative pressure so that all leakage should be in-leakage. Should one circuit fail to start, the redundant alternate standby gas treatment circuit is designed to start automatically. Each of the two circuits has 100% capacity. Only one of the two standby gas treatment system circuits is needed to cleanup the reactor building atmosphere upon containment isolation. If one system is found to be inoperable, there is not immediate threat to the containment system performance. Therefore, reactor operation or refueling operation may continue while repairs are being made. If neither circuit is operable, the plant is placed in a condition that does not require a standby gas treatment system.

While only a small amount of particulates are released from the primary containment as a result of the loss-of-coolant accident, high-efficiency particulate filters before and after the charcoal filters are specified to minimize potential particular release to the environment and to prevent clogging of the charcoal adsorbers. The

points along the seal surface of the disk.

3) The position alarm system will annunciate in the control room if the valve opening exceeds the equivalent of 1/16 inch at all points along the seal surface of the disk.

b. Any pressure-suppression chamber-drywell vacuum breaker may be non-fully closed as indicated by the position indication and alarm systems provided that drywell to suppression chamber differential pressure decay rate is demonstrated to be not greater than 25% of the differential pressure decay rate for all vacuum breakers open the equivalent of 1/16 inch at all points along the seal surface of the disk.

c. Reactor operation may continue provided that no more than one quarter of the number of pressure suppression chamber-drywell vacuum breakers are determined to be inoperable provided that they are secured or known to be in the closed position.

d. If failure occurs in one of the two-position alarm systems for one or more vacuum breakers, reactor operation may continue provided that a differential pressure decay rate test is initiated immediately and performed every 15 days thereafter until the failure is corrected. The test shall meet the requirements of Specification 3.7.A.4.b.

2) Vacuum breaker position indication and alarm systems shall be calibrated and functionally tested.

3) At least 25% of the vacuum breakers shall be inspected such that all vacuum breakers shall have been inspected following every fourth refueling outage. If deficiencies are found, all vacuum breakers shall be inspected and deficiencies corrected.

4) A drywell to suppression chamber leak test shall demonstrate that with initial differential pressure of not less than 1.0 psi, the differential pressure decay rate does not exceed the rate which would occur through a 1-inch orifice without the addition of air or nitrogen.

5. Oxygen Concentration

a. When the reactor is in the RUN mode, the primary containment atmosphere concentration shall be less than 4 percent oxygen concentration by volume, except as specified in 1) or 2) below:

1) Subsequent to placing the reactor in the RUN Mode, the containment atmosphere oxygen concentration shall be reduced to at least 4 percent by volume within 24 hours or within the next 6 hours be in at least the Startup/Hot Standby Mode.

5. Oxygen Concentration

The oxygen concentration in the primary containment shall be verified to be within the limit of specification 3.7.A.5.a. at least once per seven days, while in the RUN Mode.

2) Deinerting may commence 24 hours prior to a shutdown. If this 24 hour period is exceeded, be in at least the Startup/Hot Standby Mode within the next 6 hours.

b. When the oxygen concentration in the primary containment exceeds the limit given in specification 3.7.A.5.a. above, within 24 hours restore the oxygen concentration to within the limit, or within the next 6 hours be in at least the STARTUP/HOT STANDBY Mode.

6. Containment Systems

Drywell-Suppression Chamber Differential Pressure

a. When the reactor is in the RUN mode, the differential pressure between the drywell and suppression chamber shall be maintained at equal to or greater than 1.20 psid, except as specified in 1) or 2) below:

1) This differential pressure shall be established within the 24 hour period subsequent to placing the reactor mode switch into the RUN Mode during a startup when the provisions of 3.7.A.5.a.(1) apply. If this 24 hour period is exceeded, be in at least the Startup/Hot Standby Mode within the next 6 hours.

2) This differential pressure may be relaxed 24 hours prior to reactor shutdown when the provisions of 3.7.5.a.(2) apply. If this 24 hour period is exceeded, within the next 6 hours be in at least the Startup/Hot Standby Mode.

b. When the differential pressure is less than the limit given in specification 3.7.A.6.a. above, except as specified in 3.7.A.6.c. and 3.7.A.6.d. below, within 24 hours restore the differential pressure to within the limit, or within the next 6 hours be in at least the STARTUP/HOT STANDBY Mode and in COLD SHUTDOWN within the following 24 hours.

6. Containment Systems

Drywell-Suppression Chamber Differential Pressure

a. The pressure differential between the drywell and suppression chamber shall be recorded at least once each shift when in the RUN Mode.

c. This pressure differential may be decreased to less than 1.20 PSID for a maximum of 4 hours during required operability testing of the HPCI system pump, the RCIC system pump, the drywell-pressure suppression chamber vacuum breakers, and reactor pressure relief valves.

d. If the Specifications of 3.7.A.6.c. cannot be met, and the differential pressure cannot be restored within the subsequent six (6) hour period, an orderly shutdown shall be initiated and the reactor shall be in a cold shutdown condition in the following 24 hours.

B. Standby Gas Treatment System

1. Two separate and independent standby gas treatment system circuits shall be operable at all times when secondary containment integrity is required, except as specified in sections 3.7.B.1.(a) and (b).

a. After one of the standby gas treatment systems circuits is made or found to be inoperable for any reason, reactor operation and fuel handling is permissible only during the succeeding 7 days, provided that all active components in the other standby gas treatment system shall be demonstrated to be operable within 2 hours and daily thereafter. Within 36 hours following the 7 days, the reactor shall be placed in a condition for which the standby gas treatment system is not required in accordance with Specification 3.7.C.1(a) through (d).

b. If both standby gas treatment system circuits are not operable, within 36 hours the reactor shall be placed in a condition for which the standby gas treatment system is not required in accordance with Specification 3.7.C.1.(a) through (d).

B. Standby Gas Treatment System

1. At least once per month, initiate from the control room 4000 cfm (± 10%) flow through both circuits of the standby gas treatment system for at least 10 hours with the circuit heaters operating at rated power.

a. Within 2 hours from the time that one standby gas treatment system circuit is made or found to be inoperable for any reason and daily thereafter for the next succeeding 7 days, initiate from the control room 4000 cfm (± 10%) flow through the operable circuit of the standby gas treatment system for at least 10 hours with the circuit heaters operating.

hydrogen, if it is present in sufficient quantities to result in excessively rapid recombination, could result in a loss of containment integrity.

The 4% oxygen concentration by volume minimizes the possibility of hydrogen combustion following a loss-of-coolant accident. Significant quantities of hydrogen could be generated if the core cooling systems did not sufficiently cool the core. Providing an LCO by volume is consistent with the fact that the oxygen analyzer indicated in % oxygen by volume.

The occurrence of primary system leakage following a major refueling outage or other scheduled shutdown is much more probable than the occurrence of the loss-of-coolant accident upon which the specified oxygen concentration limit is based. Permiting access to the drywell for leak inspections during a startup is judged prudent in terms of the added plant safety offered without significantly reducing the margin of safety. Thus, to preclude the possibility of starting the reactor and operating for extended periods of time with significant leaks in the primary system, leak inspections are scheduled during startup periods, when the primary system is at or near rated operating temperature and pressure.

A 24-hour relaxation of the oxygen concentration requirement period is judged to be sufficient to perform the leak inspection and establish the required oxygen concentration. The 24-hour time limit also provides a restricted time period for a containment entry to be made with the reactor at power in order to affect minor repairs to safety equipment and to perform equipment lubrication. The primary containment is normally slightly pressurized during periods of reactor operation. Nitrogen used for inerting could leak out of the containment but air could not leak in to increase oxygen concentration. Once the containment is filled with nitrogen to the required concentration, no monitoring of oxygen concentration is necessary. However at least once a week, the oxygen concentration will be determined as added assurance.

In conjunction with the Mark I Containment Short Term Program, a plant unique analysis was performed (Reference 5) which demonstrated a factor of safety of at least two for the weakest element in the suppression chamber support system and attached piping. The maintenance of a drywell-suppression chamber differential pressure of 1.20 psid and a suppression chamber water level corresponding to a downcomer submergence range of 3.21 to 3.54 feet will assure the integrity of the suppression chamber when subjected to post-LOCA suppression pool hydrodynamic forces.

B. Standby Gas Treatment System

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ATTACHMENT 2

SUMMARY OF CHANGES

A total of thirty (30) changes to the Quad Cities Station Units 1 and 2 Technical Specifications have been identified (15 per unit) and are listed below as follows:

1) Page 3.7/4.7-6, DPR-29 and 30

(a) Limiting Condition for Operation (LCO), Technical Specification 3.7.A.5.a - Delete Item (a) and replace with following statement, "When the reactor is in the RUN Mode, the primary containment atmosphere concentration shall be less than 4 percent oxygen concentration by volume, except as specified in 1) and 2) below;"

(b) LCO Technical Specification 3.7.A.5.a - Under new Specification 3.7.A.5.a (as identified in above Item 1 (a)), insert new Specification 3.7.A.5.a.1) which reads as follows, "Subsequent to placing the reactor in the RUN Mode, the containment ... in at least the Startup/Hot Standby Mode."

(c) Surveillance Requirements Technical Specification 4.7.A.5 - Delete Item 5, entitled "Oxygen Concentration" and replace with following statement, "The oxygen concentration in the primary containment shall be verified to be within the limit of specification 3.7.A.5.a at least once per seven days, while in the RUN Mode."

2) Page 3.7/4.7-6a, DPR-29 and 30

(a) LCO - Technical Specification 3.7.A.5.a - Insert new Specification 3.7.A.5.a.2 under 3.7.A.5.a.1 which reads as follows, "Deinerting may commence 24 hours prior to a shutdown ... within the next 6 hours."

(b) LCO - Technical Specification 3.7.A.5.b - Delete Item (b) and replace with following statement, "When the oxygen concentration in the primary containment exceeds the limit given in ... be in at least the STARTUP/HOT STANDBY Mode."

(c) LCO - Technical Specification 3.7.A.6.a - Delete Item (a) and replace with following statement, "When the reactor is in the RUN Mode, the differential pressure ... or greater than 1.20 psid, except as specified in 1) or 2) below."

(d) LCO - Technical Specification 3.7.A.6.a - Under Specification 3.7.A.6.a, insert Item 3.7.A.6.a.1, which reads as follows, "This differential pressure shall be established ... be in at least the Startup/Hot Standby Mode within the next 6 hours.

(e) LCO - Technical Specification 3.7.A.6.a - Under new Specification 3.7.A.6.a.1 (as identified in above Item 2(d)) insert new Specification 3.7.A.6.a.2, which reads as follows, "This differential pressure may be relaxed 24 hours ... be in at least the Startup/Hot Standby Mode."

(f) Surveillance Requirements 4.7.A.6.a - Delete phrase "When the differential pressure is required.", and replace with phrase "When in the RUN Mode.", so the Surveillance Requirement now reads, "The pressure differential between ... when in the RUN Mode."

3) Page 3.7/4.7-7, DPR-29 and 30

(a) Insert new item, Technical Specification 3.7.A.6.b, which reads as follows: "When the differential pressure is less than the limit given in Specification 3.7.A.6.a above ... in at least the STARTUP/HOT STANDBY Mode and in the COLD SHUTDOWN within the following 24 hours."

(b) Relabel Technical Specification Item 3.7.A.6.a.(2), to be Item 3.7.A.6.c.

(c) In existing Technical Specification 3.7.A.6.a.(2) (now relabeled to be 3.7.A.6.c) insert the word pressure preceeding the word differential so the statement now reads "This pressure differential may be ... "

(d) Relabel Technical Specification Item 3.7.A.6.b, to be Item 3.7.A.6.d.

(e) In existing Technical Specification 3.7.A.6.b (now relabeled to be 3.7.A.7.d), change "3.7.A" to "3.7.A.6.c" to reflect the above referenced changes to the Containment Systems Drywell - Suppression Chamber Differential Pressure Technical Specifications, so the sentence now reads, "If the specifications of 3.7.A.6.c cannot be met ... "

4) Page 3.7/4.7-13, DPR-29 and 30

(a) Third paragraph, first line - Delete "The 24-hour period to provide inerting" and replace with "A 24-hour relaxation of the oxygen concentration requirement period", so the sentences now read "A 24-hour relaxation ... and to perform equipment lubrication."

ATTACHMENT 3

DESCRIPTION OF PROPOSED AMENDMENT REQUEST

An item by item description of the proposed changes requested as part of this amendment is provided for information and use. Attachment 2 can be referred to in order to reference back to a given change and its affected page.

Overall, the changes that are described in this proposed amendment are a result of providing a clear action statement should the oxygen concentration or torus drywell differential pressure LCO's be exceeded. The action statement would provide 24 hours to either restore the LCO or be in STARTUP/HOT STANDBY in the subsequent 6 hours and COLD SHUTDOWN in the following 24 hours. There are several administrative changes associated with this amendment where the affected oxygen concentration or torus drywell differential pressure Technical Specifications have been renumbered as a result of this change. Finally, several changes have been made to the Technical Specification and/or Bases for clarification. These changes, as well as the numbering changes, are considered to be administrative in nature.

Items 1(a)

The proposed change rewords the applicability of the LCO to the RUN Mode.

Items 1(b)

The proposed change establishes an action statement for time clock references subsequent to going into RUN mode. Action statement requires that if this 24 hour period is exceeded, within the next 6 hours be in at least the STARTUP/HOT STANDBY MODE.

Item 1(c)

This proposed change clarifies the applicability of the oxygen concentration surveillance to the time period when the LCO is applicable, i.e., when in the RUN Mode.

Item 2(a)

This section maintains the provision of the original Technical Specification allowing deinerting to be initiated 24 hours prior to a reactor shutdown. It also provides an action statement should the 24 hour period be exceeded, within the next 6 hours be in at least the STARTUP/HOT STANDBY Mode.

Item 2(b)

The proposed change establishes a 24 hour time clock to restore the LCO or be in at least STARTUP/HOT STANDBY within the next 6 hours.

Item 2(c)

The proposed change rewords the applicability of the LCO to the RUN Mode.

Item 2(d)

The proposed change establishes an action statement for time clock references subsequent to going into the RUN Mode. Action statement requires that it the 24 hour period is exceeded, within the next 6 hours be in in at least the STARTUP/HOT STANDBY Mode.

Item 2(e)

This ection maintains the provisions of the original Technical Specification allowing the torus/drywell differential pressure to be relaxed 24 hours prior to a reactor shutdown. It also provides an action statement should the 24 prior be exceeded, within the next 6 hours be in at least the STARTUP/HOT STANDBY Mode.

Item 2(f)

This proposed change clarifies the applicability of the surveillance requirement to when in the RUN Mode in lieu of when differential pressure is required.

Item 3(a)

This proposed change creates a new paragraph in Technical Specification 3.7.A.6.b, which establishes a 24-hour time clock to restore the LCO or be in at least STARTUP/HOT STANDBY in the subsequent 6 hours and cold shutdown in the following 24 hours.

Item 3(b) & 3(c)

This proposed change is a renumbering of existing Specification 3.7.A.6.a(2) to 3.7.A.6.c because of the addition of the Technical Specification as described in Items 3(a). Additionally, the word "pressure" has been added to the existing specification for clarity. These changes are considered to be administrative in nature.

Item 3(d) & 3(e)

This proposed change renumbers existing Specification 3.7.A.6.a(3) to 3.7.A.d because of the addition of the Technical Specification as described in Item 3(a). Additionally, it incorporates the change described in Item 3(b) in the body of the specification. This is considered to be administrative in nature.

Item 4(a)

This change to the bases is provided for clarification and is considered to be administrative. It describes the 24 hour period during which examinations may be done with a deinerted containment as relaxation from the oxygen concentration LCO. The change to the bases allows for the possibility of making minor repairs during reactor power operation.

ATTACHMENT 4

BASIS FOR SIGNIFICANT HAZARDS CONSIDERATION

As stated in Attachment 3, Description of Proposed Amendment Request, there are three types of changes associated with this Technical Specification amendment. First, there are the changes which result from providing an Action Statement for oxygen concentration and torus drywell differential pressure, should the LCO's be exceeded. Secondly, there are administrative changes which result from the addition of the action statement which in some cases, required the renumbering/reformatting of existing Technical Specifications. Lastly, there are changes that have been made to the Technical Specifications and/or bases for clarification purposes. These too, are considered to be administrative in nature.

These changes have been reviewed by Commonwealth Edison 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

Commonwealth Edison 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:

   (a) Power operation is presently permitted with containment oxygen concentration greater than 4% for only 24 hours subsequent to going to RUN and 24 hours prior to a reactor shutdown. The change permits 24 hours of power operation with the primary containment deinerted unrelated to reactor startup or shutdown to allow personnel to enter the drywell at power. Drywell entries are made to identify any water leakage, affect minor repairs and enable equipment lubrication. Drywell entries other than during startup are rare. The change in time that the drywell will not be inerted during power operation allowed by this proposed change is small. Additionally, there are currently several other Mark I BWR's that are licensed for operation with a deinerted containment for periods greater than 24 hours.

   Power operation is presently permitted with drywell to torus differential pressure less than 1.2 psid for only 24 hours subsequent to going to RUN and 24 hours prior to a reactor shutdown. The change permits 24 hours or power operation without 1.2 psid differential pressure unrelated to reactor startup or shutdown to allow personnel to enter the drywell at power. There is no change in consequences of

relaxing the 1.2 psid differential pressure because the torus was analyzed for 0.0 psid as part of the Quad Cities Nculear Power Station Units 1 and 2 Plant Unique Analysis Report (Volume 2, "Suppression Chamber Analysis", Revision 0, May 1983) and was found to meet acceptance criteria.

Therefore, these changes do not significantly increa[illegible] the probability increase the probability or consequences of previously evaluated accidents.

(b) The other changes to the Technical Specifications which include the renumbering of other inter-related portions of the Technical Specifications (which were affected by the proposed change) or are changes that are being sought for clarification purposes. These changes are considered to be administrative in nature.

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

(a) The effects of short-term deinerting have been analyzed in the FSAR. Additionally, the torus was analyzed for 0.0 psid drywell to torus differential pressure as part of the Mark I containment Short Term Program and was found to meet acceptance criteria.

Consequently, the possibility of creating a new or different kind of accident from any accident previously evaluated is unchanged.

(b) The other types of changes noted in the proposed amendment are administrative in nature.

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

(a) FSAR analyses have shown that for design basis accidents, the long term combustible gas control system (ACAD/CAM) can prevent a combustible gas mixture of 4% hydrogen even with a deinerted containment. Therefore, peak containment pressure is bounded by the FSAR LOCA analysis. The margin of safety for the torus drywell differential pressure is not degraded as a result of this change because analysis of the 0.0 psid drywell to torus differential pressure concludes that acceptance criteria are met. Therefore, the pressure suppression is maintained. Hence, the changes do not reduce the margin of safety.

(b) These changes are administrative and therefore do not impact the margin of safety.

Therefore, since the proposed license amendment satisfies the criteria specified in 10 CFR 50.92, Commonwealth Edison has determined that a no significant hazards consideration exist for these items. We further request their approval in accordance with the provisions of 10 CFR 50.91(a)(4).