October 5, 1998

Mr. Oliver D. Kingsley, President
Nuclear Generation Group
Commonwealth Edison Company
Executive Towers West III
1400 Opus Place, Suite 500
Downers Grove, IL 60515

SUBJECT: TECHNICAL SPECIFICATION BASES CHANGE - QUAD CITIES NUCLEAR POWER STATION, UNITS 1 AND 2 (TAC NOS. MA2489 AND MA2490)

Dear Mr. Kingsley:

By letter dated July 31, 1998, Commonwealth Edison Company (ComEd, the licensee) submitted a change to Facility Operating License Nos. DPR-29 and DPR-30, Appendix A - Technical Specifications (TS) Bases Sections 3/4.7.D, "Primary Containment Isolation Valves" and 3/4.12.C, "Inservice Leak and Hydrostatic Testing Operation." The licensee made administrative changes to these bases sections to provide clarity and consistency with the wording between the TS and Bases. TS Section 3.12.C states: "The average reactor coolant temperature specified in Table 1-2 for OPERATIONAL MODE 4 may be changed to "NA," and operation considered not to be in OPERATIONAL MODE 3; and the requirements of LCO 3.6.P, "Residual Heat Removal - COLD SHUTDOWN," may be suspended, to allow performance of an inservice leak or hydrostatic test provided the following..."

TS Bases Section 3/4.7.D addresses excess flow check valve periodic testing which is an inservice leak test and accomplished during a vessel hydro or inservice pressure test. TS Bases Section 3/4.12.C states: "The OPERATIONAL MODE 4 requirements may only be modified for the performance of inservice pressure tests..."

To be consistent with TS 3.12.C and provide clarity in the Bases, the words "a vessel hydro" in Bases 3/4.7.D and the words "inservice pressure test" in Bases 3/4.12.C were replaced with "an inservice leak or hydrostatic test." The staff has no objections to this Bases change.

Sincerely,

ORIG. SIGNED BY:

Robert M. Pulsifer, Project Manager
Project Directorate III-2
Division of Reactor Projects - III/IV
Office of Nuclear Reactor Regulation

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Docket Nos. 50-254, 50-265

Enclosure: TS Bases pages

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NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

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Project Directorate III-2
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Enclosure: TS Bases pages

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leakage tests). The acceptance criteria were established during initial air lock and primary containment OPERABILITY testing. The periodic testing requirements verify that air lock leakage does not exceed the allowed fraction of the overall primary containment leakage rate. The Frequency is required by the Primary Containment Leakage Rate Testing Program. The surveillance requirements have been annotated such that an inoperable air lock door does not invalidate the previous successful performance of the overall air lock leakage test. This is considered reasonable since either air lock door is capable of providing a fission product barrier in the event of a DBA. Additional annotation is provided to require the results of air lock leakage tests being evaluated against the acceptance criteria applicable to the surveillance requirements. This ensures that the air lock leakage is properly accounted for in determining the combined Type B and Type C primary containment leakage.

3/4.7.D Primary Containment Isolation Valves

The OPERABILITY of the primary containment isolation valves ensures that the containment atmosphere will be isolated from the outside environment in the event of a release of radioactive material to the containment atmosphere or pressurization of the containment. Containment isolation within the time limits specified for those isolation valves designed to close automatically ensures that the release of radioactive material to the environment will be consistent with the assumptions used in the analyses for a LOCA.

The containment is also penetrated by a large number of small diameter instrument lines which contact the primary coolant system. A program for periodic testing and examination of the flow check valves in these lines is performed by blowing down the instrument line during an inservice leak or hydrostatic test and observing conditions which verify that the flow check valve is operable, e.g., a distinctive 'click' when the poppet valve seats, or an instrumentation high flow that quickly reduces to a slight trickle.

The main steam line isolation valves are tested at lower pressures, per an approved exemption, but the leakage rate is included in the Type B and C test totals. The surveillance testing for measuring leakage rates is consistent with the requirements of Appendix J of 10CFR Part 50 with the exception of approved exemptions. (Ref: Exemption Request Approval, Mr. D. B. Vassallo (NRC) to Mr. D. L. Farrar (CECo) dated June 12, 1984.)

3/4.7.E Suppression Chamber - Drywell Vacuum Breakers

The function of the suppression chamber to drywell vacuum breakers is to relieve vacuum in the drywell. These internal vacuum breakers allow air and steam flow from the suppression chamber to the drywell when the drywell is at a negative pressure with respect to the suppression chamber. Each vacuum breaker is a self-actuating valve, similar to a check valve.

The safety analysis assumes that the internal vacuum breakers are closed initially and are fully open at a differential pressure of 0.5 psid. Additionally, three of these internal vacuum breakers

OPERATIONAL MODE 4 applicable requirements that are in effect immediately prior to and immediately after this operation.

The OPERATIONAL MODE 4 requirements may only be modified for the performance of an inservice leak or hydrostatic test so that these operations can be considered as in OPERATIONAL MODE 4, even though the reactor coolant temperature is >212°F. The additional requirement for secondary containment OPERABILITY according to the imposed OPERATIONAL MODE 3 requirements provides conservatism in the response of the unit to any event that may occur. Operations in all other OPERATIONAL MODES are unaffected by this LCO.

Footnote (a) has been provided to modify the ACTIONs related to pressure testing operation. Footnote (a) allows a separate condition entry for each requirement of the LCO.

If an LCO specified in 3.12.C is not met, the ACTIONs applicable to the stated requirements are entered immediately. ACTION 1 has been modified by Footnote (b) that clarifies the intent of another LCO's ACTION to be in OPERATIONAL MODE 4 which includes reducing the average reactor coolant temperature to ≤212°F.

ACTION 2 is an alternate action that can be taken instead of ACTION 1 to restore compliance with the normal OPERATIONAL MODE 4 requirements, and thereby exit this Special Test Exception LCO's Applicability. Activities that could further increase reactor coolant temperature or pressure are suspended immediately, in accordance with ACTION 2, and the reactor coolant temperature is reduced to establish normal OPERATIONAL MODE 4 requirements. The allowed completion time of 24 hours for ACTION 2 provides sufficient time to reduce the average reactor coolant temperature from the highest expected value to ≤212°F with normal cooldown procedures. The completion time is also consistent with the time provided in LCO 3.0.C to reach OPERATIONAL MODE 4 from OPERATIONAL MODE 3.

The LCOs made applicable are required to have their Surveillances met to establish that this LCO is being met. A discussion of the applicable surveillance requirements is provided in their respective Bases.