

ATTACHMENT 1

PROPOSED CHANGES TO APPENDIX A  
TECHNICAL SPECIFICATIONS FOR  
QUAD CITIES STATION UNITS 1 and 2

FACILITY OPERATING LICENSEE DPR-29 AND DPR-30

Revised Pages: 3.7/4.7-4 (DPR-29 & DPR-30)

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## ATTACHMENT 2

### SUMMARY OF CHANGES

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

- 1) Page 3.7/4.7-4, Surveillance Requirement (S.R.)  
Technical Specification 4.7.A.s.2.d.2 - Replace the phrase "once per 18 months" with "once per operating cycle of a frequency not to exceed 24 months", so the sentence now reads "Main steam isolation valves, which shall be leak tested at least once per operating cycle at a frequency not to exceed 24 months...."

This changes the MSIV LLRT interval from 18 to 24 months. This change would still meet the requirements of 10 CFR 50 Appendix J for MSIV testing intervals and would make the intervals for MSIV LLRT's consistent with the intervals for other primary containment isolation valves.

### ATTACHMENT 3

#### EVALUATION OF SIGNIFICANT HAZARDS CONSIDERATION

##### AND DESCRIPTION OF PROPOSED AMENDMENT REQUEST

Commonwealth Edison Company proposes to amend Operating Licenses DPR-29 and DPR-30 for Quad Cities Station concerning the intervals at which Local Leak Rate Tests (LLRT's) must be performed on the Main Steam Isolation Valves (MSIV's).

This Technical Specification change requires the testing to be performed once per operating cycle, but in no case shall the interval between tests exceed 24 months. The 24-month maximum interval is specified in 10 CFR 50, Appendix J, for all primary containment isolation valves.

The current Technical Specification testing interval is 18 months. When this Technical Specification was originally drafted, the plant was operating on 12-month cycles. Thus, the 18-month testing interval per the Technical Specifications was deemed acceptable. Subsequently, the operating length has been extended to 18 months for a fuel cycle. However, the Technical Specification 18-month testing interval was never revised to account for these longer fuel cycles. The MSIV's are leak rate tested immediately after the unit has been shut down for a refueling outage. If the MSIV passes the LLRT, it will not be tested again until the beginning of the next refueling outage; that translates into the length of the refueling outage plus a normal operating cycle which is usually 18 months. As a result, the MSIV's may be required to be tested before the unit reaches the next refueling outage. To prevent such an unnecessary shutdown, Commonwealth Edison is seeking approval of this proposed amendment.

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) Currently, all primary containment isolation valves, except for the MSIV's, have 24 month testing intervals, as required by 10 CFR 50 Appendix J. Modifying the current testing interval for the MSIV's to conform with the Appendix J interval will not affect any previously evaluated accidents, since the testing will still be performed within the required guidelines for primary containment isolation valves. Previously evaluated accident do not address the leak rate testing intervals for primary containment isolation valves.

Therefore, this does not involve a significant increase in the probability or consequence of an accident previously evaluated.

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

All primary containment isolation valves, except for the MSIV's are leak rate tested at maximum intervals of 24 months in accordance with the Code of Federal Regulations. This interval is not viewed as causing a reduction in any margin of safety for the plant. Therefore, testing the MSIV's at this interval will not reduce any margin of safety.

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

Performing local leak rate tests on the MSIV's at a maximum interval of 24 months as specified in 10 CFR 50, Appendix J, will not create the possibility of a new or different kind of accident than any previously evaluated since the valves will continue to be tested at regular intervals similar to other primary containment isolation valves.

Therefore, the proposed amendment does not create the possibility of a new or different kind of accident than previously was evaluated.

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)(40).