



RS-00-54

July 31, 2000

U. S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, D.C. 20555-0001

Dresden Nuclear Power Station, Units 2 and 3  
Facility Operating License Nos. DPR-19 and DPR-25  
NRC Docket Nos. 50-237 and 50-249

LaSalle County Station, Units 1 and 2  
Facility Operating License Nos. NPF-11 and NPF-18  
NRC Docket Nos. 50-373 and 50-374

Subject: Response to Request for Additional Information

- References:
- (1) Letter from R. M. Krich (ComEd) to U. S. NRC Document Control Desk, "Request for Technical Specifications Changes for Dresden Nuclear Power Station, Units 2 and 3, LaSalle County Station, Units 1 and 2, and Quad Cities Nuclear Power Station, Units 1 and 2, to Convert to Improved Standard Technical Specifications," dated March 3, 2000.
  - (2) Letter from S. N. Bailey (U. S. NRC) to O. D. Kingsley, "Request for Additional Information," dated July 3, 2000.

Commonwealth Edison (ComEd) Company in a letter dated March 3, 2000, Reference 1, proposed changes to the Technical Specifications (TS) of Facility Operating License Nos. DPR-19, DPR-25, NPF-11, NPF-18, DPR-29, and DPR-30 for Dresden Nuclear Power Station, Units 2 and 3, LaSalle County Station, Units 1 and 2, and Quad Cities Nuclear Power Station, Units 1 and 2. The NRC subsequently issued a Request for Additional Information (RAI) letter

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in Reference 2. The RAI letter requested that additional information be provided concerning the Dresden Nuclear Power Station, Units 2 and 3, proposed Section 3.5, "Emergency Core Cooling Systems (ECCS) and Isolation Condenser (IC) System," and the LaSalle County Station, Units 1 and 2, proposed Section 3.5, "Emergency Core Cooling Systems (ECCS) and Reactor Core Isolation Cooling (RCIC) System;" of Reference 1 within 60 days after receipt of the letter (i.e., by September 4, 2000). The RAI letter did not request additional information be provided for Quad Cities Nuclear Power Station, Units 1 and 2. The RAI letter also requested that any necessary revisions to the Reference 1 submittal be made within 60 days of the submittal. The requested additional information is provided in the Attachment to this letter. The necessary changes to the Reference 1 submittal will be made after resolution of the issues in the RAI letter is achieved.

Should you have any questions concerning this letter, please contact Mr. J. V. Sipek at (630) 663-3741.

Respectfully,



R. M. Krich  
Vice President - Regulatory Services

Attachment: Response to Request for Additional Information

cc: Regional Administrator - NRC Region III  
NRC Senior Resident Inspector - Dresden Nuclear Power Station  
NRC Senior Resident Inspector - LaSalle County Station  
NRC Senior Resident Inspector - Quad Cities Nuclear Power Station  
Office of Nuclear Facility Safety - Illinois Department of Nuclear Safety

**ATTACHMENT**

**Response to Request for Additional Information**

REQUEST FOR ADDITIONAL INFORMATION  
IMPROVED TECHNICAL SPECIFICATIONS SECTION 3.5  
DRESDEN

**3.5.1 ECCS-Operating**

3.5.1-1        CTS 4.5 A.3.b  
                  DOC M.4  
                  ITS SR 3.5.1.7

The requirement for steam supply pressure to be  $\leq 180$  psig is proposed to be added to ITS. The CTS states this value to be "between 150 and 350 psig," and the DOC states that this is consistent with the requirement at Quad Cities.

**Comment:** Provide an explanation to show how this value is determined to be acceptable at Dresden. Describe the methodologies that were employed and the technical justification in the derivation of this value.

**Licensee Response:** The Current Technical Specifications (CTS) require High Pressure Coolant Injection (HPCI) to be operable in Modes 2 and 3 (i.e., Startup and Hot Shutdown, respectively) only when reactor steam dome pressure is  $> 150$  psig. CTS 4.5.A.3.b allows the low pressure flow test to be conducted with reactor steam dome pressure as high as 350 psig. This effectively allows entry into Modes 2 and 3 and allows reactor steam dome pressure to be increased to 350 psig prior to requiring the low pressure test to be performed. The change only modifies the highest reactor steam dome pressure at which the low pressure test is to be conducted. Thus, the change now ensures HPCI is operable prior to reactor steam dome pressure exceeding 180 psig. This will be the maximum pressure to which the plant is allowed to be pressurized prior to performing the HPCI low pressure flow test, and is based on ensuring adequate steam pressure and flow to perform the test. A test will be performed prior to implementation of the Improved Technical Specifications (ITS) to validate that adequate steam pressure and flow to perform the test can be obtained at 180 psig reactor steam dome pressure.

**3.5.2 ECCS-Shutdown**

3.5.2-1        CTS 3.5.B Action 2  
                  CTS 3.5.C Action 2  
                  DOC A.3  
                  ITS 3.5.2 Action D  
                  (Same question for LaSalle)

The DOC associated with this change should be categorized as a more restrictive change, "M."  
**Comment:** Change the categorization of DOC to "M."

**Licensee Response:** The categorization of this change has been approved by the NRC as an Administrative (i.e., "A") Discussion of Change (DOC) in the last two BWR/5 ITS conversions (i.e., WNP-2 and Nine Mile Point Unit 2 (NMP2)). Therefore, the change should remain categorized as an "A" DOC.

### 3.5.3 Isolation Condenser

3.5.3-1        CTS 4.5.D.1  
                 ITS SR 3.5.3.1

The ITS 3.5.3.1 modifies the STS by adding the following:

- a. Shellside water level  $\geq 6$  feet; and
- b. Shellside water temperature  $\geq 210$  °F.

The CTS states that "At least once per 24 hours by verifying the shell side water volume and the shell side water temperature to be within limits." The above numerical values are not found in the CTS, nor is there any DOC or JFD provided for this change.

**Comment:** Provide DOC and JFD for this change.

**Licensee Response:** A more restrictive DOC will be provided. A new Justification for Deviation (JFD) is not necessary, since the current JFD states that the change was made to be consistent with current requirements (i.e., the CTS require the level and temperature to be within limits).

REQUEST FOR ADDITIONAL INFORMATION  
IMPROVED TECHNICAL SPECIFICATIONS SECTION 3.5  
LASALLE

**3.5.2 ECCS-Shutdown**

3.5.2-1        CTS 3.5.2 Action b  
                 CTS 3.5.3 Action b  
                 DOC A.3  
                 ITS 3.5.2 Action D  
                 (Same question for Dresden)

The DOC associated with this change should be categorized as a more restrictive change, "M."  
**Comment:** Change the categorization of DOC to "M."

Note: The Safety Evaluation will discuss this item as a more restrictive change.

**Licensee Response:** The categorization of this change has been approved by the NRC as an "A" DOC in the last two BWR/5 ITS conversions (i.e., WNP-2 and NMP2). Therefore, the change should remain categorized as an "A" DOC.