

August 31, 2000

Mr. Oliver D. Kingsley, President
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Executive Towers West III
1400 Opus Place, Suite 500
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SUBJECT: DRESDEN, LASALLE, QUAD CITIES - REQUEST FOR ADDITIONAL
INFORMATION (TAC NOS. MA8382, MA8383, MA8390, MA8388, MA8378
AND MA8379)

Dear Mr. Kingsley:

By letter dated March 3, 2000, the Commonwealth Edison Company (ComEd) submitted an application to convert 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 the improved Standard Technical Specifications (iSTS). The staff requires additional information in order to complete its review of Section 3.4 of your application. Please respond to the enclosed request for additional information (RAI) and make any necessary revisions to the iSTS submittal within 60-days of receipt of this letter.

The staff forwarded you these questions as drafts on June 20, 2000, to allow discussion of the questions before the formal RAI was issued. The staff discussed the questions on June 27, 2000, and the results of that discussion are incorporated into the questions.

If you have any questions about this letter or about the staff's review of your submittal, please contact me at (301) 415-1321.

Sincerely,

/RA/

Stewart N. Bailey, Project Manager, Section 2
Project Directorate III
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket Nos. 50-237, 50-249, 50-373,
50-374, 50-254, 50-265

Enclosures: 1. Section 3.4 RAI for Dresden
2. Section 3.4 RAI for LaSalle
3. Section 3.4 RAI for Quad Cities

cc w/encls: See next page

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Dear Mr. Kingsley:

By letter dated March 3, 2000, the Commonwealth Edison Company (ComEd) submitted an application to convert 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 the improved Standard Technical Specifications (iSTS). The staff requires additional information in order to complete its review of Section 3.4 of your application. Please respond to the enclosed request for additional information (RAI) and make any necessary revisions to the iSTS submittal within 60-days of receipt of this letter.

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Enclosures: 1. Section 3.4 RAI for Dresden
2. Section 3.4 RAI for LaSalle
3. Section 3.4 RAI for Quad Cities

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- 2 -

Dresden, Units 2 and 3
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Request for Additional Information
Dresden Units 2 and 3 Application for Conversion to
NUREG-1433, Standard Technical Specifications
General Electric Plants (BWR/4)

ITS 3.4.1, Recirculation Loops Operating

3.4.1-01 ITS SR 3.4.1.1
 STS SR 3.4.1.1
 CTS 3.6.C
 DOC M.2

CTS 3.6.C requires that recirculation pump speed shall be maintained within 10% of each other with THERMAL POWER $\geq 80\%$ of RATED THERMAL POWER and within 15% of each other with THERMAL POWER $< 80\%$ of RATED THERMAL POWER. ITS SR 3.4.1.1 verifies loop flow mismatch with both recirculation loops in operation is $\leq 10\%$ of rated core flow when operating $< 70\%$ of rated flow and $\leq 5\%$ when operating at $\geq 70\%$ of rated flow. CTS utilized recirculation pump speed as the limited parameter whereas ITS uses loop jet pump flow. Also, CTS utilized THERMAL POWER where ITS is using rated core flow. DOC M.2 justified the numerical changes in the specification but did not justify the parameter changes. **Comment:** Provide additional information justifying the change in parameters.

ComEd Response:

3.4.1-02 ITS 3.4.1 Required Actions B and C
 CTS 3.6.C Action 1 and 2
 DOC L2, A6
 JFD 2

CTS 3.6.C Action requires that if recirculation pump speeds cannot be restored to within mismatch limits within 2 hours then trip one of the recirculation pumps and take required actions for single loop operation. ITS 3.4.1 Required Action B requires that if recirculation flow mismatch is not within limits within 2 hours then declare the recirculation loop with lower flow to be "not in operation." Following declaring the recirculation loop with the lower flow to be "not in operation" the single loop requirements of LCO 3.4.1 should be implemented. ITS 3.4.1 Required Action A should provide a 12 hour time limit to complete actions for single loop operation. However, ITS 3.4.1 Required Action C provides an exception if the LCO cannot be satisfied because of Condition A. Therefore, ITS does not contain a required time limit for completing single loop actions during loop mismatch conditions. **Comment:** Revise ITS to ensure that single loop actions are taken for loop mismatch conditions.

ComEd Response:

ITS 3.4.2, Jet Pumps No Comments

ITS 3.4.3, Safety/Relief Valves (S/RVs)

3.4.3-01 ITS SR 3.4.3.1
STS SR 3.4.3.1
CTS 3.6.E
DOC A5
JFD 2

CTS 3.6.E markup deleted the one safety valve at 1135 psig \pm 1%. STS SR 3.4.3.1 markup lists a safety function lift setpoint at 1135 \pm 11.3 psig. The typed version of ITS SR 3.4.3.1 did not contain the lift setpoint for a safety valve at 1135 psig. **Comment:** Clarify if the safety valve setpoint at 1135 psig is being retained or deleted.

ComEd Response:

3.4.3-02 Not Used

ITS 3.4.4, RCS Operational Leakage No Comments

ITS 3.4.5, RCS Leak Detection Instrumentation

3.4.5-01 Not Used

ITS 3.4.6, RCS Specific Activity No Comments

ITS 3.4.7, Shutdown Cooling (SDC) System – Hot Shutdown

3.4.7-01 Not Used

3.4.7-02 Not Used

3.4.7-03 ITS LCO 3.4.7, 3.4.7 Condition A, 3.4.7 Condition B
STS LCO 3.4.8, 3.4.8 Condition A, 3.4.8 Condition B

ITS 3.4.7 added the phrase “required” when the specification referred to SDC subsystems. No justification was provided for adding the phrase “required” to the specification. **Comment:** Provide a justification for adding “required” when referring to SDC subsystems.

ComEd Response:

ITS 3.4.8, Shutdown Cooling (SDC) System – Cold Shutdown

3.4.8-01 Not Used

3.4.8-02 ITS LCO 3.4.8, 3.4.8 Condition A
STS LCO 3.4.9, 3.4.9 Condition A

ITS 3.4.8 added the phrase “required” when the specification referred to SDC subsystems. No justification was provided for adding the phrase “required” to the specification. **Comment:** Provide a justification for adding the phrase “required” when referring to SDC subsystems.

ComEd Response:

ITS 3.4.9, RCS Pressure and Temperature (P/T) Limits

3.4.9-01 Not Used

3.4.9-02 Not Used

3.4.9-03 ITS 3.4.9 Required Action A.1
STS 3.4.9 Required Action A.1
CTS 3.6.K Action 1

CTS 3.6.K Action 1 requires restoring 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. ITS 3.4.9 Required Action A.1 requires restoring the parameter(s) to within limits within 30 minutes. The ITS did not explicitly retain the requirement which prohibits exceeding the heatup or cooldown rates during restoration of the parameters to within limits. **Comment:** Provide justification for not retaining the requirement to prohibit exceeding heatup and cooldown rates when restoring parameters to within limits.

ComEd Response:

ITS 3.4.10, Reactor Steam Dome Pressure No Comments

Request for Additional Information
LaSalle Units 1 and 2 Application for Conversion to
NUREG-1434, Standard Technical Specifications
General Electric Plants (BWR/6)

ITS 3.4.1, Recirculation Loops Operating

3.4.1-01 Not Used

3.4.1-02 Not Used

3.4.1-03 ITS 3.4.1 Required Action A.3 and Condition C
DOC LA2

ITS 3.4.1 Condition C requires exiting Region I of Figure 3.4.1-1 if one or two recirculation loops operating within Region I of Figure 3.4.1-1 OR Required Action A.3 and associated Completion Time not met. ITS 3.4.1. Required Action A.3 verifies recirculation loops are not operating in Region I of Figure 3.4.4-1 once per 12 hours. The second part of ITS 3.4.1 Condition C appears to be redundant. If ITS 3.4.1 Required Action A.3 could not be met because the unit was operating in Region I then the first part of ITS 3.4.1 Condition C would be adequate to initiate action to exit Region I. The most probable reason for ITS 3.4.1 Required Action A.3 not being met is because the verification could not be performed within the required Completion Time is an unavailability of indications. Without these indications completing ITS Required Action C.1 cannot be verified. A more appropriate action for not completing ITS Required Action A.3 due to not meeting the Completion Time is necessary. **Comment:** Provide additional information for including "Required Action A.3 and associated Completion Time not met" in ITS 3.4.1 Condition C.

ComEd Response:

3.4.1-04 Not Used

3.4.1-05 ITS LCO 3.4.1 and 3.4.1 Required Action F and G
ITS Bases 3.4.1 Actions
STS LCO 3.4.1 and 3.4.1 Required Action A
CTS 3.4.1.1 Action a.1 and 3.4.1.3 Action a and b
JFD 1

CTS 3.4.1.3 Action a and b declare the recirculation loop with the lower flow "not in operation" if mismatch conditions are not corrected within 2 hours. CTS 3.4.1.3 Action b directs CTS 3.4.1.1 actions be taken. CTS 3.4.1.1 Action a.1 requires single loop actions be performed within 4 hours. ITS 3.4.1 Required Action F requires declaring the recirculation loop with the lower flow to be "not in operation" if recirculation loop flow mismatch is not within limits. Following declaring the recirculation loop with the lower flow be "not in operation" the single loop conditions of the LCO should be implemented. ITS 3.4.1 Required Action A should provide a time limit of 12 hours to complete the actions for single loop operation. However, ITS 3.4.1

Required Action A provides an exception if the LCO cannot be satisfied because of Condition D. Therefore, ITS does not have a required time limit for completing single loop actions during loop mismatch conditions. **Comment:** Revise ITS to ensure that single loop actions are taken for loop mismatch conditions within a specific time period.

ComEd Response:

ITS 3.4.2, Flow Control Valves - No Comments

ITS 3.4.3, Jet Pumps - No Comments

ITS 3.4.4, Safety/Relief Valves (S/RVs)

3.4.4-01 CTS 3/4.4.2, DOC A.2
 CTS 4.4.2.2
 ITS 3.3.5.1, DOC L.5

Comment: The ITS proposes to delete the TS Channel Calibration requirement pertaining to Safety Relief Valve Low-Low Setpoint Relief instrumentation. DOC L.5 states that CTS 4.4.2.2 verifies, in part, that the low-low set function does not interfere with operability of the ADS. LSCS-UFSAR §5.2.2.4.1 specifies the Low-Low setpoint relief function consist of safety grade logic required to function during the decay-heat-dominant period late in an isolation transient. Additionally, the BWR STS retain the LLS instrumentation as LCO 3.3.6.3, based on this instrumentation meeting Criterion 3, of 10 CFR 50.36. Therefore, based on the design of the ADS instrumentation and Criterion 3 the staff requires the CTS Channel Calibration to be retained in ITS to ensure ADS operability is not rendered inoperable or degraded by the low low set instrumentation. Provide a low-low set SR for ADS instrumentation.

ComEd Response:

3.4.4-02 Not Used

3.4.4-03 ITS Bases 3.4.4 Applicable Safety Analysis
 STS Bases 3.4.4 Applicable Safety Analysis
 JFD 3

STS Bases 3.4.4 Applicable Safety Analysis states “for the purpose of the analyses, [six] of the S/RVs are assumed to operate in the relief mode, and seven in the safety mode. ITS Bases 3.4.4 Applicable Safety Analysis revised this to “for purpose of the analyses, ten of the S/RVs are assumed to operate in the safety mode.” Unit 1 and Unit 2 have a different number of S/RVs yet the same number of valves (10) were specified in the Bases as the assumed number to operate in the safety mode. **Comment:** Verify that and discuss why the same number of S/RVs are assumed to operate both on Unit 1 and Unit 2.

ComEd Response:

ITS 3.4.5, RCS Operational Leakage - No Comments

ITS 3.4.6, RCS Pressure Isolation Valve (PIV) Leakage - No Comments

ITS 3.4.7, RCS Leak Detection Instrumentation

- 3.4.7-01** ITS Bases 3.4.7 Actions B.1
STS Bases 3.4.7 Actions B.1 and B.2
JFD 1

ITS Bases 3.4.7 Actions B.1 specifies the 12 hour interval provides periodic information that is adequate to detect LEAKAGE. The STS Bases markup indicate this sentence was changed and designated by JFD 1. No change could be identified on the STS Bases markup.

Comment: Clarify if a change has been made.

ComEd Response:

ITS 3.4.8, RCS Specific Activity

- 3.4.8-01** CTS 3.4.5 Action c, Table 4.4.5-1 Item 4.b)
DOC A.2

CTS 3.4.5 Action c, and Table 4.4.5-1 Item 4.b) required performing sampling based on a specific change in reactor power or changes in off-gas levels. These requirements were not retained in the ITS. DOC A.2 indicated that these items were an administrative change. Not retaining the CTS requirements reduces the sampling requirements required by Technical Specifications. This is a less restrictive change. **Comment:** Revise DOC A.2 to not use term “delete” or provide documentation for a less restrictive change to Technical Specifications.

ComEd Response:

-
- 3.4.8-02** ITS 3.4.8 Required Action A.1 and B.1
STS 3.4.8 Required Action A.1 and B
CTS Table 4.4.5-1 Item 4

CTS Table 4.4.5-1, Item 4 requires performing an Isotopic Analysis for Iodine including I-131, I-133, and I-135. ITS 3.4.8 Required Action A.1 and B.1 require determining DOSE EQUIVALENT I-131. There is no discussion that Table 4.4.5-1 Item 4, (Isotopic Analysis for Iodine Including I-131, I-133, I-135), is equivalent to ITS Required Action A.1 and B.1 sampling requirements for DOSE EQUIVALENT I-131 specific activity or that sampling for DOSE EQUIVALENT I-131 specific activity satisfies the requirements of CTS Table 4.4.5-1 Item 4.

Comment: Provide applicable change documentation.

ComEd Response:

ITS 3.4.9, RHR Shutdown Cooling System – Hot Shutdown - No Comments

ITS 3.4.10, RHR Shutdown Cooling System – Cold Shutdown - No Comments

ITS 3.4.11, RCS Pressure and Temperature (P/T) Limits

3.4.11-01 ITS SR 3.4.11.6
STS SR 3.4.11.6
Unit 1 and Unit 2 CTS 4.4.6.1.4.a.2
JFD 1

Unit 1 CTS 4.4.6.1.4.a requires verifying reactor vessel flange and head flange temperature to be greater than or equal to 80 °F in OPERATIONAL CONDITION 4. CTS requires, when reactor coolant temperature is $\leq 85^{\circ}\text{F}$, the verification is required at least once per 30 minutes, however the CTS markup was changed to specify a reactor coolant temperature is $\leq 77^{\circ}\text{F}$. STS SR 3.4.11.6 Note markup indicates the RCS temperature as $\leq 85^{\circ}\text{F}$ for Unit 1. The typed ITS SR 3.4.11.6 Note specifies a temperature of $\leq 77^{\circ}\text{F}$ which is consistent with the Unit 1 CTS markup.

Unit 2 CTS 4.4.6.1.4.a requires verifying reactor vessel flange and head flange temperature to be greater than or equal to 86 °F in OPERATIONAL CONDITION 4. When reactor coolant temperature is $\leq 91^{\circ}\text{F}$ the verification is required at least once per 30 minutes. ITS SR 3.4.11.6 requires the verification be performed once per 30 minutes when Unit 2 RCS temperature is $\leq 77^{\circ}\text{F}$. The Unit 2 CTS was not marked-up to denote the difference in temperature. A DOC was not provided to explain the difference in temperatures. The typed ITS SR 3.4.11.6 Note uses $\leq 91^{\circ}\text{F}$ which is consistent with Unit 2 CTS 4.4.6.1.4.a.2.

The values in the ITS Bases SR 3.4.11.6 are consistent with the values in the typed ITS.

Comment: Verify the correct values are used in the ITS and correct the STS markup and provide proper discussion.

ComEd Response:

ITS 3.4.12, Reactor Steam Dome Pressure - No comments

Request for Additional Information
Quad Cities Units 1 and 2 Application for Conversion to
NUREG-1433, Standard Technical Specifications
General Electric Plants (BWR/4)

ITS 3.4.1, Recirculation Loops Operating

3.4.1-01 ITS SR 3.4.1.1
 STS SR 3.4.1.1
 CTS 3.6.C
 DOC M.1

CTS 3.6.C requires that recirculation pumps speed shall be maintained within 10% of each other with THERMAL POWER $\geq 80\%$ of RATED THERMAL POWER and within 15% of each other with THERMAL POWER $< 80\%$ of RATED THERMAL POWER. ITS SR 3.4.1.1 verifies loop flow mismatch with both recirculation loops in operation is $\leq 10\%$ of rated core flow when operating $< 70\%$ of rated flow and $\leq 5\%$ when operating at $\geq 70\%$ of rated flow. CTS utilized recirculation pump speed as the limited parameter whereas ITS uses loop jet pump flow. Also, CTS utilized THERMAL POWER where ITS is using rated core flow to determine which limit applies. DOC M.1 justified the numerical changes in the specification but did not justify the parameter changes. **Comment:** Provide additional information justifying the change in parameters.

ComEd Response:

3.4.1-02 ITS 3.4.1 Required Actions B and C
 CTS 3.6.C Action 1 and 2
 DOC L2, A6
 JFD 2

CTS 3.6.C Action 2 requires that if recirculation pump speeds cannot be restored to within mismatch limits within 2 hours then trip one of the recirculation pumps and take required actions for single loop operation. ITS 3.4.1 Required Action B requires that if recirculation flow mismatch is not within limits within 2 hours then declare the recirculation loop with lower flow to be "not in operation." Following declaring the recirculation loop with the lower flow to be "not in operation" the single loop requirements of LCO 3.4.1 should be implemented. ITS 3.4.1 Required Action A should provide a 12 hour time limit to complete actions for single loop operation. However, ITS 3.4.1 Required Action C provides an exception if the LCO cannot be satisfied because of Condition B, which requires action for loop mismatch conditions. Therefore, ITS does not contain a required time limit for completing single loop actions during loop mismatch conditions. **Comment:** Revise ITS to ensure that single loop actions are taken for loop mismatch conditions.

ComEd Response:

ITS 3.4.2, Jet Pumps

3.4.2-01 Not Used

ITS 3.4.3, Safety/Relief Valves (S/RVs)

3.4.3-01 Not Used

ITS 3.4.4, RCS Operational Leakage No Comments

ITS 3.4.5, RCS Leak Detection Instrumentation

3.4.5-01 ITS SR 3.4.5.1 and ITS Bases SR 3.4.5.1
STS SR 3.4.6.1
CTS 4.6.H.1
DOC A.2
JFD 3

CTS 4.6.H.1 requires sampling the primary containment atmospheric particulate radioactivity at least once per 12 hours. STS 3.4.6.1 requires performance of a CHANNEL CHECK of required primary containment atmospheric monitoring system. ITS SR 3.4.5.1 verifies primary containment atmospheric monitoring system operating. DOC A.2 states that Quad Cities continuously monitors primary containment atmosphere so the purpose of the SR is to verify the operation of the continuous monitoring system. The surveillance requirement should retain the requirement to perform a CHANNEL CHECK which is a defined term in STS and ITS.

Comment: Retain the defined terminology of STS or provide a plant specific design bases for not retaining the STS.

ComEd Response:

ITS 3.4.6, RCS Specific Activity No Comments

ITS 3.4.7, Residual Heat Removal (RHR) Shutdown Cooling System – Hot Shutdown

3.4.7-01 Not Used**3.4.7-02** Not Used

ITS 3.4.8, Residual Heat Removal (RHR) Shutdown Cooling System – Cold Shutdown

3.4.8-01 ITS 3.4.8 Required Action A.2

STS 3.4.9 Required Action B.1
CTS 3.6.P Action 2

CTS 3.6.P Action 2 requires with no OPERABLE RHR shutdown cooling subsystem, within 1 hour establish reactor coolant circulation with a recirculation pump or by an alternate method and monitor reactor coolant temperature and pressure at least once per hour. STS 3.4.9 Required Action B.1 requires verifying reactor coolant circulation by an alternate method with a Completion Time of 1 hour from discovery of no reactor coolant recirculation and once per 12 hours thereafter. ITS 3.4.8 Required Action A.2 requires verifying reactor coolant circulation by an alternate method with a Completion Time of 1 hour and once per 12 hours thereafter. A justification for deviating from the STS by deleting the phrase “from discovery of no reactor coolant circulation” was not provided. Also, the more restrictive requirement to verify the alternate reactor coolant circulation method “once per 12 hours thereafter” was not justified. **Comment:** Provide justification for deviating from the STS by deleting “from discovery of no reactor coolant circulation.”

ComEd Response:

ITS 3.4.9, RCS Pressure and Temperature (P/T) Limits

3.4.9-01 ITS 3.4.9
STS 3.4.10
CTS 3.6.K

CTS 3.6.K used “reactor vessel metal temperature” when referring to temperature limits throughout the LCO. STS 3.4.10 and ITS 3.4.9 use “RCS Temperature” for limits on parameters throughout the LCO. The values for reactor vessel metal temperature could vary from the RCS temperature during heatup and cooldown evolutions. The change in terminology was not justified.

CTS Figure 3.6.K-1 through 3.6.K-3 and ITS Figures 3.4.9-1 through 3.4.9-3 all use “Reactor Vessel Metal Temperature” for the x-axis label. The x-axis labels in ITS figures should match the terminology used in the LCO.

Comment: Provide justification for the change in terminology. Use consistent terminology between the LCO and the ITS figures.

3.4.9-03 ITS 3.4.9 Required Action A.1
STS 3.4.9 Required Action A.1
CTS 3.6.K Action 1

CTS 3.6.K Action 1 requires restoring 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. ITS 3.4.9 Required Action A.1 requires restoring the parameter(s) to within limits within 30 minutes. The ITS did not explicitly retain the requirement which prohibits exceeding the heatup or cooldown rates during restoration of the parameters to within limits. **Comment:** Provide justification for not retaining the requirement to prohibit exceeding heatup and cooldown rates when restoring parameters to within limits.

ComEd Response:

Start ITS 3.4.10, Reactor Steam Dome Pressure No Comments
