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RS-02-010

January 10, 2002

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

Quad Cities Nuclear Power Station, Units 1 and 2  
Facility Operating License Nos. DPR-29 and DPR-30  
NRC Docket Nos. 50-254 and 50-265

Subject: Additional Information Supporting Technical Specification Changes to Reactor Pressure Vessel Level Instrumentation Surveillance Frequencies and Allowable Values Requirements

Reference: Letter from Timothy J. Tulon, Exelon Generation Company (EGC), LLC, to U. S. NRC, "Request for Technical Specifications Changes to Modify Reactor Pressure Vessel Level Instrumentation Surveillance Frequencies and Allowable Values Requirements," dated August 13, 2001

In the above reference, Exelon Generation Company (EGC), LLC, submitted a Technical Specification amendment request for the Quad Cities Nuclear Power Station (QCNP), Units 1 and 2. The proposed change would modify certain surveillance frequencies and allowable values to reflect a planned upgrade to the reactor pressure vessel (RPV) water level instrumentation.

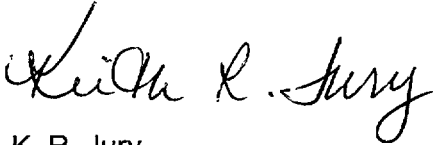
In a telephone conference call on January 3, 2002, Mr. D. L. Cecchetti (EGC) and Mr. M. Chawla (NRC) discussed a request for additional information regarding the proposed change. The attachment to this letter provides the requested information.

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If you have any questions concerning this letter, please contact D. L. Cecchetti at  
(630) 657-2826.

Respectfully,

A handwritten signature in black ink, appearing to read "K. R. Jury". The signature is fluid and cursive, with the first name "K" being particularly large and stylized.

K. R. Jury  
Director - Licensing  
Midwest Regional Operating Group

Attachments

Affidavit

Additional Information Supporting Technical Specification Changes to Reactor Pressure  
Vessel Level Instrumentation Surveillance Frequencies and Allowable Values  
Requirements

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


STATE OF ILLINOIS )  
COUNTY OF DUPAGE )  
IN THE MATTER OF )  
EXELON GENERATION COMPANY, LLC ) Docket Numbers

QUAD CITIES NUCLEAR POWER STATION, UNITS 1 AND 2 ) 50-254 AND 50-265

**SUBJECT: Additional Information Supporting Technical Specification  
Changes to Reactor Pressure Vessel Level Instrumentation  
Surveillance Frequencies and Allowable Values Requirements**

**AFFIDAVIT**

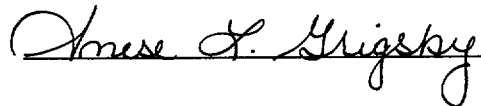
I affirm that the content of this transmittal is true and correct to the best of my knowledge, information and belief.

  
K. R. Jury  
Director - Licensing  
Midwest Regional Operating Group

Subscribed and sworn to before me, a Notary Public in and

for the State above named, this 10<sup>th</sup> day of

January, 2002.





## Attachment

### Additional Information Supporting Technical Specification Changes to Reactor Pressure Vessel Level Instrumentation Surveillance Frequencies and Allowable Values Requirements

#### Question:

Justify that the proposed functional test frequency for the analog trip units (Technical Specifications 3.3.2.2, 3.3.5.1, and 3.3.5.2) is consistent with previously approved evaluations for Quad Cities Nuclear Power Station (QCNPS).

#### Response:

The proposed functional test requirement implements recommendations resulting from evaluations performed by General Electric and the Boiling Water Reactor Owners' Group (BWROG) and that were subsequently approved by the NRC (i.e., improvements in instrumentation allowed outage times/surveillance test intervals - AOT/STI). QCNPS applied for the AOT/STI Technical Specifications enhancements in a License Amendment Request (LAR) dated December 27, 1999, which was subsequently approved by the NRC in a Safety Evaluation dated March 28, 2001. The LAR references a number of BWROG topical reports that support the AOT/STI Technical Specification enhancements. Certain topical reports are relevant to and support the subject Yarway Technical Specification change including: GENE-770-06-1-A (Technical Specification 3.3.2.2), NEDC-30936P-A (Technical Specification 3.3.5.1) and GENE-770-06-2 (Technical Specification 3.3.5.2) which evaluated the impact of extending functional testing requirements from monthly to quarterly. Also referenced was topical report NEDC-30851P-A (Reactor Protection System). Section 5.7.3 of NEDC-30851P-A includes a general discussion on the acceptability of extending testing requirements for analog trip unit devices. Note that the base model for these evaluations included sensor channels with transmitter/analog trip unit devices. For these reasons, the proposed functional test frequency is consistent with previously approved evaluations for QCNPS.