

June 16, 1995

U. S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, D.C. 20555



Subject: Dresden Nuclear Power Station Units 2 and 3  
Quad Cities Nuclear Power Station Units 1 and 2  
Response to NRC Staff Request for Additional Information (RAI)  
Regarding the Technical Specification Upgrade Program (TSUP)  
Section 3/4.8, "Plant Systems"  
NRC Docket Nos. 50-237/249 and 50-254/265

References: (a) J. Stang letter to D. Farrar, dated February 22, 1995.  
(b) P. Piet letter to T. Murley, dated September 10, 1993.

In Reference (a), the NRC staff requested additional information from Commonwealth Edison (ComEd) to support the review and approval of ComEd's TSUP project. Regarding TSUP Section 3/4.8, the NRC requested further evaluation by ComEd concerning the comparison of current requirements and the proposed TSUP requirements. ComEd submitted TSUP Section 3/4.8, "Plant Systems," to the NRC staff on September 10, 1993 (Reference (b)). The purpose of this letter is to respond to the NRC staff's RAI for TSUP Section 3/4.8 and supplement the information previously provided in the Reference (b) submittals. The information provided in this letter provides a comprehensive evaluation between current requirements against those proposed in TSUP and provides a discussion demonstrating the acceptability of any apparent deviations. Other portions of ComEd's response to the RAI regarding other Sections of TSUP will be forthcoming under separate cover.

Attachment A and B to this letter provides ComEd's response to NRC staff Generic Question No. 1 (supplemental significant hazards evaluation for TSUP 3/4.8) and Generic Question No. 2. Our response to Generic Question No. 2 includes supplemental information regarding proposed TSUP Section 3/4.8 as well as additional information regarding the comparison to current Technical Specification requirements. Attachment C provides ComEd's response to the NRC staff RAI regarding specific issues for TSUP 3/4.8.

In order to most effectively implement TSUP at Dresden Station, ComEd's goal is to complete implementation of TSUP at Dresden during October, 1995. The goal for implementation at Quad Cities is February 1996.

It should be noted that the proposed TSUP Section 3/4.8 requirements are consistent with and confirm the current safety analysis as described in the UFSAR. Any changes to the UFSAR necessitated by the approval and implementation of TSUP will be incorporated into the UFSAR, where applicable.

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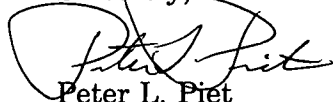
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In order to assist in the review of TSUP Section 3/4.8, Attachment D to this submittal contains marked-up copies of the current Dresden Unit 2 and Quad Cities Unit 2 Technical Specifications. The mark-ups consist of a cross-reference between current Technical Specification requirements against those proposed in TSUP 3/4.3. The mark-ups are not intended to replace or supersede the TSUP pages submitted to the NRC staff in Reference (b). As such, these pages have been stamped "For Information Only." In addition, Attachment E to this submittal contains marked-up copies of Section 3/4.7 of the BWR/4 STS, where applicable. These mark-ups serve as a cross-reference between STS and the proposed TSUP requirements. The mark-ups are not intended to replace or supersede the TSUP pages submitted to the NRC staff in References (b). As such, these pages have been stamped "For Information Only."

Per the requirements of Generic Letter (GL) 89-01, a copy of Dresden and Quad Cities' Offsite Dose Calculation Manual (ODCM) is provided as Attachment F. The ODCM is provided for the staff's information to identify the relocation of current Technical Specification requirements to the ODCM per the guidance of GL 89-01.

If there are any questions, please contact this office.

Sincerely,



Peter L. Piet

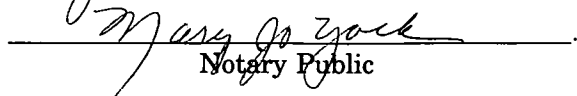
Nuclear Licensing Administrator

Attachments:

- A. ComEd Response to Generic Question No. 1
- B. ComEd Response to Generic Question No. 2
- C. ComEd Response to Questions on TSUP 3/4.8
- D. Marked-Up Current Technical Specification Pages
- E. Marked-Up BWR/4 STS Pages
- F. Chapter 12 of Dresden and Quad Cities ODCM/PCP

J. B. Martin, Regional Administrator - RIII  
J. F. Stang, Project Manager - NRR  
R. M. Pulsifer, Project Manager - NRR  
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Office of Nuclear Facility Safety - IDNS

Signed before me on this 16th day,  
of June, 1995.

  
Notary Public

