



Commonwealth Edison  
1400 Opus Place  
Downers Grove, Illinois 60515

February 26, 1993

Dr. Thomas E. Murley, Director  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Attn: Document Control Desk

Subject: Quad Cities Station Units 1 and 2  
Proposed Amendment to Facility Operating Licenses DPR-29  
and DPR-30, Appendix A, Technical Specifications  
NRC Docket Nos. 50-254 and 50-265

Reference: Generic Letter 91-09, "Modification of Surveillance  
Interval for the Electrical Protective Assemblies in  
Power Supplies for the Reactor Protection System."

Dear Dr. Murley:

Pursuant to 10 CFR 50.90, Commonwealth Edison Company (CECo) proposes to amend Appendix A, Technical Specifications, of Facility Operating Licenses DPR-29 and DPR-30. The proposed amendment requests the revision of the surveillance interval for the channel functional test of the Reactor Protection System Electrical Protective Assemblies (RPS-EPA units). The proposed change adopts the guidance of Generic Letter (GL) 91-09, "Modification of Surveillance interval for the Electrical Protective Assemblies in Power Supplies for the Reactor Protection System". The proposed change would eliminate the potential for inadvertent reactor trips caused by testing the RPS-EPA units during power operation.

This proposed amendment request is presented as follows:

1. Attachment 1 provides a description and safety analysis of the proposed changes in this amendment.
2. Attachment 2 provides a summary of the proposed changes.
3. Attachment 3 provides the marked-up Technical Specification pages with the requested changes indicated.
4. Attachment 4 describes CECo's evaluation performed in accordance with 10 CFR 50.92 (c), which confirms that no significant hazards consideration is involved.
5. Attachment 5 provides the Environmental Assessment of the proposed changes.

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February 26, 1993

This proposed amendment has been reviewed and approved by CECO On-Site and Off-Site Review in accordance with Commonwealth Edison procedures.

The RPS-EPA functional test surveillance for Quad Cities Station Units 1 and 2 are currently scheduled to be performed in June 1993 and July 1993, respectively. Commonwealth Edison requests NRC review and approval of this proposed amendment prior to the next scheduled performance of the surveillance. This schedule would eliminate potential reactor trips and challenges to safety systems associated with the performance of the surveillance during power operation.

To the best of my knowledge and belief, the statements contained above are true and correct. In some respect these statements are not based on my personal knowledge, but obtained information furnished by other Commonwealth Edison employees, contractor employees, and consultants. Such information has been reviewed in accordance with company practice, and I believe it to be reliable.

Commonwealth Edison is notifying the State of Illinois of this application for amendment by transmitting a copy of this letter and its attachments to the designated state official.

Please direct any questions or comments to me at (708) 515-7283.

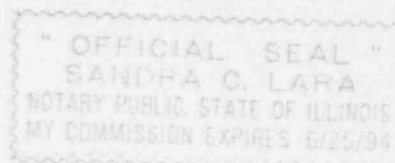
Sincerely,

John L. Schrije  
Nuclear Licensing Administrator

- Attachments:
1. Description and Safety Analysis of the Proposed Changes
  2. Summary of Proposed Changes-Quad Cities Station, DPR-29 and DPR-30
  3. Marked-Up Technical Specification Changes-Quad Cities Station, DPR-29 and DPR-30
  4. Evaluation of Significant Hazards Consideration
  5. Environmental Assessment

cc: A. Bert Davis, Regional Administrator-RIII  
C. Patel, Project Manager-NRR  
T. Taylor, Senior Resident Inspector-Quad Cities Station  
Office of Nuclear Safety-IDNS

State of Ill County of DeKalb  
Signed before me on this 26th day  
of February 19 93 by [Signature]  
Notary Public [Signature]



## ATTACHMENT 1

### Description and Safety Analysis of Proposed Changes to Appendix A Technical Specifications Facility Operating Licenses DPR-29 and DPR-30

#### A. Background

On January 7, 1993, during the performance of a channel functional test on the Reactor Protection System-Electrical Protection Assembly (RPS-EPA) units at Quad Cities Station Unit 2, the reactor scrambled from 100% power, and experienced Group II and III isolations. The cause of the scram was attributed, in part, to the performance of the RPS-EPA surveillance during power operation. This surveillance was being performed in accordance with the Technical Specification requirement for the Reactor Protection Bus Power Monitoring System.

To functionally test an RPS-EPA channel, power for the RPS from the associated RPS motor generator (MG) set must be transferred to the alternate power supply. This transfer of RPS power involves a dead-bus transfer, which causes a half scram when power is momentarily interrupted. Other examples of reactor trips related to RPS-EPA testing within the industry have been documented (reference J.A. Silady to T.E. Murley letter dated July 6, 1990).

In order to reduce the possibility of inadvertent reactor trips caused by testing the RPS-EPA units during power operation, a significant number of licensees have provided justification for a change from the BWR Standard Technical Specification (STS) guidance with respect to the channel functional test of the RPS-EPA units. In June 1991, the NRC issued Generic Letter (GL) 91-09, "MODIFICATION OF SURVEILLANCE INTERVAL FOR THE ELECTRICAL PROTECTIVE ASSEMBLIES IN POWER SUPPLIES FOR THE REACTOR PROTECTION SYSTEM". This document provided guidance for preparing a license amendment request to implement a line item Technical Specification (TS) improvement for the RPS-EPA channel functional test. The GL encouraged licensees to propose a TS change for BWR facilities consistent with the guidance in the GL.

#### B. Description and Bases for the Current Requirement

Technical Specification 4.9.F.1.a of Facility Operating Licenses DPR-29 and DPR-30 (Quad Cities Station Units 1 and 2) requires that the RPS Bus power monitoring system instrumentation (RPS-EPA units) are demonstrated OPERABLE at least once per 6 months by performing a channel functional test.

1. The RPS Bus power monitoring system instrumentation shall be determined OPERABLE:
  - a. At least once per 6 months by performing a channel functional test, and

Each RPS MG set is equipped with a pair of EPA units located between the MG set and the RPS Bus. The reserve power supply is also equipped with a pair of EPA units. These EPA units protect RPS equipment from abnormal operating voltage or frequency produced by the RPS MG sets or the reserve power supply. The EPA units will trip a breaker between the MG sets and the RPS upon over-voltage, under-voltage, or under-frequency conditions. The RPS-EPA units were installed in April 1983 on Unit 1, and November 1983 on Unit 2.

This channel functional test surveillance is based upon NRC and BWR-STS guidance for determining operability of the Reactor Protection Bus Power Monitoring System (reference BWR-STS 4.8.4.4; D. B. Vassallo to L. DelGeorge letter dated March 4, 1982; and, B. Ryback to H.R. Denton letter dated May 6, 1983).

### **C. Description of the Need for Changing the Current Requirement; Description and Bases of the Amended Requirement**

During the recent performance of the RPS-EPA channel functional test at Quad Cities Station Unit 2, the reactor experienced a scram from 100% power, and Group isolations. The cause of the scram was attributed, in part, to the performance of the RPS-EPA surveillance during power operation. This surveillance was being performed in accordance with the Technical Specification requirement for the Reactor Protection Bus Power Monitoring System.

In 1990, Dresden Nuclear Station provided bases and justification for a proposed Technical Specification amendment to change the channel functional test surveillance to state that the test shall be performed each time the plant is in cold shutdown, unless the test was performed in the previous 6 months. The bases for the proposed TS amendment stated that the proposed change would eliminate the potential for unnecessary reactor scrams due to performance of the surveillance during power operation.

Subsequent to the review and approval of Dresden Station Technical Specification amendments 111 and 107 (for DPR-19 and DPR-25), the NRC issued Generic Letter 91-09. This provided guidance to licensees for modification of the Technical Specifications in order to reduce the possibility for inadvertent reactor trips and challenges to safety systems due to performance of the RPS-EPA channel functional test during power operation. The GL also stated that the proposed modification to the Technical Specifications had been implemented with 9 of the last 14 BWR operating licenses. The proposed TS 4.9.F.1.a for DPR-29 and DPR-30 (Quad Cities Station Units 1 and 2) is consistent with the guidance of GL 91-09.

### **D. Schedule Requirements for the Proposed Technical Specification Amendment**

The RPS-EPA functional test surveillances for Quad Cities Station Units 1 and 2 are currently scheduled to be performed in June 1993 and July 1993, respectively. Commonwealth Edison requests NRC review and approval of this proposed amendment prior to the next scheduled performance of the surveillance in order to eliminate potential reactor trips and challenges to safety systems associated with performance of the surveillance during power operation.