



**Commonwealth Edison**  
1400 Opus Place  
Downers Grove, Illinois 60515

June 16, 1994

Mr. J. B. Martin  
Regional Administrator  
U. S. Nuclear Regulatory Commission  
Region III  
801 Warrenville Road  
Lisle, IL 60532-4351

Subject: Quad Cities Station Unit 2  
LaSalle County Station Unit 2  
Request for Regional Enforcement Discretion Regarding Facility  
Operating Licenses NPF-18, Appendix A, and DPR-30, Appendix A,  
NRC Docket Nos. 50-265 and 50-374

Dear Mr. Martin:

This letter documents the results of the teleconference held on June 15, 1994, between Commonwealth Edison (CECo) and the NRC Staff, in which Commonwealth Edison requested a Notice of Enforcement Discretion (NOED) from Technical Specification Surveillance Requirement 4.1.A for Quad Cities Station Unit 2 and from Technical Specification 4.0.3 for surveillance requirements 4.3.1.1 and 4.7.10.a for LaSalle County Station Unit 2.

Due to extremely low system reserve on the Commonwealth Edison Company (CECo) distribution system, CECo Bulk Power Operations office has requested that all Commonwealth Edison Generating Stations stop performing any testing that could jeopardize the ability of a unit to supply power to the distribution system. On June 15, 1994 at Quad Cities Station Unit 2, and June 16 and 17, 1994 at LaSalle County Station Unit 2, various high risk protective instrumentation surveillances will exceed the specified surveillance interval and the allowed factor of 1.25 times the surveillance interval.

CECo requested that the test intervals for these surveillances be extended to June 19, 1994 at 11:59 P.M. CST due to weather related high system load demand. A notice of enforcement discretion was verbally approved by Region III at 5:55 P.M. CST on June 15, 1994, for Quad Cities Station Unit 2 and LaSalle County Station Unit 2 to extend the test intervals for the applicable surveillances to June 19, 1994 at 11:59 P.M. CST.

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The basis of the request is provided in the Attachments (Attachment A describes the request for LaSalle County Station, and Attachment B describes the request for Quad Cities Station) and includes:

- The Technical Specification(s) that will be violated;
- The circumstances surrounding the condition, including the need for prompt action;
- The safety basis for the request that enforcement discretion be exercised, including an evaluation of the safety significance and potential consequences of the proposed course of action;
- Any proposed compensatory measure(s);
- The justification for the duration of the request;
- The basis for the conclusion that the request will not have a potential adverse impact on the public health and safety and that a significant safety hazard is not involved;
- The basis for the conclusion that the request will not involve adverse consequences to the environment.

With Quad Cities Station Unit 2 and LaSalle County Station Unit 2 in operating condition 1 (Run Mode), the surveillances will be performed as soon as the CEC system power supply conditions allow, but no later than 11:59 P.M. CST on June 19, 1994.

This request for Enforcement Discretion has been reviewed and approved by the LaSalle County On-Site Review Committee, in accordance with LaSalle County Station procedures.

This request for Enforcement Discretion has been reviewed and approved by the Quad Cities On-Site Review Committee, in accordance with Quad Cities Station procedures.

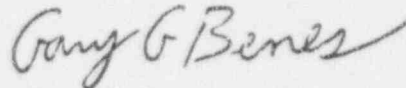
Mr. J. B. Martin

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June 16, 1994

CECo sincerely appreciates the NRC staff's effort and participation in the review of this request. Please direct any questions or comments to Gary Benes, Nuclear Licensing Administrator, at (708) 663-7282.

Very truly yours,



Gary G. Benes  
Nuclear Licensing Administrator

Attachment A: LaSalle County Station Request for Enforcement Discretion  
Attachment B: Quad Cities Station Request for Enforcement Discretion

cc: B. Clayton, Region III Branch Chief  
D. Hills, Senior Resident Inspector - LaSalle County Station  
A. T. Gody, Jr., Project Manager - NRR  
C. Miller, Senior Resident Inspector - Quad Cities Station  
C. P. Patel, Project Manager - NRR  
NRC Document Control Desk

## ATTACHMENT A

### **LASALLE COUNTY STATION REQUEST FOR ENFORCEMENT DISCRETION**

The original section 3, Evaluation of safety significance and consequences, as summarized during the June 15, 1994 CEC/NRC conference call, included the statement that "Current analysis provides for continued operation with the main turbine bypass system and End-of-cycle Recirculation Pump Trip (EOC-RPT) inoperable". This statement needs clarification. NEDC-31455, Extended Operating Domain and Equipment Out of Service For LaSalle County Nuclear Station analyzed the Load Rejection without Bypass transient with EOC-RPT inoperable. This means that if EOC-RPT is inoperable and the bypass valves fail to operate during a load rejection the MCPR limits will not be exceeded. The Tech spec 3.2.2 basis and plant procedures do not allow both systems to be inoperable at the same time, therefore unit operation cannot continue if both are inoperable. Unit 2 currently has EOC-RPT Operable. The paragraph also states that the valves are cycled weekly and normally pass the surveillance. The primary justification for minimal safety impact is that the turbine bypass system is not inoperable due to the surveillance interval extension.

The justification for the request for enforcement discretion as discussed by telecon at approximately 1730 on June 15, 1994 is as follows with the additions discussed during the conference call and minor corrections and clarifications. Also, section 3 is revised based on the above discussion on EOC-RPT.

#### **1. TECHNICAL SPECIFICATION OR LICENSING CONDITION THAT WILL BE VIOLATED**

At 6:25 P.M. CST on June 16, 1994, LaSalle County Station Unit 2 Technical Specification Surveillance Requirement 4.7.10.a., Main Turbine Bypass System, will exceed the specified weekly surveillance interval and the allowed factor of 1.25 times the surveillance interval.

At 1:00 A.M. CST on June 17, 1994, LaSalle County Station Unit 2 Technical Specification Surveillance Requirement 4.3.1.1, for monthly functional tests of four Reactor Protection System (RPS) Instrumentation "Functional Units" listed in Table 4.3.1.1-1, will exceed the specified weekly surveillance interval and the allowed factor of 1.25 times the surveillance interval. The reactor protection system instrumentation surveillances are for Average Power Range Monitors (APRM) items 2.a., Neutron Flux - High, Setdown; 2.b., Flow Biased Simulated Thermal Power - Upscale; 2.c., Fixed Neutron Flux - High; and 2.d., Inoperative.

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Per Specification 4.0.3, the associated Main Turbine Bypass System must be declared inoperable at 1825 hours (6:25 P.M. CST) on June 16, 1994; and the associated APRM instrumentation must be declared inoperable at 0100 hours (1:00 A.M. CST) on June 17, 1994.

4.0.3 Failure to perform a Surveillance Requirement within the allowed surveillance interval, defined by Specification 4.0.2, shall constitute noncompliance with the OPERABILITY requirements for a Limiting Condition for Operation. The time limits of the ACTION requirements are applicable at the time it is identified that a Surveillance Requirement has not been performed. The ACTION requirements may be delayed for up to 24 hours to permit the completion of the surveillance when the allowable outage time limits of the ACTION requirements are less than 24 hours. Surveillance Requirements do not have to be performed on inoperable equipment.

With the RPS trip functions inoperable, Technical Specification Limiting Condition for Operation 3.3.1 Action b. requires the following:

ACTION b. With the number of OPERABLE channels less than required by the Minimum OPERABLE Channels per Trip System requirement for both trip systems, place at least one trip system\*\* in the tripped condition within 1 hour and take the ACTION required by Table 3.3.1-1.

\*\* If more channels are inoperable in one trip system than in the other, select that trip system to place in the tripped condition, except when this would cause the Trip Function to occur.

Per Table 3.3.1-1, the Action required for the APRM Flow Biased Simulated Thermal Power-Upscale and Fixed Neutron Flux-High Reactor Protection System Instrument channels being inoperable is:

ACTION 4 - Be in at least STARTUP within 6 hours.

With the Main Turbine Bypass System Inoperable, and less than four bypass valves being capable of accepting steam flow per Surveillance 4.7.10.a., Limiting Condition for Operation 3.7.10 ACTION 2 requires:

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### LASALLE COUNTY STATION REQUEST FOR ENFORCEMENT DISCRETION

- a) Within 2 hours increase the MCPR LCO to the main turbine bypass inoperable value per Specification 3.2.3, and
- b) Within the next 12 hours restore the system to OPERABLE status.
- c) Otherwise, reduce THERMAL POWER to less than 25% of RATED THERMAL POWER within the next 4 hours.

Therefore, Commonwealth Edison requests Enforcement Discretion from Technical Specification 4.0.3 for Surveillance Requirement 4.7.10.a., Main Turbine Bypass System, cycling each turbine bypass valve through at least one full cycle of travel, and the functional testing of Technical Specification Surveillance Requirement 4.3.1.1, Reactor Protection System (RPS) Instrumentation "Functional Units" 2.a, 2.b, 2.c, and 2.d of Table 4.3.1.1-1, to extend the test intervals to 2359 hours on Sunday, June 19, 1994, to be able to restore the low Power Supply system reserve margin due to weather related high system load demand and severe summer weather.

## 2. CIRCUMSTANCES SURROUNDING THE SITUATION

Due to extremely low reserve on the Commonwealth Edison Co. (ComEd) distribution system, ComEd Bulk Power Operations has requested that all "High Risk" surveillances be curtailed at all of our generating stations. These "High Risk" surveillances have been defined as those surveillances which have a high probability of causing a reactor trip due to entering a "Half Scram" condition, or stroking operationally sensitive valves. Therefore, all testing of this nature should be curtailed until the system reliability is restored. It is estimated that this will occur by the weekend of June 18, 1994. In an effort to perform the surveillances in a controlled manner, the Enforcement Discretion should allow for staggered completion of these surveillances.



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LASALLE COUNTY STATION REQUEST FOR ENFORCEMENT DISCRETION

3. EVALUATION OF SAFETY SIGNIFICANCE AND CONSEQUENCES

The change involves in part the functional testing interval of APRM instrumentation in the RPS system. The instrumentation is fully operable and this testing only confirms that the components remain operable between calibration tests. By extending the testing interval, the potential for instrument failure is not increased; however, the ability to detect a failure is slightly delayed. Redundant channels exist to accommodate the low probability of a component failure. The components in RPS are "fail safe" such that some failure mechanisms are immediately detectable. Reactor Protection System Instrumentation functional tests were completed for the APRM's on June 8, 1994 at 0700 and the manual scram on June 12, 1994 at 0205, assuring that the scram channels are Operable. In any case the slight extension of the interval has minimal impact on safety.

The change to the surveillance interval for the cycling of each turbine bypass valve through at least one complete cycle of full travel is of minimal safety consequence. Current analysis provides for continued operation with the End-of-Cycle Recirculation Pump Trip (EOC-RPT) inoperable and assumes failure of the Main Turbine Bypass System. LaSalle Station procedures do not allow operation with both EOC-RPT and the Main Turbine Bypass System inoperable at the same time. Currently EOC-RPT is operable and this extension to the surveillance interval does not affect EOC-RPT operability. The turbine bypass valves are cycled weekly and normally pass the surveillance. Therefore, the extension of the interval has minimal impact on safety.

Therefore, the safety consequences of making specification 4.0.3 N/A with respect to these surveillances is minimal for the duration of this request, ending 2359 hours June 19, 1994.

4. COMPENSATORY ACTIONS

The following Compensatory Actions have been verified:

- 1) The last Unit 2 surveillances, testing the APRMs and the turbine bypass valves, were verified to be performed satisfactorily on June 8, 1994, beginning at 0700 hours and 0025 hours CST, respectively.
- 2) The previous five surveillance tests of the APRMs and turbine bypass valves were similarly verified to have been performed without operability concern.

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**LASALLE COUNTY STATION REQUEST FOR ENFORCEMENT DISCRETION**

- 3) Operators are trained to maintain vigilance with regard to operability of instrumentation indicating reactor status. However, because of the current situation, operators will be instructed to maintain a heightened level of awareness to APRM instrumentation indication and response; and be especially sensitive to potential indications of instrument inoperability.

5. **JUSTIFICATION FOR THE DURATION OF THE REQUEST:**

The present heat wave is expected to result in high demand for energy until the weekend. A period for performance of the surveillances is needed in addition to this time. We therefore request that the Enforcement Discretion extend until 2359 hours on Sunday, June 19, 1994. In addition to the time needed for staggering the performance of these surveillances, the following items provide justification for the duration of this request:

- The load prediction indicates that the load demand will reduce to acceptable levels by Friday evening.
- There is no expected additional generation between these dates which would significantly reduce the need for this Enforcement Discretion.
- Major system loads have already been curtailed.
- System voltages on the ComEd system have already been dropped 2.5%.
- The loss of one of our major generating units could result in a major, precipitous loss of energy to many areas. The magnitude of this loss is difficult to predict, however, it is safe to say that it would have a major impact on the safety of many individuals and industry.

6. **EVALUATION OF SIGNIFICANT HAZARDS CONSIDERATION**

Commonwealth Edison has evaluated the proposed request for Enforcement Discretion and determined that it does not represent a significant hazards consideration. Based on the criteria for defining a significant hazards consideration established in 10 CFR 50.92, operation of LaSalle County Station Unit 2 in accordance with the proposed request will not:



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LASALLE COUNTY STATION REQUEST FOR ENFORCEMENT DISCRETION

- 1) Involve a significant increase in the probability or consequences of an accident previously evaluated because:

The proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated. The proposed changes increase the surveillance test interval (STI) for RPS instrumentation. There are no changes to the systems themselves. Because of this, there is no change in the probability of an occurrence of an accident or the consequences of an accident or the consequence of a malfunction of equipment. With respect to the malfunction of equipment, topical reports (References 1 and 2) prepared by GE demonstrated that there is a reduction in scram frequency for the RPS. Part of this basis included increasing the frequency of the Manual Scram Reactor Protection System Instrumentation channel functional test from monthly to weekly. The NRC has concurred with this conclusion in its review of the topical reports. LaSalle currently performs the Manual Scram functional tests on a weekly basis, last performed on June 12, 1994, verifying the Reactor Protection System channels are Operable. The proposed changes are consistent with the safety evaluation reports issued in these topical reports.

The turbine bypass valves have been verified to operate at the last normal surveillance and based on performance history, will remain operable for the duration of this request without cycling the valves until June 19, 1994.

The proposed changes therefore do not involve a significant increase in the probability or consequences of an accident previously evaluated.

- 2) Create the possibility of a new or different kind of accident from any accident previously evaluated because:

The proposed changes do not create the possibility for an accident or malfunction of a different type than any evaluated previously in the UFSAR. The proposed changes increase the STI for RPS instrumentation functional tests and the cycling of the turbine bypass valves. There are no changes to the systems. Since there are no system changes there is no possibility of a different accident or malfunction type than any previously evaluated.

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**LASALLE COUNTY STATION REQUEST FOR ENFORCEMENT DISCRETION**

- 3) Involve a significant reduction in the margin of safety because:

The proposed changes do not reduce the margin of safety as defined in the basis for any Technical Specification. The proposed changes do not change any setpoints in the RPS system or the levels of redundancy. Setpoints are based on drift occurring between specified calibration intervals and not on functional test frequencies. The bases either do not discuss the STI or state "... one channel may be inoperable for brief intervals to conduct required surveillance." The change in functional test frequency does not affect this basis. Based on the analysis prepared by GE and approved by the NRC, which examined the effects of extending the STI, a significant reduction in the margin of safety does not exist.

The change related to the turbine bypass valve surveillance interval based on 4.0.3 being N/A for the duration of this request is based on the good performance history within at least the past year indicating the valves will pass the required surveillance when it is performed prior to the expiration of the requested enforcement discretion. Also, an analysis has been performed bounding inoperability of the Main Turbine Bypass System should it not pass the required surveillance. Therefore, there is minimal or no reduction in the margin of safety.

Guidance has been provided in "Final Procedures and Standards on No Significant Hazards Considerations," Final Rule, 51 FR 7744, for the application of standards to license change requests for determination of the existence of significant hazards considerations. This document provides examples of amendments which are and are not considered likely to involve significant hazards considerations. This request for enforcement discretion most closely fits the example of a change which may either result in some increase to the probability or consequences of a previously analyzed accident or may reduce in some way a safety margin, but where the results of the change are clearly within all acceptable criteria with respect to the system or component specified in the applicable Standard Review Plan.

This request for enforcement discretion does not involve a significant relaxation of the criteria used to establish safety limits, a significant relaxation of the bases for the limiting safety system settings or a significant relaxation of the bases for the limiting conditions for operations. Therefore, based on the guidance provided in the Federal Register and the criteria established in 10 CFR 50.92(c), the proposed change does not constitute a significant hazards consideration.

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7. ENVIRONMENTAL ASSESSMENT

LaSalle County Station has evaluated the proposed enforcement discretion against the criteria for identification of licensing and regulatory actions requiring environmental assessment in accordance with 10 CFR 51.20. It has been determined that the proposed changes meet the criteria for a categorical exclusion as provided under 10 CFR 51.22(c)(9). This conclusion has been determined because the changes requested do not pose significant hazards considerations or do not involve a significant increase in the amounts, and no significant changes in the types, of any effluents that may be released off-site. Additionally, this request does not involve a significant increase in individual or cumulative occupational radiation exposure.

8. APPROVAL BY ON-SITE REVIEW

The request has been approved by LaSalle County Senior Station Management and On-Site Review (OSR) in accordance with Station procedures.

REFERENCES

- A. General Electric Topical Report. "Technical Specification Improvement Analysis for the Reactor Protection System," NEDC-30851P-A, DRF A00-02119-A, March 1988.
- B. General Electric Topical Report, "Technical Specification Improvement Analysis for the Reactor Protection System for LaSalle County Station, Units 1 and 2," MDE-83-0485 Rev. 3, DRF C71-00072-1, April 1991.

## ATTACHMENT B

### QUAD CITIES STATION REQUEST FOR ENFORCEMENT DISCRETION

#### 1. TECHNICAL SPECIFICATION OR LICENSING CONDITION THAT WILL BE VIOLATED

At 0000 hours, CST, on June 16, 1994, the weekly functional tests for the APRM Reactor Protection System (RPS) trips and the Main Steam Line (MSL) Radiation Monitor RPS trips listed in Quad Cities Station Unit 2 Technical Specification Surveillance Requirement Table 4.1-1 will exceed the specified surveillance interval and the allowed factor of 1.25 times the surveillance interval. These RPS instrumentation surveillances cause multiple half-scrams, and, in the case of the MSL Radiation Monitor, also multiple half-trips of the primary containment isolation. During this testing, a single equipment failure or error could cause a full reactor scram.

Technical Specification 3.1.A under Reactor Protection System reads as follows:

The setpoints, minimum number of trip systems, and minimum number of instrument channels that must be operable for each position of the reactor mode switch shall be as given in Tables 3.1-1 through 3.1-4. The system response times from the opening of the sensor contact up to and including the opening of the trip actuator contacts shall not exceed 50 milliseconds.

Technical Specification 4.1.A under Reactor Protection System reads as follows:

Instrumentation systems shall be functionally tested and calibrated as indicated in Table 4.1-1 and 4.1-2 respectively.

Technical Specification Table 3.1-3, Reactor Protection System (SCRAM) Instrumentation Requirements Run Mode, lists the following instruments and required actions, among others:

APRM (high flux, inoperative, and downscale), action A or B of note 2

Main Steamline high radiation, action A or C of note 2

Technical Specification Table 4.1-1, Scram Instrumentation and Logic Systems Functional Tests, lists the following instruments and functional test frequencies, among others:

APRM (high flux, inoperative and downscale), once per week.

Main steamline high radiation, once per week.

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**QUAD CITIES STATION REQUEST FOR ENFORCEMENT DISCRETION**

With these functions inoperable, Technical Specification Table 3.1-3, note 2, requires the following:

If the first column cannot be met for one of the trip systems, that trip system shall be tripped. If the first column cannot be met for both trip systems, the appropriate actions listed below shall be taken:

- A. Initiate insertion of operable rods and complete insertion of all operable rods within 4 hours.
- B. Reduce power level to IRM range and place mode switch in the Startup/Hot Standby position within 8 hours.
- C. Reduce turbine load and close main steamline isolation valves within 8 hours.

As noted on Table 3.1-3, for the APRM trips, either option A or B may be taken, and for the Main Steam Line Radiation Monitor trips, either option A or C may be taken.

Therefore, Commonwealth Edison requests Enforcement Discretion from Technical Specification 4.1.A for the aforementioned instruments for 96 hours (until 2359 hours on June 19, 1994) to be able to restore the low Power Supply system reserve margin due to weather related high system load and severe summer weather.

2. **CIRCUMSTANCES SURROUNDING THE SITUATION**

Due to extremely low reserve on the Commonwealth Edison Co. (ComEd) distribution system, ComEd Bulk Power Operations has requested that all "High Risk" surveillances be curtailed at all of our generating stations. These "High Risk" surveillances have been defined as those surveillances which have a high probability of causing a reactor trip due to entering a "Half Scram" condition, or stroking operationally sensitive valves. Therefore, all testing of this nature should be curtailed until the system reliability is restored. It is estimated that this will occur by the weekend of June 18, 1994. In an effort to perform the surveillances in a controlled manner, the Enforcement Discretion should allow for staggered completion of these surveillances.

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### QUAD CITIES STATION REQUEST FOR ENFORCEMENT DISCRETION

#### 3. EVALUATION OF SAFETY SIGNIFICANCE AND CONSEQUENCES

The change involves the functional testing interval of instrumentation in the RPS system. The instrumentation is fully operable and this testing only confirms that the components remain operable between calibration tests. By extending the testing interval, the potential for instrument failure is not increased; however, the ability to detect a failure is slightly delayed. Redundant channels exist to accommodate the low probability of a component failure. The components in RPS are "fail safe" such that some failure mechanisms are immediately detectable. Reactor Protection System Instrumentation functional tests were completed for the APRM's and the MSL Radiation Monitors on June 7, 1994 during the afternoon shift, and for the manual scram on April 1, 1994, assuring that the scram channels are operable. In any case the slight extension of the interval has minimal impact on safety.

Therefore, the safety consequences of deferring the surveillances on these instruments is minimal for the duration of this request, ending 2359 hours June 19, 1994.

#### 4. COMPENSATORY ACTIONS

The following Compensatory Action has been verified:

- 1) The last four Unit 2 surveillances testing the APRMs and the MSL Radiation Monitors were verified to be performed satisfactorily, with the most recent being on June 7, 1994, during the afternoon shift.
- 2) Operators are trained to maintain vigilance with regard to operability of instrumentation indicating reactor status. However, because of the current situation, operators will be instructed to maintain a heightened level of awareness to APRM and MSL Radiation Monitor instrumentation indication and response; and be especially sensitive to potential indications of instrument inoperability.

#### 5. JUSTIFICATION FOR THE DURATION OF THE REQUEST:

The present heat wave is expected to result in high demand for energy until the weekend. A period for performance of the surveillances is needed in addition to this time. We therefore request that the Enforcement Discretion extend until 2359 hours on Sunday, June 19, 1994.



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The load prediction indicates that the load demand will reduce to acceptable levels by Friday evening.

There is no expected additional generation between these dates which would significantly reduce the need for this Enforcement Discretion.

Major system loads have already been curtailed.

System voltages on the ComEd system have already been dropped 2.5%.

The loss of one of our major generating units could result in a major, precipitous loss of energy to many areas. The magnitude of this loss is difficult to predict, however, it is safe to say that it would have a major impact on the safety of many individuals and industry.

6. **EVALUATION OF SIGNIFICANT HAZARDS CONSIDERATION**

Commonwealth Edison has evaluated the proposed request for Enforcement Discretion and determined that it does not represent a significant hazards consideration. Based on the criteria for defining a significant hazards consideration established in 10 CFR 50.92, operation of Quad Cities Station Unit 2 in accordance with the proposed request will not:

- 1) Involve a significant increase in the probability or consequences of an accident previously evaluated because:

The proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated. The proposed changes increase the surveillance test interval (STI) for RPS instrumentation. There are no changes to the systems themselves. Because of this, there is no change in the probability of an occurrence of an accident, of the consequences of an accident, or the consequence of a malfunction of equipment.

The proposed changes therefore do not involve a significant increase in the probability or consequences of an accident previously evaluated.

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- 2) Create the possibility of a new or different kind of accident from any accident previously evaluated because:

The proposed changes do not create the possibility for an accident or malfunction of a different type than any evaluated previously in the UFSAR. The proposed changes increase the STI for RPS instrumentation functional tests. There are no changes to the systems. Since there are no system changes there is no possibility of a different accident or malfunction type than any previously evaluated.

- 3) Involve a significant reduction in the margin of safety because:

The proposed changes do not significantly reduce the margin of safety as defined in the basis for any Technical Specification. The proposed changes do not change any setpoints in the RPS system or the levels of redundancy. Setpoints are based on drift occurring between specified calibration intervals and not on functional test frequencies. Quad Cities functional test frequencies for these instruments are based on reference (1). As stated in the bases, "Considering the 2-hour monitoring interval for the analog devices as assumed above and a weekly test interval for the bistable trip circuits, the design reliability goal of 0.99999 is attained with ample margin." The 2-hour monitoring interval refers to the time it is assumed to take an operator to notice an un-safe failure, i.e., one that does not alarm or result in a trip. In light of the ample margin referred to in the bases, and considering the compensatory action of heightening the operator's awareness of the status of these instruments, the proposed changes do not significantly reduce the margin of safety as defined in the basis for any Technical Specification.

Guidance has been provided in "Final Procedures and Standards on No Significant Hazards Considerations," Final Rule, 51 FR 7744, for the application of standards to license change requests for determination of the existence of significant hazards considerations. This document provides examples of amendments which are and are not considered likely to involve significant hazards considerations. This request for enforcement discretion most closely fits the example of a change which may either result in some increase to the probability or consequences of a previously analyzed accident or may reduce in some way a safety margin, but where the results of the change are clearly within all acceptable criteria with respect to the system or component specified in the applicable Standard Review Plan.

**ATTACHMENT B**  
**QUAD CITIES STATION REQUEST FOR ENFORCEMENT DISCRETION**

This request for enforcement discretion does not involve a significant relaxation of the criteria used to establish safety limits, a significant relaxation of the bases for the limiting safety system settings or a significant relaxation of the bases for the limiting conditions for operations. Therefore, based on the guidance provided in the Federal Register and the criteria established in 10 CFR 50.92(c), the proposed change does not constitute a significant hazards consideration.

7. **ENVIRONMENTAL ASSESSMENT**

Quad Cities Station has evaluated the proposed enforcement discretion against the criteria for identification of licensing and regulatory actions requiring environmental assessment in accordance with 10 CFR 51.20. It has been determined that the proposed changes meet the criteria for a categorical exclusion as provided under 10 CFR 51.22(c)(9). This conclusion has been determined because the changes requested do not pose significant hazards considerations or do not involve a significant increase in the amounts, and no significant changes in the types, of any effluents that may be released off-site. Additionally, this request does not involve a significant increase in individual or cumulative occupational radiation exposure.

8. **APPROVAL BY ON-SITE REVIEW**

The request has been approved by Quad Cities Senior Station Management and On-Site Review (OSR) in accordance with Station procedures.

**REFERENCES**

- (1) I.M. Jacobs, "Reliability of Engineered Safety Features as a Function of Testing Frequency," Nuclear Safety, Vol. 9, No. 3, pp. 310-312, July-August, 1968.