



Commonwealth Edison
1400 Opus Place
Downers Grove, Illinois 60515

October 11, 1991

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
Application for Amendment to
Facility Operating Licenses DPR-29 and DPR-30,
Appendix A, Technical Specifications
NRC Docket Nos. 50-254 and 50-265

Reference: Sections 6.11 and 6.12 of the
Standard Technical Specifications.

Dear Dr. Murley,

Pursuant to 10 CFR 50.90, Commonwealth Edison (CECo) proposes to amend Appendix A, Technical Specifications, of Facility Operating Licenses DPR-29 and DPR-30. The proposed amendment requests the following changes to the technical specifications: 1) In Section 6.1.G, the position title Assistant Vice President (AVP) Quality Programs and Assessment has been revised to General Manager (GM) Quality Programs and Assessment to reflect the current CECo Management organization nomenclature; 2) In Section 6.1.G.1.b, the General Manager (GM) Quality Programs and Assessment has been given authority to delegate the approval of audit agenda and checklists, and the findings and the report of each audit; 3) Section 6.2.B (Radiation Protection Procedure) has been deleted and replaced with new section 6.11 (Radiation Protection Program); 4) Sections 6.11 and 6.12 have been added to include sections defining a Radiation Protection Program and the requirements of a High Radiation Area, respectively; and, 5) The Table of Contents has been changed to reflect the two new pages (6.11-1 and 6.12-2).

This proposed amendment request is subdivided as follows:

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

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Ltr. Encl.

October 11, 1991

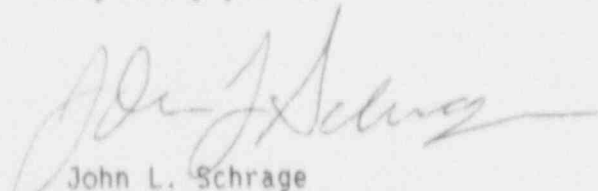
This proposed amendment has been reviewed and approved by CECO On-Site and Off-Site Review in accordance with Commonwealth Edison procedures.

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 you may have concerning this submittal to this office.

Very truly yours,



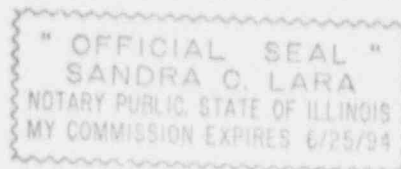
John L. Schrage
Nuclear Licensing Administrator

Attachments:

- A. Description of Safety Analysis of the Proposed Changes
- B. Marked-Up Technical Specification Pages
- C. Evaluation of Significant Hazards Considerations
- D. Environmental Assessment

cc: A. Bert Davis, Regional Administrator - RIII
T.E. Taylor, Senior Resident Inspector - Quad Cities
L. Olshan, Project Manager - NRR
Office of Nuclear Facility Safety - IDNS

Signed before me on this 11th day
of October, 1991,
by [Signature]
Notary Public



ATTACHMENT A

DESCRIPTION AND SAFETY ANALYSIS OF PROPOSED CHANGES TO APPENDIX A, TECHNICAL SPECIFICATIONS OF FACILITY OPERATING LICENSES DPR-29 AND DPR-30

A. Position Title Change (Section 6.1.G)

Description of the Proposed Change

Section 6.1.G of the Technical Specifications currently includes the position title Assistant Vice President (AVP) Quality Programs and Assessment. This position title has been modified at CECO to General Manager (GM) Quality Programs and Assessment. This change is administrative in nature and does not affect the responsibilities of the GM Quality Programs and Assessment. Pages 6.1-3, 6.1-4, 6.1-5, 6.1-6, 6.1-9, 6.1-10 of the current Technical Specifications are affected by the above change.

Justification and Evaluation of the Proposed Change

The scope and responsibilities of the position GM Quality Programs and Assessment are unaffected by this change. Therefore, because this change is administrative in nature and has no impact on plant safety or systems as described in the Updated Final Safety Analysis Report, the previous safety analyses and assumptions in the UFSAR remain bounding.

B. Revision of Approval Authority (Section 6.1.G.1.b)

Description of the Proposed Change

In Section 6.1.G.1.b of the Technical Specifications, the Nuclear Quality Programs Manager currently has authority to approve audit agenda and checklists, the findings and the report of each audit. The proposed modification to this section of the Technical Specifications allows delegation of this approval authority by the General Manager (GM) Quality Programs and Assessment. As stated in this section of the Technical Specifications, the GM Quality Programs and Assessment currently has responsibility for the station audit function. Page 6.1-4 (DPR-29) and Page 6.1-5 (DPR-30) of the current Technical Specifications are affected by the above changes.

Justification and Evaluation of the Proposed Change

The proposed Technical Specification allows greater flexibility and improved time schedules while retaining the overall responsibility for the station audit function with the GM Quality Programs and Assessment. Therefore, because this change is administrative in nature and has no impact on plant safety or systems as described in the Updated Final Safety Analysis Report, the previous safety analyses and assumptions in the UFSAR remain bounding.

C. Addition of the Radiation Protection Program and High Radiation Area (Sections 6.11 and 6.12)

Description of the Proposed Change

The current requirements for control of high radiation areas are governed by 10 CFR 20.203(c). This requirement states:

"Each entrance or access point to a high radiation area shall be maintained locked except during periods when access to the area is required, with positive control over each individual entry."

Quad Cities Station currently complies with this regulation by requiring all areas greater than 100 mrem per hour to be locked, except during periods of access, or by providing direct surveillance to prevent unauthorized entry.

The requested revision would provide an alternate method of controlling unauthorized entry into high radiation areas, in lieu of the requirements of 10 CFR 20.203(c)(2) and (4). In addition, the requested revision would replace the existing Section 6.2.B (Radiation Protection Procedures) with Section 6.11 (Radiation Protection Program). These two changes affect page 6.2-2 of the current Technical Specifications, and adds three new pages (6.11-1, 6.12-1, and 6.12-2).

The requested change deletes section 6.2.B (Radiation Protection Procedures) and replaces it with Section 6.11 (Radiation Protection Program). This new section is consistent with Section 6.11 of the Standard Technical Specifications, as well as the existing Section 6.2.B. As such, this proposed change is administrative in nature.

The requested change also adds Section 6.12 to the Technical Specifications. This section would remove the current requirement for locking high radiation areas equal to or greater than 100 mrem per hour as measured at 30 centimeters (cm) from the radiation source. In lieu of locking these areas or providing a control device and alarm signal as required by 10 CFR 20.203(c)(2)(ii) and (iii), each high radiation area in which the intensity of radiation is greater than 100 mrem per hour but less than 1000 mrem per hour shall be barricaded and conspicuously posted. Entrance to these areas shall be controlled by requiring the issuance of a Radiation Work Permit (RWP). The new section would also require that any individual or group of individuals entering such areas would be provided with or accompanied by one or more of the following:

- A radiation monitoring device which continuously indicates the radiation dose rate in the area;
- A radiation monitoring device which continuously integrates the radiation dose rate in the area and alarms when a preset integrated dose is received. Entry into such areas with this monitoring device may be made after the dose rate levels in the area have been established and personnel have been informed of these levels;

- A health physics qualified individual (i.e., qualified in radiation protection procedures) with a radiation dose rate monitoring device will be responsible for providing positive control over activities within the area and performing periodic radiation surveillances at the frequency specified by Health Physics in the RWP.

The proposed changes also provide additional requirements for areas accessible to personnel with radiation levels greater than 1000 mrem per hour as measured at 30 cm. (11.8 inches). For areas with radiation levels greater than 1000 mrem per hour, the following requirements will be added:

- Doors will remain locked except during periods of access by personnel under an approved RWP, which shall specify the dose rate in the immediate work areas and the maximum allowable stay time for individuals in the area. In lieu of the stay time specification, direct or remote continuous surveillance may be performed by qualified radiation protection personnel.

Where no enclosure exists for purpose of locking large areas, and where no enclosure can be reasonably constructed around the area, those areas shall be roped off, conspicuously posted and a flashing light shall be activated as a warning device.

Justification and Evaluation of the Proposed Change

The purpose of these Technical Specification changes is to allow an alternative method of controlling access to high radiation areas in lieu of methods specified by 10 CFR 20.203(c)(2) and (4). Pursuant to 10 CFR 20.203(c)(5), licensees may apply to the Commission for approval of alternative methods of controlling access to high radiation areas as long as such methods demonstrate that unauthorized entries into high radiation areas will be prevented.

The wording of the proposed changes is adopted from the Standard Technical Specifications (STS). The differences between the proposed sections and the STS are listed below:

- The Standard Technical Specifications require the dose rate measurement to be taken at 18 inches (45 cm.). Although the current version of 10 CFR 20 does not list a distance requirement, the revised version implementation date of January 1, 1993 will list 30 cm. as the required distance for the dose rate measurement. Therefore, it is prudent to modify the Technical Specifications to meet the 30 cm. requirement.
- In Section 6.12.c of the Standard Technical Specifications, the title "Health Physicist" is utilized. Quad Cities Station uses the title "Health Physicist" for degreed personnel. The comparable function at Quad Cities is "Health Physics."

In 1988, the Commission issued NRC Information Notice No. 88-79 ("Misuse of Flashing Lights for High Radiation Area Controls"). This Information Notice discussed an apparent lack of understanding of the technical specification requirements for HRA access control on the part of workers and supervisors. This lack of understanding led to five high radiation area access control events.

The Information Notice also stated: "NRC recognized that requiring power reactor licensees to lock all areas that exceeded 100 mrem per hour was not appropriate because of the large number of such areas, as well as the general state of sophistication of the typical radiation protection program (which includes RWP controls, surveillance programs, comprehensive worker training, and professional technical HP staff among others)". The NRC has approved TS amendments for some power reactor licensees allowing them to lock only areas with dose rates of 1000 mrem per hour or greater, provided that additional specified controls were implemented.

Quad Cities Station has approximately 116 controlled access areas with dose rates greater than 100 mrem per hour. No more than 70 of these areas have dose rates greater than 1000 mrem per hour. The proposed changes will reduce the number of HRAs which are required to be locked, and establish controls commensurate with the potential radiological hazard in areas with dose rates between 100 mrem per hour and 1000 mrem per hour. These controls include the RWP program and advanced electronic dosimetry. The RWP program requires a daily review and signature, by an individual, of each RWP that the individual will be working under. This programmatic control measure is supplemented with the issuance of an integrating and alarming electronic dosimeter to each individual, prior to entry into the Radiologically Controlled Area (RCA).

Relaxation of the locking requirement will also allow the station to more effectively control access to the areas with potentially significant dose rates (i.e. greater than 1000 mrem per hour). A reduction in the number of locked access points will allow the station to better allocate surveillance and maintenance resources to those HRA access points with the greatest potential for a significant inadvertent exposure. This in turn will help ensure that the control mechanism at these points is operable at all times, and therefore, that unauthorized entry into these areas (due to a door left unlocked, or a faulty locking mechanism) is prevented.

The proposed Technical Specification amendment provides an alternative requirement for controlling access to high radiation areas. The proposed change does not alter the occupancy of personnel in high radiation areas, only the method used to control access. Thus, there is no increase in individual or cumulative occupational radiation exposure. Therefore, the proposed change is administrative in nature and has no impacts on plant safety or systems as described in the UFSAR, and as such, the previous safety analyses and assumptions remain bounding.

ATTACHMENT B

PROPOSED CHANGES TO APPENDIX A,
TECHNICAL SPECIFICATIONS OF FACILITY
OPERATING LICENSES DPR-29 AND DPR-30

REVISED PAGES

UNIT ONE (DPR-29)

iv
6.1 - 3
6.1 - 4
6.1 - 5
6.1 - 6
6.1 - 9
6.1 - 10
6.2 - 1
6.2 - 2
6.11 - 1 (new page)
6.12 - 1 (new page)

UNIT TWO (DPR-30)

iv
6.1 - 3
6.1 - 4
6.1 - 5
6.1 - 6
6.1 - 9
6.1 - 10
6.2 - 1
6.2 - 2
6.11 - 1 (new page)
6.12 - 1 (new page)

ATTACHMENT B (continued)

1. Page iv (DPR-29)
Page iv (DPR-30)

A. Insert Sections 6.11 and 6.12 into the Table of Contents.

2. Page 6.1 - 3 (DPR-29)
Page 6.1 - 3 (DPR-30)

A. Revision of position title to reflect current CEC Co organizational nomenclature.

Delete "Assistant Vice President (AVP)"
Insert "General Manager (GM)"

3. Page 6.1 - 4 (DPR-29)
Page 6.1 - 4 (DPR-30)

A. Revision of position title to reflect current CEC Co organizational nomenclature.

Delete "AVP"
Insert "GM"

B. Revision of approval authority.

Delete "Such responsibility is delegated to the Nuclear Quality Programs Manager."

Insert "Such responsibility may be delegated by the GM Quality Programs and Assessment."

4. Page 6.1 - 4 (DPR-29)
Page 6.1 - 5 (DPR-30)

A. Revision of approval authority.

Delete "The Nuclear Quality Programs Manager"
Insert "Either the above, or designated corporate staff or supervision approved by GM Quality Programs and Assessment"

ATTACHMENT B (continued)

5. Page 6.1 - 5 (DPR-29)
Page 6.1 - 5 (DPR-30)

A. Revision of position title to reflect current CECo organizational nomenclature.

Delete "AVP"
Insert "GM"

6. Page 6.1 - 6 (DPR-29)
Page 6.1 - 6 (DPR-30)

A. Revision of position title to reflect current CECo organizational nomenclature.

Delete "AVP"
Insert "GM"

7. Page 6.1 - 6 (DPR-29)

A. Correction of typographical error.

Delete "manager"
Insert "Manager"

8. Page 6.1 - 9 (DPR-29)
Page 6.1 - 9 (DPR-30)

A. Revision of position title to reflect current CECo organizational nomenclature.

Delete "AVP"
Insert "GM"

9. Page 6.1 - 10 (DPR-29)
Page 6.1 - 10 (DPR-30)

A. Revision of position title to reflect current CECo organizational nomenclature.

Delete "AVP"
Insert "GM"

ATTACHMENT B (continued)

10. Page 6.2 - 2 (DPR-29)
Page 6.2 - 2 (DPR-30)

A. Radiation Protection Procedures

Delete Technical Specification 6.2.B

B. 6.2.C.1 Procedure Review

Delete "and 6.2.B"

Insert "and 6.11"

C. 6.2.C.2 Procedure Review

Delete "6.2.B"

Insert "6.11"

D. 6.2.D Temporary changes to procedures

Delete "6.2.B above"

Insert "6.11"

11. Page 6.11 - 1 (DPR-29)
Page 6.11 - 1 (DPR-30)

A. Radiation Protection Program

Insert Section 6.11 "Radiation Protection Program".

12. Page 6.12 - 1 (DPR-29)
Page 6.12 - 1 (DPR-30)

A. High Radiation Area

Insert Section 6.12 "High Radiation Area."