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**ComEd**

PCA-95-029

April 26, 1995

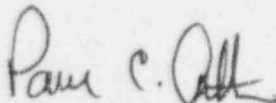
U. S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, D.C. 20555

SUBJECT: Quad Cities Nuclear Station Units 1 and 2  
Changes, Tests, and Experiments Completed  
NRC Docket Nos. 50-254 and 50-265

Enclosed please find a listing of those facility and procedure changes, tests, and experiments requiring safety evaluations completed during the month of February and March, 1995, for Quad-Cities Station Units 1 and 2, DPR-29 and DPR-30. A summary of the safety evaluations are being reported in compliance with 10CFR50.59 and 10CFR50.71(e).

Respectfully,

ComEd  
Quad-Cities Nuclear Power Station



Paul C. Aitken  
System Engineering Supervisor

PCA/dak

Enclosure

cc: J. Martin, Regional Administrator  
C. Miller, Senior Resident Inspector

SAFETY\NRC.LTR

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SE-99-008  
Procedure Change QCTS 430-5

**DESCRIPTION:**

Changed the Procedure QCTS 430-5 to address two carbon test canisters to be removed from SBTG and tested to Tech Spec criteria (current and proposed).

**SAFETY EVALUATION SUMMARY:**

1. The change described above has been analyzed to determine each accident or anticipated transient described in the UFSAR where any of the following is true:
  - The change alters the initial conditions used in the UFSAR analysis.
  - The changed structure, system or component is explicitly or implicitly assumed to function during or after the accident.
  - Operation or failure of the changed structure, system, or component could lead to the accident.

The accidents which meet these criteria are listed below:

LOCA	UFSAR SECTION	15.6
Refueling Accident	UFSAR SECTION	15.7

For each of these accidents, it has been determined that the change described above will not increase the probability of an occurrence or the consequence of the accident, or malfunction of equipment important to safety as previously evaluated in the UFSAR.

2. The possibility for an accident or malfunction of a different type than any previously evaluated in the UFSAR is not created because doing an additional charcoal absorber efficiency test for the Standby Gas Treatment ensures that we meet both the current and proposed Technical Specifications. This additional test will not affect the normal operation of the Standby Gas Treatment System or any other system. This change will not create the possibility of a different accident.
3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because the Technical Specification testing criteria are not being eliminated. They will be complimented by the test criteria from the proposed Technical Specifications. The margin of safety will not be reduced. The 90% limit remains just the testing criteria is being adjusted.

SE-95-009  
Removal of Insulation for Prior to Outage Work

**DESCRIPTION:**

During the month of February 1995, the 2A RHR Heat Exchanger (upper portion) and valve 2-1001-5A was de-insulated to remove asbestos insulation for pre-outage work. Prior to startup from Q2R13 in June, this equipment will be re-insulated with non-asbestos materials.

**SAFETY EVALUATION SUMMARY:**

1. The change described above has been analyzed to determine each accident or anticipated transient described in the UFSAR where any of the following is true:
  - The change alters the initial conditions used in the UFSAR analysis.
  - The changed structure, system or component is explicitly or implicitly assumed to function during or after the accident.
  - Operation or failure of the changed structure, system, or component could lead to the accident.

The accidents which meet these criteria are listed below:

B LOCA	UFSAR SECTION 15.6.2, 15.6..5
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For each of these accidents, it has been determined that the change described above will not increase the probability of an occurrence or the consequence of the accident, or malfunction of equipment important to safety as previously evaluated in the UFSAR.

2. The possibility for an accident or malfunction of a different type than any previously evaluated in the UFSAR is not created because since no new failure modes are created and since the river is so cold (near 32°F) the thermal heat capacity will not be affected by this insulation removal. The insulation also performs a limited amount of radiation shielding, but since river water is the process liquid, added exposure during this short duration removal will not appreciably increase dose rates.
3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because Tech Spec 3.5.B requires the Containment Cooling mode of RHR to be operable and provides limits for flow rates. These limits and system operability will not be affected by the removal of insulation on this equipment.

**DESCRIPTION:**

The CONT Rad box is not mentioned in the original procedure. This revision corrected this. Also added computer points that input to this indicating box, for reference.

**SAFETY EVALUATION SUMMARY:**

1. The change described above has been analyzed to determine each accident or anticipated transient described in the UFSAR where any of the following is true:
  - The change alters the initial conditions used in the UFSAR analysis.
  - The changed structure, system or component is explicitly or implicitly assumed to function during or after the accident.
  - Operation or failure of the changed structure, system, or component could lead to the accident.

The accidents which meet these criteria are listed below:

None

For each of these accidents, it has been determined that the change described above will not increase the probability of an occurrence or the consequence of the accident, or malfunction of equipment important to safety as previously evaluated in the UFSAR.

2. The possibility for an accident or malfunction of a different type than any previously evaluated in the UFSAR is not created because SPDS display or its operation is not changing. The procedure which describes the computer input points, color determinations, and their meanings is being updated to include all indications on the SPDS display. It does not adversely impact systems or functions so as to create the possibility of an accident or malfunction of a type different from those previously evaluated in the UFSAR.
3. The margin of safety, is not defined in the basis for any Technical Specification, therefore, the safety margin is not reduced.

SE-95-012  
Interim Procedure  
Procedure Revision QCAP 1100-5 Rev. 6

**DESCRIPTION:**

Provided a better description of Interim Procedure distribution methodologies and creation of our Interim Procedure Index for the Work Control Center, Shift Engineer and Main Control Room Interim Procedure Books.

**SAFETY EVALUATION SUMMARY:**

1. The change described above has been analyzed to determine each accident or anticipated transient described in the UFSAR where any of the following is true:
  - The change alters the initial conditions used in the UFSAR analysis.
  - The changed structure, system or component is explicitly or implicitly assumed to function during or after the accident.
  - Operation or failure of the changed structure, system, or component could lead to the accident.

The accidents which meet these criteria are listed below:

None

For each of these accidents, it has been determined that the change described above will not increase the probability of an occurrence or the consequence of the accident, or malfunction of equipment important to safety as previously evaluated in the UFSAR.

2. The possibility for an accident or malfunction of a different type than any previously evaluated in the UFSAR is not created because the change to the Station Interim Procedure procedure does not adversely impact system or component functions. The possibility of any accident or malfunction is not directly affected.
3. The margin of safety, is not defined in the basis for any Technical Specification, therefore, the safety margin is not reduced.



## QCAP 1500-1, Administrative Requirements for Fire Protection

**DESCRIPTION:**

Three main changes were made to these procedures:

1. Changed method used to determine reportability. Reportability will be made based upon safety significance.
2. Removal of system inoperability when a single fire pump is inoperable (Ref. SESR 4-2524).
3. Changed errors in surveillance attachments for fire systems that can only be tested during an outage do to inaccessibility during operation.

**SAFETY EVALUATION SUMMARY:**

1. The change described above has been analyzed to determine each accident or anticipated transient described in the UFSAR where any of the following is true:
  - The change alters the initial conditions used in the UFSAR analysis.
  - The changed structure, system or component is explicitly or implicitly assumed to function during or after the accident.
  - Operation or failure of the changed structure, system, or component could lead to the accident.

The accidents which meet these criteria are listed below:

Design Basis Fire

UFSAR SECTION 9.5.1

For each of these accidents, it has been determined that the change described above will not increase the probability of an occurrence or the consequence of the accident, or malfunction of equipment important to safety as previously evaluated in the UFSAR.

2. The possibility for an accident or malfunction of a different type than any previously evaluated in the UFSAR is not created because these changes are administrative in nature and do not describe how systems are operated. This includes changes to reporting requirements and changes to componentary actions. The changes to surveillance requirements have already been approved by previous procedure changes/safety evaluations. These changes are to correct errors in internals found during GSRV reviews.

SE-95-014 CONTD

3. The margin of safety, is not defined in the basis for any Technical Specification, therefore, the safety margin is not reduced.

**DESCRIPTION:**

This is a new procedure not described in the UFSAR. The procedure flushes the CRD drive ball check. The flush is performed by inserting a single rod scram using only vessel pressure. The associated scram flow will flush reactor water through the drive ball check.

**SAFETY EVALUATION SUMMARY:**

1. The change described above has been analyzed to determine each accident or anticipated transient described in the UFSAR where any of the following is true:
  - The change alters the initial conditions used in the UFSAR analysis.
  - The changed structure, system or component is explicitly or implicitly assumed to function during or after the accident.
  - Operation or failure of the changed structure, system, or component could lead to the accident.

The accidents which meet these criteria are listed below:

None

For each of these accidents, it has been determined that the change described above will not increase the probability of an occurrence or the consequence of the accident, or malfunction of equipment important to safety as previously evaluated in the UFSAR.

2. The possibility for an accident or malfunction of a different type than any previously evaluated in the UFSAR is not created because the flush of the CRD ball check will involve scrambling the rod using only reactor pressure. The UFSAR states that the CRD is designed for this action.

Scramming the rod with only reactor pressure will cause flow to lift the CRD ball check and produce flow around the ball and seat. Flushing will insure that the ball is clear of possible crud accumulation.

The rod is capable of performing its design function during this flush. The UFSAR states that when the reactor is at full operating pressure, the CRD is capable of meeting scram time requirements.



3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because Tech Spec states that at all operating pressures, a CRD accumulator may be inoperable provided that no other accumulator in a 9X9 array around that rod has 1) an inoperable accumulator. 2) DCV electrically disarmed, or 3) SCRAM time greater than permissible.

The procedure requires that this limitation be met. The TS requirements are met during this procedure.

## Procedure Changes to QCOP 6600-6 and QCOP 5750-9

**DESCRIPTION:**

QCOP 5750-9 was changed to trip portions of Reactor and Turbine Building lighting prior to starting Control Room HVAC B Train during a LOCA.

QCOP 6600-6 was changed to restore the lighting after the 1/2 DG is no longer required and has been shut down.

**SAFETY EVALUATION SUMMARY:**

1. The change described above has been analyzed to determine each accident or anticipated transient described in the UFSAR where any of the following is true:
  - The change alters the initial conditions used in the UFSAR analysis.
  - The changed structure, system or component is explicitly or implicitly assumed to function during or after the accident.
  - Operation or failure of the changed structure, system, or component could lead to the accident.

The accidents which meet these criteria are listed below:

LOOP/LOCA

UFSAR SECTION 15.6

For each of these accidents, it has been determined that the change described above will not increase the probability of an occurrence or the consequence of the accident, or malfunction of equipment important to safety as previously evaluated in the UFSAR.

2. The possibility for an accident or malfunction of a different type than any previously evaluated in the UFSAR is not created because this change is for the Turbine Building and Reactor Building normal lighting only. Emergency and battery powered lighting is not impacted by this change. Tripping the normal Turbine and Reactor Building lighting prior to starting the B Control Room HVAC system provides an additional margin of safety to assure that the Emergency Diesel Generator loading does not exceed its 2000 hour rating. This also assures the setpoint of the second level undervoltage relay provides protection to all required safety related equipment.
3. The margin of safety, is not defined in the basis for any Technical Specification, therefore, the safety margin is not reduced.

**DESCRIPTION:**

Replaced HPCI Main Steam Supply Line Condensate Drain Steam Trap internals on 1-2301-1.

**SAFETY EVALUATION SUMMARY:**

1. The change described above has been analyzed to determine each accident or anticipated transient described in the UFSAR where any of the following is true:
  - The change alters the initial conditions used in the UFSAR analysis.
  - The changed structure, system or component is explicitly or implicitly assumed to function during or after the accident.
  - Operation or failure of the changed structure, system, or component could lead to the accident.

The accidents which meet these criteria are listed below:

Inadvertent initiation of HPCI	
injection during power operation.	UFSAR SECTION 15.5.1
Inadvertent opening of Safety Valve	UFSAR SECTION 15.6.1
LOCA - Piping break inside containment	UFSAR SECTION 15.6.5

For each of these accidents, it has been determined that the change described above will not increase the probability of an occurrence or the consequence of the accident, or malfunction of equipment important to safety as previously evaluated in the UFSAR.

2. The possibility for an accident or malfunction of a different type than any previously evaluated in the UFSAR is not created because the only parameter that would change when the steam trap internals on 1-2301-1 are replaced would be increased condensate flow through the steam trap at warm-up and normal running loads. Increases condensate flow would not create the possibility of an accident or malfunction different from those evaluated in the UFSAR. The design of the HPCI turbine steam line piping configuration allows for steam trap bypass. The safety related pressure boundary of the HPCI Steam supply line will be maintained.
3. The margin of safety, is not defined in the basis for any Technical Specification, therefore, the safety margin is not reduced.

SE-95-017  
QCAP 650-5 Drywell & Torus Initial Entry

**DESCRIPTION:**

Addressed items the initial entry team needs should the DW personnel interlocks become inoperable. Decreased the power level allowed for entry and direct the shutdown of HWCS.

**SAFETY EVALUATION SUMMARY:**

1. The change described above has been analyzed to determine each accident or anticipated transient described in the UFSAR where any of the following is true:
  - The change alters the initial conditions used in the UFSAR analysis.
  - The changed structure, system or component is explicitly or implicitly assumed to function during or after the accident.
  - Operation or failure of the changed structure, system, or component could lead to the accident.

The accidents which meet these criteria are listed below:

None

For each of these accidents, it has been determined that the change described above will not increase the probability of an occurrence or the consequence of the accident, or malfunction of equipment important to safety as previously evaluated in the UFSAR.

2. The possibility for an accident or malfunction of a different type than any previously evaluated in the UFSAR is not created because these changes do not affect equipment operation. Since equipment operation remains unchanged, the possibility of an accident or malfunction occurring is not created or increased.

Drywell entries at power are allowed by the UFSAR and these controls that are being added to/changed in procedure do not conflict with the UFSAR.

3. The margin of safety, is not defined in the basis for any Technical Specification, therefore, the safety margin is not reduced.

**DESCRIPTION:**

Excluded venting outboard volume of valves MO 1(2)-1001-23A/B, MO 1(2)-1001-34A/B and inboard volume of Valve MO 1(2)-1001-36A/B from 10CFR50 Appendix J Type C test requirements in accordance with 10CFR50 Appendix J Section III C.3

**SAFETY EVALUATION SUMMARY:**

1. The change described above has been analyzed to determine each accident or anticipated transient described in the UFSAR where any of the following is true:
  - The change alters the initial conditions used in the UFSAR analysis.
  - The changed structure, system or component is explicitly or implicitly assumed to function during or after the accident.
  - Operation or failure of the changed structure, system, or component could lead to the accident.

The accidents which meet these criteria are listed below:

LOCA

UFSAR SECTION 15.6.5

For each of these accidents, it has been determined that the change described above will not increase the probability of an occurrence or the consequence of the accident, or malfunction of equipment important to safety as previously evaluated in the UFSAR.

2. The possibility for an accident or malfunction of a different type than any previously evaluated in the UFSAR is not created because no seat leakage past MO 1(2)-1001-23A/B, MO 1(2)-1001-34A/B, and MO 1(2)-1001-36A.B in the closed position is inconsequential for fulfillment of their safety function. Any leakage would be toward containment and would aid in sealing any containment leakage.
3. The margin of safety, is not defined in the basis for any Technical Specification, therefore, the safety margin is not reduced.



**DESCRIPTION:**

Provided the necessary steps to perform a differential pressure test on MO 1(2)-2301-15.

**SAFETY EVALUATION SUMMARY:**

1. The change described above has been analyzed to determine each accident or anticipated transient described in the UFSAR where any of the following is true:
  - The change alters the initial conditions used in the UFSAR analysis.
  - The changed structure, system or component is explicitly or implicitly assumed to function during or after the accident.
  - Operation or failure of the changed structure, system, or component could lead to the accident.

The accidents which meet these criteria are listed below:

Small Break LOCA

UFSAR SECTION 15.6

For each of these accidents, it has been determined that the change described above will not increase the probability of an occurrence or the consequence of the accident, or malfunction of equipment important to safety as previously evaluated in the UFSAR.

2. The possibility for an accident or malfunction of a different type than any previously evaluated in the UFSAR is not created because performance of this procedure is performed consistent with the routine HPCI pump operability surveillance. The HPCI system is operated with the design capabilities of the system. Although the automatic closure function of the HPCI minimum flow valve is disabled, it does not impact either HPCI operability since HPCI can provide adequate flow even with the minimum flow valve failed open. Primary Containment is not affected since the discharge of the minimum flow line is below the minimum water level of the Torus.
3. The margin of safety, is not defined in the basis for any Technical Specification, therefore, the safety margin is not reduced.

SE-95-020  
Setpoint Change 95-009E

**DESCRIPTION:**

Adjusted the upper travel limit for the Unit 1 and Unit 2 Refuel Bridge Monorail Hoist by approximately 3 feet from the height of the personnel walkway handrail. Both the mechanical and electrical stops were adjusted to implement this change. A UFSAR change is being submitted which will reflect the additional travel distance due to the raising of the upper travel limit. The UFSAR change will indicate a travel of approximately 90 feet.

**SAFETY EVALUATION SUMMARY:**

1. The change described above has been analyzed to determine each accident or anticipated transient described in the UFSAR where any of the following is true:
  - The change alters the initial conditions used in the UFSAR analysis.
  - The changed structure, system or component is explicitly or implicitly assumed to function during or after the accident.
  - Operation or failure of the changed structure, system, or component could lead to the accident.

The accidents which meet these criteria are listed below:

None

For each of these accidents, it has been determined that the change described above will not increase the probability of an occurrence or the consequence of the accident, or malfunction of equipment important to safety as previously evaluated in the UFSAR.

2. The possibility for an accident or malfunction of a different type than any previously evaluated in the UFSAR is not created because the potential failure of the upper limit setting has already been evaluated in the UFSAR. There are no changes to the function or operation of the upper limit for the monorail hoist. The setpoint change allows the tip of the cable to be raised an additional 3 feet before the upper travel limit sets in to prevent further movement.
3. The margin of safety, is not defined in the basis for any Technical Specification, therefore, the safety margin is not reduced.

SE-95-021  
Replace T.O.L. Heater for 2-5746A-M10

**DESCRIPTION:**

This change replaced the existing heater with General Electric Part Number CR123C137B.

**SAFETY EVALUATION SUMMARY:**

1. The change described above has been analyzed to determine each accident or anticipated transient described in the UFSAR where any of the following is true:
  - The change alters the initial conditions used in the UFSAR analysis.
  - The changed structure, system or component is explicitly or implicitly assumed to function during or after the accident.
  - Operation or failure of the changed structure, system, or component could lead to the accident.

The accidents which meet these criteria are listed below:

Large Break LOCA

UFSAR SECTION 6.3

For each of these accidents, it has been determined that the change described above will not increase the probability of an occurrence or the consequence of the accident, or malfunction of equipment important to safety as previously evaluated in the UFSAR.

2. The possibility for an accident or malfunction of a different type than any previously evaluated in the UFSAR is not created because this change does not adversely affect any systems or functions. Therefore, it does not create the possibility of an accident or malfunction. (Reference Setpoint Change Request 95-008E)
3. The margin of safety, is not defined in the basis for any Technical Specification, therefore, the safety margin is not reduced.

**DESCRIPTION:**

This procedure change added steps to have the 2/3 core level interlock with containment spray overridden during testing of 2/3 core level XMTRS and MTVR's.

**SAFETY EVALUATION SUMMARY:**

1. The change described above has been analyzed to determine each accident or anticipated transient described in the UFSAR where any of the following is true:
  - The change alters the initial conditions used in the UFSAR analysis.
  - The changed structure, system or component is explicitly or implicitly assumed to function during or after the accident.
  - Operation or failure of the changed structure, system, or component could lead to the accident.

The accidents which meet these criteria are listed below:

Loss of Coolant	UFSAR SECTION 15.6.2, 15.6.5
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For each of these accidents, it has been determined that the change described above will not increase the probability of an occurrence or the consequence of the accident, or malfunction of equipment important to safety as previously evaluated in the UFSAR.

2. The possibility for an accident or malfunction of a different type than any previously evaluated in the UFSAR is not created because during the calibration of the 2/3 core height instrumentation, the indicated level to the RHR logic may be less than 2/3 core height for short periods of time. If an accident were to occur during this time, the operator would be prevented from spraying the containment. To prevent this, the Tech Spec's require that the system be tripped such that the containment spray function not to be prevented. This is accomplished by placing the override switch to "override". This will not affect LPCI operation, since the operator must still manually initiate containment spray. The operator is procedurally prevented from using containment spray when LPCI is required and available. With the high amount of supervision present in the control room, it is unlikely that the containment would be inadvertently sprayed when LPCI is required to inject.

SE-95-022 CONTD

3. The margin of safety, is not defined in the basis for any Technical Specification, therefore, the safety margin is not reduced.



## Analyzing the bottom head drain effect on the DBA LOCA Analysis

**DESCRIPTION:**

It is postulated that in the event of a Reactor Recirculation line design basis LOCA (DBA LOCA), upon initial depressurization of the reactor to the drywell as analyzed in the UFSAR, the non-isolable bottom head drain would permit continued draining of the vessel lower plenum area via the interconnected Recirculation and bottom head RWCU suction lines. This specific event sequence was not discussed in the UFSAR analysis and it was considered to have insignificant effects by GE during performance of the original LOCA analysis. Originally, the drain line had a closed valve with a small hole drilled in the disc to allow for a minimum flow to the RWCU to prevent the accumulation of cold water. With this configuration the effect was minimum. However, Unit One drain line was modified into a 2" line with an open globe valve (M04-1-82-44) in 1982. Similarly, Unit Two was modified under M04-2-83-22 in 1983.

**SAFETY EVALUATION SUMMARY:**

1. The change described above has been analyzed to determine each accident or anticipated transient described in the UFSAR where any of the following is true:
  - The change alters the initial conditions used in the UFSAR analysis.
  - The changed structure, system or component is explicitly or implicitly assumed to function during or after the accident.
  - Operation or failure of the changed structure, system, or component could lead to the accident.

The accidents which meet these criteria are listed below:

Large/Small Break LOCA

UFSAR SECTION 6.2.1.3.2

For each of these accidents, it has been determined that the change described above will not increase the probability of an occurrence or the consequence of the accident, or malfunction of equipment important to safety as previously evaluated in the UFSAR.

2. The possibility for an accident or malfunction of a different type than any previously evaluated in the UFSAR is not created because the change does not adversely impact systems or functions so as to create the possibility of an accident or malfunction of a type different from those evaluated in the UFSAR. General Electric and Nuclear Fuel Services have analyzed the effect of the bottom head drain line and determined that the increase in fuel Peak Cladding Temperature (PCT) will be less than 10°F. The current PCT for Quad Cities is 1680°F, with a design limit of 2200°F. Even with the added 10°F due to the bottom head drain line, the PCT value will be 1690°F which is well below the design limit. GE has stated that the impact on core heatup of considering the bottom head drain line flow is to increase the effective size of the postulated LOCA by approximately 0.0205 ft<sup>2</sup>. The design basis recirculation suction break size of 4.26 ft<sup>2</sup> was used in the GE DBA LOCA analysis. With the added effect from the bottom head drain the new break area value is 4.28 ft<sup>2</sup>, which is still conservative since the UFSAR limit for the break area is 5.62 ft<sup>2</sup>. The DBA LOCA analysis is conservative with the bottom head drain line included. The existing UFSAR analysis for the reactor recirculating line design basis LOCA, with respect to post LOCA blowdown effects to containment remain bounding. Plant operation is not affected with this change in the analysis. The impact of the bottom head drain is minimal and well within the General Electric and UFSAR reactor recirculation line design basis LOCA. There is no unreviewed safety question with this addition of the bottom head drain to the reactor recirculation line design basis LOCA analysis.
3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because the effect of the bottom head drain line is minimal and will not reduce the margin of safety. The final Peak Cladding Temperature is well below the Technical Specification design requirement of 2200°F. General Electric and Nuclear Fuel Services have analyzed the effect of the bottom head drain line and determined that the increase in fuel Peak Cladding Temperature (PCT) will be less than 10°F. The current PCT for Quad Cities is 1680°F, with a design limit of 2200°F. Even with the added 10°F due to the bottom head drain line, the PCT value will be 1690°F which is well below the design limit.

SE-95-026  
Interim Procedure # 929

**DESCRIPTION:**

This procedure provided the necessary steps to determine the minimum instrument air accumulator pressure required for fail safe actuation of the Reactor Building Vent Isolation Damper AO 2-5742B.

**SAFETY EVALUATION SUMMARY:**

1. The change described above has been analyzed to determine each accident or anticipated transient described in the UFSAR where any of the following is true:
  - The change alters the initial conditions used in the UFSAR analysis.
  - The changed structure, system or component is explicitly or implicitly assumed to function during or after the accident.
  - Operation or failure of the changed structure, system, or component could lead to the accident.

The accidents which meet these criteria are listed below:

LOCA	UFSAR SECTION 15.6.2
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For each of these accidents, it has been determined that the change described above will not increase the probability of an occurrence or the consequence of the accident, or malfunction of equipment important to safety as previously evaluated in the UFSAR.

2. The possibility for an accident or malfunction of a different type than any previously evaluated in the UFSAR is not created because the test will provide several precautions to ensure that if an emergency isolation signal is received, the system will still be able to perform its intended function. Although damper AO-2-5742B will not isolate during portions of the test, there will still be an isolation valve available for the exhaust portion of the system (AO 2-5742A) and the supply side dampers will also be closed. The Reactor Building Ventilation System is not interlocked with the Reactor Systems. This procedure will not create the possibility of a new accident.
3. The margin of safety, is not defined in the basis for any Technical Specification, therefore, the safety margin is not reduced.

SE-95-028  
Technical Specification 3.9 Bases Change

**DESCRIPTION:**

The Technical Specifications for Quad Cities Units 1 (DPR-29) and 2 (DPR-30) require the availability of the 4160 volt bus tie during plant operation in order to provide a second source of off-site power. Specifically, Unit 1 Technical Specification LCO 3.9.A.3 states that "One other 345kv line capable of carrying auxiliary power to an essential electrical bus of the unit through the 4160 volt bus tie shall be available. Similarly, Unit 2 Technical Specification LCO 3.9.A.3 states the same requirement. This evaluation addresses utilization of the safety-related 4kV Division I crosstie, which was installed as part of the actions to address the Station Blackout Rule, to satisfy the LCO requirement (3.9.A.3). The evaluation will support a Technical Specification bases change which will identify 'the 4160 volt bus tie' as either the Division I crosstie (between buses 13-1 and 23-1) or the Division II crosstie (between buses 14-1 and 24-1).

**SAFETY EVALUATION SUMMARY:**

1. The change described above has been analyzed to determine each accident or anticipated transient described in the UFSAR where any of the following is true:
  - The change alters the initial conditions used in the UFSAR analysis.
  - The changed structure, system or component is explicitly or implicitly assumed to function during or after the accident.
  - Operation or failure of the changed structure, system, or component could lead to the accident.

The accidents which meet these criteria are listed below:

Loss of Auxiliary Power	UFSAR Section 8.3.1
Power Bus Loss of Voltage	UFSAR Section 8.3.1

For each of these accidents, it has been determined that the change described above will not increase the probability of an occurrence or the consequence of the accident, or malfunction of equipment important to safety as previously evaluated in the UFSAR.



2. The possibility for an accident or malfunction of a different type than any previously evaluated in the UFSAR is not created because the use of the Division I crosstie to satisfy Technical Specification requirement 3.9.A.3 does not create the possibility of an accident or malfunction of a different type. The Division I crosstie is based on the design of the Division II crosstie, and has the same procedural controls, as detailed in the response to question 5. The Division I crosstie is physically separated from the normal and emergency power sources for the Division I buses (13-1/23-1), and does not prevent those sources from performing their intended functions (e.g., the connectability of the 1/2 emergency diesel generator to a safety bus takes precedence over the use of the crosstie). In addition, the control circuitry associated with the Division I crosstie prevents usage (closure) when the 1/2 emergency diesel generator is connected to a safety bus (either 13-1 or 23-1).
3. The margin of safety, as defined in the basis for any Technical Specification, is not reduced because the Division I crosstie is based on the design of the Division II crosstie, and has associated protective and control features which, as a minimum, are equivalent to that of the Division II crosstie. As such, the margin of safety is increased by having the capability to provide the second source of off-site power via an additional crosstie (the Division I crosstie). The availability of the second source of offsite power to an operating unit has been increased.