



**Commonwealth Edison**

One First National Plaza, Chicago, Illinois

Address Reply to: Post Office Box 767  
Chicago, Illinois 60690

November 27, 1984

Mr. Harold R. Denton, Director  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

Subject: Quad Cities Station Units 1 & 2  
Proposed Technical Specification Amendment  
Revised Containment Pressure Setpoint and  
Deletion of Main Steam Line Isolation  
Valve Surveillance  
NRC Docket Nos. 50-254 & 50-265

Dear Mr. Denton:

Pursuant to 10CFR 50.59, Commonwealth Edison proposes amendments to Appendix A, the Technical Specifications, for Operating Licenses DPR 29 & 30. These proposed changes raises the drywell high pressure trip point from 2.0 psig to 2.5 psig and deletes the existing bi-weekly main steam isolation valve surveillance.

A summary of the proposed changes are enclosed in Attachment 1. The proposed amendments can be found in Attachments 2 & 3 and were both On-site and Off-site reviewed. We have reviewed this amendment request and find that no significant hazards consideration exists. Our review is documented in Attachment 4. Commonwealth Edison is notifying the State of Illinois of our request for this amendment by transmittal of a copy of this letter and its attachments to the designated State Official.

In accordance with 10CFR170, a fee remittance of \$150.00 is enclosed.

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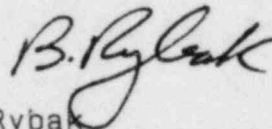
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# 9022043*

November 27, 1984

Please direct any questions you may have concerning this matter to this office.

Three (3) signed originals and thirty-seven (37) copies of this transmittal and its attachments are provided for your use.

Very truly yours,

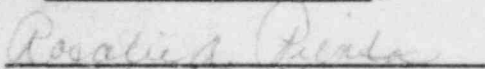


B Rybak  
Nuclear Licensing Administrator

Attachments (1): Summary of Proposed Changes  
(2): Technical Specification Change to DPR-29  
(3): Technical Specification Change to DPR-30  
(4): Evaluation of Significant Hazards Consideration

cc: Region III Inspector - Quad Cities  
R. Bevan - NRR  
M. C. Parker - Ill.

SUBSCRIBED and SWORN to  
before me this 27th day  
of November, 1984

  
Notary Public

ATTACHMENT 1  
Justification for Proposed Changes

High Drywell Pressure Setpoint

The proposed change is to raise the high drywell pressure trip setpoint from 2.0 psig to 2.5 psig. Current Technical Specifications require a 1.2 psig drywell to suppression chamber differential pressure. In practice the drywell is maintained at about 1.3 psig with the suppression chamber kept at atmospheric pressure. With the actual high drywell pressure trip setpoint maintained at less than 2.0 psig to allow for instrument drift, actual margin between the trip point and normal drywell pressure is approximately 0.6 psig. This narrow margin has in the past led to spurious actuation.

The containment isolation pressure setpoint should be as low as possible without increasing the probability of inadvertent actuation of the isolation signal. Recent NRC staff guidance (see T.A. Ippolito letter to L. O. DelGeorge dated January 7, 1980) on the resolution of TMI Item II.E.4.2.5 "Containment Pressure Setpoint" established a limit of 3.0 psig as an acceptable isolation setpoint margin over normal containment pressure. Clearly raising the high drywell pressure setpoint to 2.5 psig would fall within that acceptable margin.

The original accident analysis assumed a high drywell pressure setpoint of 2.0 psig with an unpressurized drywell. The initiation time of the ECCS system depends primarily on the rate of pressure rise in the drywell and the pressure difference between the setpoint and normal operation. Since the first parameter is relatively unaffected by this initial drywell pressure, and since the proposed setpoint change will result in a pressure difference between normal operation and the setpoint less than that used in previous LOCA analyses, the change will result in a more responsive performance of ECCS following drywell pressurization than that in the original analyses.

The high drywell pressure trip signal is used to initiate primary containment isolation and serves as a backup or conjunctive signal to initiate ECCS. This proposed change has been reviewed with respect to the time to achieve containment isolation, the performance of ECCS, and the containment response to a postulated LOCA. The higher initial containment pressure will slightly improve ECCS pump performance due to the small increase in the NPSH accompanied by a lesser increase in pump discharge pressure. In addition, the change in the containment isolation time and the containment pressure response will be small since they are primarily a function of the differential pressure from drywell ambient and the trip setting. The margins between the containment design pressure and temperature, and the calculated results for a spectrum of breaks is sufficiently large to accommodate the small changes associated

with the higher setpoint. Fuel peak clad temperatures should be unaffected in the event of a DBA-LOCA by the 0.5 psig increase in containment pressure, as the rate of discharge from a postulated double-ended pipe rupture would be at choked flow conditions, and independent of discharge pressure.

Therefore it is our conclusion that this change also falls within the bounds of the original accident analyses.

#### Bi-Weekly MSIV Surveillance

The proposed change is to delete the bi-weekly main steam line valve partial closure test. The MSIV's have already shown a high degree of reliability as far as the exercise aspects of the bi-weekly test. As the monthly scram also adequately demonstrates proper valve movement, there is no need for the bi-weekly test. Support of this position can be found in the Standardized BWR Technical Specifications - the STS does not impose any greater frequency of testing over that of other primary containment valves. The only other change is the note on page 3.7/4.7-10 in DPR-29 was removed as MO-220-2 was restored to operability.