

ATTACHMENT 2

Proposed Amendment to DPR-30

BARRIER FUEL RAMP TEST  
END OF CYCLE 7  
INCREASED LHGR

Revised Page: 3.5/4.5-10

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within the prescribed limit within 2 hours, the reactor shall be brought to the cold shutdown condition within 36 hours. Surveillance and corresponding action shall continue until reactor operation is within the prescribed limits. Maximum allowable LHGR for all 8X8 fuel types is 13.4 KW/ft.\*

K. Minimum Critical Power Ratio (MCPR)

During steady-state operation at rated core flow, MCPR shall be greater than or equal to:

$$1.34 \text{ for } \bar{T}_{ave} \geq 0.73 \text{ secs}$$

$$1.39 \text{ for } \bar{T}_{ave} \geq 0.86 \text{ secs}$$

$$0.385 \bar{T}_{ave} + 1.059 \\ \text{for } 0.73 < \bar{T}_{ave} < 0.86 \text{ secs}$$

where  $\bar{T}_{ave}$  = mean 20% scram insertion time for all surveillance data from Specification 4.3.C which has been generated in the current cycle.

For core flows other than rated, these nominal values of MCPR shall be increased by a factor of  $k_f$  where  $k_f$  is as shown in Figure 3.5.2. If any time during operation it is determined by normal surveillance that the limiting value for MCPR is being exceeded, action shall be initiated within 15 minutes to restore operation to within the prescribed limits. If the steady-state MCPR is not returned to within the prescribed limits within 2 hours, the reactor shall be brought to the cold shutdown condition within 36 hours. Surveillance and corresponding action shall continue until reactor operation is within the prescribed limits.

K. Minimum Critical Power (MCPR)

The MCPR shall be determined daily during steady-state power operation above 25% of rated thermal power.

\* For the purpose of the end of Cycle 7 Barrier Fuel Ramp Test, the steady-state LHGR for the Barrier Ramp Cell fuel may exceed the maximum allowable LHGR identified in Technical Specification 3.5.J by no more than 12 percent (15.0 KW/ft), effective from initiation of the test until the end of Cycle 7 shutdown.

### ATTACHMENT 3

#### Evaluation of Significant Hazards Consideration

##### Description of Amendment Request

This amendment would raise the LHGR limit from 13.4 kw/ft to 15.0 kw/ft for the 16 barrier fuel assemblies located in the four barrier fuel test ramp cells.

##### Basis for Proposed No Significant Hazards Consideration Determination

Commonwealth Edison has evaluated the proposed Technical Specification amendment 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(c), operation of Quad Cities Unit 1 in accordance with the proposed amendment will not:

- 1) Involve a significant increase in the probability or consequences of an accident previously evaluated because adequate margin to the 1% plastic strain limit is maintained for all of the FSAR transients.
- 2) Create the possibility of a new or different kind of accident from any accident previously evaluated because the proposed technical specification waiver does not allow any new modes of operation beyond that normally performed at operating BWRs.
- 3) Involve a significant reduction in the margin of safety because a 4.8 kw/ft (or greater) margin to the 1% plastic strain limit exists for the worst FSAR transient.

Additionally, this request is of a type which was specifically cited in the Federal Register (48FR14870) as an example of license amendment not involving significant hazards and therefore not requiring opportunity for prior hearings. That is:

- vi A change which either may result in some increase to the probability or consequences of a previously analysed 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 Standard Review Plan.

In consideration of the above, Commonwealth Edison believes that NRC approval of this amendment can be made as provided for by 10 CFR 50.91(a)(4).