



ESK-96-066

May 6, 1996

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

Subject: Quad Cities Nuclear Power Station Units 1 and 2 Implementation of
Technical Specification Amendment Nos. 169 and 165 and Partial
Implementation of Amendment Nos. 165 and 161 to Facility Operating
Licenses DPR-29 and DPR-30
NRC Docket Nos. 50-254 and 265

References: (a) P. Piet (ComEd) letter to U. S. NRC, dated September 17, 1993.
(b) P. Piet letter to U. S. NRC, dated July 20, 1995.
(c) P. Piet letter to U. S. NRC, dated November 14, 1995.
(d) P. Piet letter to U. S. NRC, dated January 4, 1996.
(e) J. Stang letter to D. Farrar (ComEd), dated November 27, 1995.
(f) J. Hickman letter to D. Farrar, dated January 11, 1996.

The purpose of this letter is to document ComEd's implementation of new Limiting Conditions for Operations (LCO) and Surveillance Requirements (SR) related to revisions to the Technical Specifications for 10CFR50, Appendix J, leak rate testing. These provisions are necessary to implement the requirements of Option B to 10CFR50, Appendix J, prior to May 8, 1996 at Quad Cities Station. The revised LCOs and SRs are consistent with ComEd's submittals specified in References (a), (b), (c) and (d) and correspondingly, the amendments approved by the NRC staff in Reference (e) and Reference (f).

The revisions discussed in the referenced documentation were provided in the format of Quad Cities' Technical Specification Upgrade Program (TSUP). However, Quad Cities will not be fully implementing TSUP prior to utilization of Option B to 10CFR50, Appendix J. In the interim, in order to appropriately control the implementation of the revised LCOs and SRs, the revised pages (in the current format) provided in Attachment (A) and (B) to this letter will serve as the controlling documentation. These pages are also provided herein. ComEd will implement the remainder of Amendment Numbers 165 and 161 for Quad Cities Station during the full implementation of the Technical Specification Upgrade Program.

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It should be noted that in proposed Specification 6.13, the reference to TSUP Section 4.0.B has been changed to 1.0.DD.a to maintain consistency in notation with current Technical Specification requirements. Upon the full implementation of TSUP, this reference will be appropriately changed to 4.0.B.

It should also be noted that reference to TSUP Section 4.0.C has not been selected for early implementation in proposed Specification 6.13. TSUP 4.0.C specifies that failure to perform a SR within the allowed surveillance interval shall constitute non-compliance with the operability requirements for the LCO. The definition of operability in the current Technical Specifications implies that for a system/component to be considered operable, it must satisfy its corresponding surveillance requirements. Therefore, in the interim, failure to perform a required leak rate surveillance within the allotted time interval will render the affected system/component inoperable at the time of discovery. This is consistent with current Technical Specification requirements. Because TSUP 4.0.C will not be implemented until the full implementation of TSUP, these requirements will continue to be administratively controlled until such time. Upon the full implementation of TSUP, this requirement will be explicitly stated in the Technical Specifications.

In addition, TSUP 4.0.C allows a 24 hour period to perform any missed surveillances if the action statements of the Technical Specifications are less than 24 hours. Quad Cities will not adopt this latitude until full implementation of TSUP.

If there are any questions regarding this matter, please contact this office.

Sincerely,



E. S. Kraft, Jr.

Site Vice President

Quad Cities Nuclear Power Station

Attachment: (A) Marked-up Technical Specification Pages
(B) Revised Technical Specification Pages

cc: H. J. Miller, Regional Administrator - RIII
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