

Commonwealth Edison Company
LaSalle Generating Station
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July 12, 2000

United States Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D.C. 20555

LaSalle County Station, Units 1 and 2
Facility Operating License Nos. NPF-11 and NPF-18
NRC Docket Nos. 50-373 and 50-374

Subject: NRC Safety Evaluation for LaSalle County Station Unit 1
License Amendment 140 and Unit 2 License Amendment 125

- References:
- (1) Letter from R. M. Krich (ComEd) to U.S. NRC, "Request for License Amendment for Power Uprate Operation," dated July 14, 1999.
 - (2) Letter from D. M. Skay (U.S. NRC) to ComEd, "LaSalle – Issuance of Amendments Regarding Power Uprate (TAC Nos. MA6070 and MA6071)," dated May 9, 2000.
 - (3) Letter from C. G. Pardee (ComEd) to U.S. NRC, "Response to Request for Additional Information, License Amendment Request for Power Uprate Operation," dated March 31, 2000.
 - (4) Letter from J. A. Benjamin (ComEd) to U.S. NRC, "Response to Request for Additional Information, License Amendment Request for Power Uprate Operation," dated February 15, 2000.
 - (5) Letter from J. A. Benjamin (ComEd) to U.S. NRC, "Response to Request for Additional Information, License Amendment Request for Power Uprate Operation," dated January 21, 2000.

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Commonwealth Edison (ComEd) Company in Reference 1, proposed changes to allow the operation of LaSalle County Station, Units 1 and 2, at an "uprate" power level of 3489 Megawatts thermal (MWt). The NRC in Reference 2, issued the requested license amendments. During our review of Reference 2, several items that may need clarification were identified. Our comments are contained in Attachment A.

Should you have any questions concerning this letter, please contact Mr. Frank A. Spangenberg, III, Regulatory Assurance Manager, at (815) 357-6761, extension 2383.

Respectfully,

A handwritten signature in black ink, appearing to read "Charles G. Pardee". The signature is fluid and cursive, with a large initial "C" and "P".

Charles G. Pardee
Site Vice President
LaSalle County Station

Attachment

cc: Regional Administrator – NRC Region III
NRC Senior Resident Inspector – LaSalle County Station

Attachment A
Comments on the NRC Safety Evaluation for LaSalle County Station

1. NRC Safety Evaluation (SE) Section 3.9, "Residual Heat Removal System (RHR)"

Comments

- The NRC SE Section 3.9.3 title should be "Containment Spray Cooling Mode."
- NRC SE Section 3.9.4, "Conclusion," refers to the shutdown cooling mode, fuel pool cooling assist mode and suppression pool cooling mode. It should also reference the containment spray cooling mode.

2. NRC SE Section 3.11, "Balance of Plant Piping"

Comment

NRC SE Section 3.11 has a reference to a High Pressure Core Injection (HPCI) System. This appears to be typographical error for the High Pressure Core Spray (HPCS) System.

3. NRC SE section 4.1.1.1(2), "Local Pool Temperature with SRV Discharge"

Comments

- ComEd in Reference 1, Attachment A, Section E, "Description of the Proposed Changes," identified that the Technical Specification Bases have been revised to reflect the new limitation of 208°F bulk pool temperature. However, the response to NRC Question 1 in Reference 3, identified that there exists adequate orientation and separation of ECCS suction strainers to prevent steam ingestion during SRV operation. Therefore, a suppression pool temperature limit to maintain 20°F subcooling is not required for ECCS suction strainers for the limiting SRV discharge event and for the ATWS event as discussed in Reference 1, Attachment E, Sections 4.1.1.1 and 9.3.1.
- Additionally, in order to mitigate potential steam ingestion into the RCIC suction strainer with suppression pool temperatures greater than 200°F, procedural controls were implemented to restrict operation of the 'K' SRV when RCIC is being operated.

Attachment A
Comments on the NRC Safety Evaluation for LaSalle County Station

- NRC SE section 4.1.1.1(2) states that the proposed solution is to impose procedural controls within the emergency operating procedures (EOPs) to limit the RPV cooldown rate. We have imposed procedural controls within the EOPs and LaSalle Abnormal Procedures (LOAs).

4. NRC SE Section 4.1.4, "Generic Letter 89-10 Program"

Comment

NRC SE Section 4.1.4 references a letter dated April 9, 2000. This appears to be typographical error for the ComEd April 7, 2000 submittal.

5. NRC SE Section 4.3, "ECCS Performance Evaluation"

Comment

NRC SE Section 4.3 identifies NRC Reference 4 as the power uprate Loss of Coolant Accident (LOCA) analysis. NRC SE Reference 4 is the Topical Report for LOCA analysis for General Electric Company (GE) fuel.

LaSalle County Station, Units 1 and 2, currently have both GE and Siemens Power Corporation (Siemens) fuels. The LOCA analysis for power uprate is EXEM-BWR, "Advanced Nuclear Fuels Corporation Methodology for Boiling Water Reactors EXEM BWR Evaluation Model, ANF-91-048(P)(A)," Advanced Nuclear Fuels Corporation, January 1993. The current fuel cycles for both Units 1 and 2 were analyzed for power uprate for both GE fuel and Siemens fuel. This was discussed in Attachment A, Section F of Reference 1.

Attachment A
Comments on the NRC Safety Evaluation for LaSalle County Station

6. NRC SE Section 4.6, "Main Steam Isolation Valve Leakage Control System"

Comment

ComEd in Reference 1, identified that the Main Steam Isolation Valve Leakage Control System was deleted from LaSalle County Station. As described in Reference 1, Attachment E, Section 4.6, doses due to MSIV leakage are evaluated in Section 9.2 of Attachment E.

7. NRC SE Section 6.3, "Spent Fuel Pool Cooling System"

Comment

NRC SE Section 6.3 states that the licensee has an existing procedure governing the use of the B loop of Residual Heat Removal (RHR) System in the event that the calculated heat load in the Spent Fuel Pool (SFP) would cause the SFP water temperature to exceed 150°F.

The LaSalle County Station procedure governing the use of the B loop of RHR is not based on SFP water temperature. In Reference 4, the response to Questions 8 states that a procedure is in place to institute the RHR Fuel Pool Cooling Assist Mode, if required, on loss of both Units' Fuel Pool Cooling and Cleanup System (FPCCS).

8. NRC SE Section 9.3.1, "Anticipated Transients Without Scram (ATWS)"

Comment

NRC SE Section 9.3.1 discusses the acceptance criteria required for the ATWS event as Supplement 1 to NRC Reference 2. NRC Reference 2 is GE Nuclear Energy, "Generic Evaluations of General Electric Boiling Water Reactor Power Uprate," and Supplements 1 and 2. Supplement 2 is the correct reference for LaSalle County Station.

Attachment A
Comments on the NRC Safety Evaluation for LaSalle County Station

9. NRC SE Section 9.3.2, "Station Blackout"

Comment

NRC SE Section 9.3.2 identifies that the plant response and coping capabilities for a station blackout (SBO) event are impacted slightly by plant operations at the proposed power level due to the increase in the operating temperature of the primary coolant system, decay heat, and main steam safety/relief valve set points.

In Reference 1, Attachment E, Section 9.3.2 identifies that plant response and coping capabilities for a SBO event are affected slightly by operation at the uprated power level due to the increase in decay heat.

10. NRC SE Section 10.5.3, "Effect of Power Uprate on Control Room Alarms, Controls, and Displays"

Comment

NRC SE Section 10.5.3 states that one alarm response procedure will be affected by the power uprate. LaSalle County Station has changed several alarm response procedures for power uprate.

11. NRC SE Section 11.0, "Maine Yankee Lessons Learned"

Comment

NRC SE Section 11.0 stated that the ComEd letter dated January 21, 2000 also confirmed that the licensee audited GE to assure that the codes are used correctly by GE for power uprate conditions and the limitations and restrictions were followed appropriately by GE. Additionally, it stated that the main findings centered around the use and applicability of the code methodologies used to support the uprated power and that the licensee has verified that the codes are appropriate and applicable to the plant given the uprated conditions.

In Reference 5, the response to Question 1c identified that in a telephone conference call on November 9, 1999, it was stated to the NRC that ComEd has not audited GE specifically to ensure that codes are used correctly by General Electric for the LaSalle County Station power uprate conditions. However, the code results as applied to the

Attachment A
Comments on the NRC Safety Evaluation for LaSalle County Station

power uprate evaluations have received extensive technical reviews to ensure that code output results are valid and accurate. Additionally, it was stated that ComEd periodically audits GE as required by the ComEd QA program and as a result of participation in BWR Owner's Groups and NUPIC audits.

12. NRC Cover letter, Section 1.A of Unit 1 Amendment 140, Section 1.A of Unit 2 Amendment 125, and NRC SE Section 1

Comment

There appears to be a typographical error in that only one of two March 24, 2000 submittals are listed.