

Commonwealth Edison Company
LaSalle Generating Station
2601 North 21st Road
Marseilles, IL 61341-9757
Tel 815-357-6761



August 11, 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: Supplement to Application for Amendment to Appendix A,
Technical Specification, Section 3/4.8.1, A.C.
Sources-Operating

Reference: Letter from C. G. Pardee (Commonwealth Edison (ComEd)
Company) to U.S. NRC, "Application for Amendment to
Appendix A, Technical Specifications, Section 3/4.8.1, A.C.
Sources – Operating," dated May 1, 2000.

In the Referenced letter, we proposed changes, for Units 1 and 2, to Technical Specification (TS) Section 3/4.8.1, that add a footnote to Surveillance Requirement (SR) 4.8.1.1.2.d.8 regarding the Emergency Diesel Generators (EDGs) 24-hour functional test. The proposed changes will permit EDG functional testing during power operation. During a conference call on July 21, 2000, the NRC requested the following:

1. Provide a commitment to include a requirement in applicable procedures to not perform the EDG 24-hour surveillance test during forecasted severe weather or unstable electrical grid conditions.

We will add a requirement, to each of the EDG's 24-hour run surveillance procedures, to not perform the EDG 24-hour surveillance test during forecasted severe weather or unstable electrical grid conditions.

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2. Address the effect on the Division 3 EDG when the Division 3 electrical bus picks up the High Pressure Core Spray (HPCS) pump if an Emergency Core Cooling System (ECCS) signal is received during the 24-hour run surveillance.
3. In accordance with a verbal request from the NRC, proposed footnote * for TS SR 4.8.1.1.2.d.8, second sentence is changed to state the following (changing "will" to "shall"):

"Should any of the required diesel generators become inoperable, the test shall be aborted."

The referenced submittal Attachment A, Section E; and Attachment B, Inserts A for the Unit 1 and Unit 2 proposed TS, are affected.

The attachment to this letter provides our response to the second request.

The no significant hazards consideration, submitted in the above Reference, remains valid for the information provided in this letter and attachment.

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,



Charles G. Pardee
Site Vice President
LaSalle County Station

Attachment

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

Attachment
Supplement to Application for Amendment to Appendix A, Technical Specifications, Section 3/4.8.1, "A.C. Sources – Operating

2. NRC Request

Address the effect on the Division 3 Emergency Diesel Generator when the Division 3 electrical bus picks up the High Pressure Core Spray (HPCS) pump if an Emergency Core Cooling System (ECCS) signal is received during the 24-hour run surveillance.

Response

When running in parallel with the electrical transmission/distribution grid (grid), droop is used to divide and balance the loads between the emergency diesel generator (EDG) and the grid. This results in stable sharing of both kilowatt (kW) load and volt ampere reactive (VAR) load.

The EDG Governor droop is the decrease in diesel speed taking place when the governor output shaft moves from the minimum to the maximum fuel position in response to a load increase, expressed as a percentage of rated speed. The diesel will gradually reduce its speed as load is applied. This relationship between load and speed acts as a resistance to load changes when the unit is interconnected with other units either electrically or mechanically, and results in stable kW sharing between the EDG and the grid.

In a similar manner, the voltage regulators have a droop circuit that allows paralleled generators to share reactive load and reduce circulating reactive currents, and also to proportionally share inductive loads by causing a decrease in the generator output voltage. This allows for stable VAR sharing between the diesel generator and the grid. This droop circuitry is automatically applied based on auxiliary contacts in the breaker logic.

Anytime a LaSalle EDG is going to be operated in parallel with the grid, the governor droop is set to 50, which is approximately 2%. In the event an EDG was operating in parallel with the grid at full load, any increase in load on the engine would tend to reduce the speed. Since the EDG is in parallel with the grid, speed can not decrease, so the effect is that the load is transferred to the grid. If a HPCS pump were started while its EDG was in parallel with the grid, droop would cause the additional load to be picked up by the grid.

This was tested during preoperational testing for the Division 3 EDGs. The EDGs continued to run as designed with the HPCS pump running as required. This test satisfied Final Safety Analysis Report (FSAR) section 14.2-34, "Diesel-Generators and Auxiliaries Preoperational Test," Objective number 8:

"The test will demonstrate the capability of the diesel-generator unit to supply emergency power within the required time and that this will not be impaired during periodic testing."

The preoperational test met the requirements of Regulatory Guide 1.108, "Periodic Testing of Diesel Generator Units Used as Onsite Electric Power Systems at Nuclear Power Plants," dated August 1976, Section C.2.a.(8).