

Attachment B

Proposed changes to Appendix A, Technical Specifications of Facility Operating Licenses NPF-18 and NPF-11.

Revised Pages

Unit 1 (NPF-11)

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Unit 2 (NPF-18)

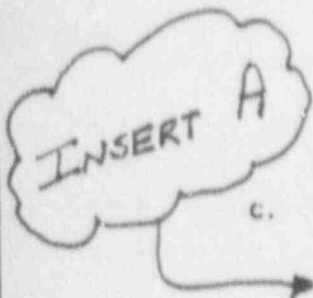
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REACTIVITY CONTROL SYSTEM

LIMITING CONDITION FOR OPERATION (Continued)

ACTION (Continued)

2. If the inoperable control rod(s) is inserted:
 - a) Within 1 hour disarm the associated directional control valves* either:
 - 1) Electrically, or
 - 2) Hydraulically by closing the drive water and exhaust water isolation valves.
 - b) Otherwise, be in at least HOT SHUTDOWN within the next 12 hours.
3. The provisions of Specification 3.0.4 are not applicable.
 - c. With more than 8 control rods inoperable, be in at least HOT SHUTDOWN within 12 hours.



SURVEILLANCE REQUIREMENTS

4.1.3.1.1 The scram discharge volume drain and vent valves shall be demonstrated OPERABLE by:

- a. At least once per 31 days verifying each valve to be open**, and
- b. At least once per 92 days cycling each valve through at least one complete cycle of full travel.

4.1.3.1.2 When above the low power setpoint of the RWM and RSCS, all withdrawn control rods not required to have their directional control valves disarmed electrically or hydraulically shall be demonstrated OPERABLE by moving each control rod at least one notch:

- a. At least once per 7 days, and
- b. At least once per 24 hours when any control rod is immovable as a result of excessive friction or mechanical interference.

4.1.3.1.3 All control rods shall be demonstrated OPERABLE by performance of Surveillance Requirements 4.1.3.2, 4.1.3.4, 4.1.3.5, 4.1.3.6 and 4.1.3.7.

*May be rearmed intermittently, under administrative control, to permit testing associated with restoring the control rod to OPERABLE status.

**These valves may be closed intermittently for testing under administrative control.

REACTIVITY CONTROL SYSTEM

SURVEILLANCE REQUIREMENTS (Continued)

4.1.5.1.4 The scram discharge volume shall be determined OPERABLE by demonstrating:

- a. The scram discharge volume drain and vent valves OPERABLE, when control rods are scram tested from a normal control rod configuration of less than or equal to 50% ROD DENSITY at least once per 18 months* by verifying that the drain and vent valves:
 1. Close within 30 seconds after receipt of a signal for control rods to scram, and
 2. Open after the scram signal is reset.
- b. Proper float response by performance of a CHANNEL FUNCTIONAL TEST of the scram discharge volume scram and control rod block level instrumentation after each scram from a pressurized condition.

*The provisions of Specification 4.0.4 are not applicable for entry into OPERATIONAL CONDITION 2 provided the surveillance is performed within 12 hours after achieving less than or equal to 50% ROD DENSITY.

INSERT A

- d. With one scram discharge volume vent valve and/or one scram discharge volume drain valve inoperable and open, restore the inoperable valve(s) to OPERABLE status within 24 hours or be in at least HOT SHUTDOWN within the next 12 hours.
- e. With any scram discharge volume vent valve(s) and/or any scram discharge volume drain valve(s) otherwise inoperable, restore the inoperable valve(s) to OPERABLE status within 8 hours or be in at least HOT SHUTDOWN within the next 12 hours.

REACTIVITY CONTROL SYSTEM

LIMITING CONDITION FOR OPERATION (Continued)

ACTION (Continued)

2. If the inoperable control rod(s) is inserted:
 - a) Within 1 hour disarm the associated directional control valves* either:
 - 1) Electrically, or
 - 2) Hydraulically by closing the drive water and exhaust water isolation valves.
 - b) Otherwise, be in at least HOT SHUTDOWN within the next 12 hours.
3. The provisions of Specification 3.0.4 are not applicable.
 - c. With more than 8 control rods inoperable, be in at least HOT SHUTDOWN within 12 hours.

INSERT A

SURVEILLANCE REQUIREMENTS

4.1.3.1.1 The scram discharge volume drain and vent valves shall be demonstrated OPERABLE by:

- a. At least once per 31 days verifying each valve to be open**, and
- b. At least once per 92 days cycling each valve through at least one complete cycle of full travel.

4.1.3.1.2 When above the low power setpoint of the RWM and RSCS, all withdrawn control rods not required to have their directional control valves disarmed electrically or hydraulically shall be demonstrated OPERABLE by moving each control rod at least one notch:

- a. At least once per 7 days, and
- b. At least once per 24 hours when any control rod is immovable as a result of excessive friction or mechanical interference.

4.1.3.1.3 All control rods shall be demonstrated OPERABLE by performance of Surveillance Requirements 4.1.3.2, 4.1.3.4, 4.1.3.5, 4.1.3.6, and 4.1.3.7.

*May be rearmed intermittently, under administrative control, to permit testing associated with restoring the control rod to OPERABLE status.

**These valves may be closed intermittently for testing under administrative control.

REACTIVITY CONTROL SYSTEM

SURVEILLANCE REQUIREMENTS (Continued)

4.1.3.1.4 The scram discharge volume shall be determined OPERABLE by demonstrating:

a. The scram discharge volume drain and vent valves OPERABLE, when control rods are scram tested from a normal control rod configuration of less than or equal to 50% ROD DENSITY at least once per 18 months* by verifying that the drain and vent valves:

1. Close within 30 seconds after receipt of a signal for control rods to scram, and
2. Open after the scram signal is reset.

b. Proper float and level sensor response by performance of a CHANNEL FUNCTIONAL TEST of the scram discharge volume scram and control rod block level instrumentation at least once per 31 days.

*The provisions of Specification 4.0.4 are not applicable for entry into OPERATIONAL CONDITION 2 provided the surveillance is performed within 12 hours after achieving less than or equal to 50% ROD DENSITY.

INSERT A

- d. With one scram discharge volume vent valve and/or one scram discharge volume drain valve inoperable and open, restore the inoperable valve(s) to OPERABLE status within 24 hours or be in at least HOT SHUTDOWN within the next 12 hours.
- e. With any scram discharge volume vent valve(s) and/or any scram discharge volume drain valve(s) otherwise inoperable, restore the inoperable valve(s) to OPERABLE status within 8 hours or be in at least HOT SHUTDOWN within the next 12 hours.

Attachment C

Evaluation of Significant Hazards Consideration

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, operation of LaSalle County Station Units 1 and 2 in accordance with the proposed amendment will not:

- 1) Involve a significant increase in the probability or consequences of an accident previously evaluated because:

The establishment of an allowed outage time (AOT) for the scram discharge volume (SDV) vent and drain valve will not significantly increase the probability of an accident previously evaluated. The proposed AOT introduces a minor increase in the risk of a loss of coolant via the SDV vent and/or drain valve pathway. However, this event can only occur if the redundant valve should fail to close after a reactor scram. The probability of such an event is reduced by the use of redundant valves in the pathway. Therefore, the proposed AOT does not involve a significant increase in the probability of an accident as previously evaluated for LaSalle Station.

The consequences of an accident previously evaluated are not significantly increased by creating the AOT for the SDV vent and drain valve. As previously mentioned, the proposed AOT for the SDV system increases the risk of a loss of coolant via the SDV vent and/or drain valve pathway. However, the volume of coolant lost via this pathway is relatively small. Also, this event can only occur following a reactor scram. The primary concern associated with a SDV vent and/or drain valve failure to close following a reactor scram is secondary containment contamination. Therefore, the consequences of an accident previously evaluated is not significantly increased.

If any of the SDV vent or drain valves fail closed the SDV will fill as a result of normal control rod drive leakage. The increasing level will cause successively an alarm, a control rod block and finally a reactor scram if action is not taken to reopen the valves and drain the SDV. The reactor scram will occur while there is still enough volume remaining in the SDV to ensure a full reactor scram. Therefore the ability to shut the reactor down under this failure mode is not impaired.

Deletion of Specification 4.1.3.1.4.b which contains the channel functional test requirements for SDV level detector instruments does not increase the probability or consequences of a previously evaluated accident. The requirements are either obsolete or redundant to other technical specification requirements.

- 2) Create the possibility of a new or different kind of accident from any accident previously evaluated because:

The establishment of an AOT does not involve any changes to the facility or the operation of the facility as described in the UFSAR.

Surveillance requirements for the SDV level instrumentation are covered under the RPS and control rod block instrumentation Technical Specification requirements.

Attachment C

Evaluation of Significant Hazards Consideration (Cont.)

- 3) Involve a significant reduction in the margin of safety because:

Establishment of an AOT where none currently exists may result in a small increase in risk, however it is expected that this increase will be offset by the reduction of risk to plant safety resulting from a reduced number of unnecessary plant shutdowns.

The surveillance requirements for the SDV level instruments are adequately addressed in the RPS and control rod block instrumentation specifications. Therefore deletion of specification 4.1.3.1.4.b will not reduce the margin of safety.

Guidance has been provided in "Final Procedures and Standards on No Significant Hazards Considerations," Final Rule, 51 FR 7744, for the application of standards to license change requests for determination of the existence of significant hazards considerations. This document provides examples of amendments which are and are not considered likely to involve significant hazards considerations. This proposed amendment does not involve a significant relaxation of the criteria used to establish safety limits, a significant relaxation of the bases for the limiting conditions for operations. Therefore, based on the guidance provided in the Federal Register and the criteria established in 10 CFR 50.92(e), the proposed change does not constitute a significant hazards consideration.

Attachment D

Environmental Assessment Statement Applicability Review

Commonwealth Edison has evaluated the proposed amendment against the criteria for the identification of licensing and regulatory actions requiring environmental assessment in accordance with 10 CFR 51.21. It has been determined that the proposed change meets the criteria for a categorical exclusion as provided for under 10 CFR 51.22(c)(10). This determination is based on the fact that this change is being proposed as an amendment to a license issued pursuant to 10 CFR 50. This proposed change involves no significant hazards consideration or a significant change in the types or significant increase in the amounts of any effluents that may be released offsite. In addition, this amendment request does not involve a significant increase in individual or cumulative occupational radiation exposure.