



Commonwealth Edison
1400 Opus Place
Downers Grove, Illinois 60515

September 21, 1990

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

Subject: LaSalle County Station Units 1 and 2
Application for Amendment to Facility
Operating Licenses NPF-11 and NPF-18
Appendix A, Technical Specifications
NRC Docket Nos. 50-373 and 50-374

Dear Sirs:

Pursuant to 10CFR 50, Commonwealth Edison's LaSalle County Station is hereby applying for an amendment to Facility Operating Licenses NPF-11 and NPF-18 Appendix A, Technical Specifications. The purpose of this amendment request is to extend the requirements of Technical Specification 3/4.8.3.2 for Primary Containment Penetration Conductor Overcurrent Protection Devices to circuit breakers recently installed for the drywell cooling modifications.

Attachment A contains background information and justification for the proposed change. Attachment B contains the proposed changes to the Technical Specifications. The proposed change has been reviewed and approved by both on-site and off-site review in accordance with Commonwealth Edison Company Procedures. This amendment request has been evaluated in accordance with 10 CFR 50.92 (c) and was determined that no significant hazards consideration exists. That evaluation is documented in Attachment C.

Commonwealth Edison is notifying the State of Illinois of our application for this amendment by transmitting a copy of this letter and its attachments to the designated State Official.

Please direct any questions you may have regarding this matter to this office.

Very Truly Yours,

Wayne E. Morgan

W.E. Morgan
Nuclear Licensing Administrator

cc: Regional Administrator, RIII
Robert Pulsifer - Project Manager NRR
Senior Resident Inspector - LaSalle
Office of Nuclear Facility - IDNS

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ATTACHMENT A

Technical Specification Change Request

LaSalle County Station Units 1 and 2

Background and Discussion

BACKGROUND

Modifications M-1-1-84-074 and M-1-2-84-119 installed six cooling units in the upper regions of the Unit 1 and Unit 2 drywells. These modifications were installed as part of a commitment to the NRC to restore design redundancy to the drywell ventilation system. This proposed amendment to the Unit 1 and Unit 2 Technical Specifications is requested to extend the requirements of Technical Specification 3/4.8.3.2 to the primary containment penetration conductor overcurrent protective devices associated with the new cooling units.

DISCUSSION

Currently, all 6.9 KV, 4.16 KV and 480 volt electrical penetrations into the primary containment are protected by either:

- de-energizing those circuits not required during reactor operation, or
- by demonstrating the operability of the primary and backup overcurrent protection circuit breakers, associated with an electrical penetration, by periodic surveillance testing.

The limiting conditions for operation contained in Technical Specification 3/4.8.3.2, "Primary Containment Penetration Conductor Overcurrent Protective Devices," require that all protective devices, shown in Table 3.8.3.2-1, be operable in operational conditions 1, 2, and 3. If one or more of the protective devices in any of these penetrations are found to be inoperable, the LCO requires that the affected penetration(s) be de-energized. The surveillance requirements of this technical specification require that a test program be established to select and test a representative sample (at least 10%) of each type of breaker on a rotating basis such that all of the breakers listed are tested periodically. Additionally, the specification requires that the sample size be increased if any failures occur. In addition to the test program, it is required that each circuit breaker be periodically subjected to an inspection and preventive maintenance program as recommended by the breaker manufacturer.

In order to ensure that the new overcurrent protective devices associated with the new cooling units are properly controlled and tested, it is proposed that the following listed breakers, be added to Table 3.8.3.2-1, of the technical specifications:

- | | | |
|----|-----------------------------|--------------------------------|
| 1) | MCC 1 (2) 34X-2 (Compt. H1) | VP/Drywell Cooler 1 (2) VP15SB |
| 2) | MCC 1 (2) 34X-2 (Compt. H2) | VP/Drywell Cooler 1 (2) VP15SC |
| 3) | MCC 1 (2) 34X-2 (Compt. J1) | VP/Drywell Cooler 1 (2) VP15SF |
| 4) | MCC 1 (2) 33-2 (Compt. AC1) | VP/Drywell Cooler 1 (2) VP15SA |
| 5) | MCC 1 (2) 33-2 (Compt. AP2) | VP/Drywell Cooler 1 (2) VP15SD |
| 6) | MCC 1 (2) 33-2 (Compt. AB1) | VP/Drywell Cooler 1 (2) VP15SE |

Currently, the following administrative controls are in effect to ensure that the above listed circuit breakers are properly controlled in accordance with Technical Specification 3/4.8.3.2.

- 1) Direction has been given to the station operating staff in accordance with Station Procedure LAP-1600-1, "Special Operating Orders," to apply the requirements of Technical Specification 3/4.8.3.2. to the control of the above listed breakers. These special orders will be renewed semi-annually in accordance with the procedure until approval of the technical specification amendment is received.
- 2) The applicable station surveillance procedures have been revised to include the above listed circuit breakers in the test program for primary containment penetration protective devices.

These administrative controls will remain in effect until approval of this amendment request.