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Downers Grove, Illinois 60515

April 16, 1990

Dr. Thomas E. Murley, Director  
ATTN: Document Control Desk  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Subject: LaSalle County Station Units 1 and 2  
Proposed Amendment to Technical  
Specification for Facility Operating  
License Nos. NPF-11 and NPF-18  
NRC Docket Nos 50-373 and 50-374

Reference: (a) See Attachment D

Dear Dr. Murley:

Pursuant to 10 CFR 50.90, Commonwealth Edison Company (CECo) is hereby applying for an amendment to Facility Operating License Nos. NPF-11 and NPF-18, Appendix A, Technical Specifications. The purpose of this Technical Specification change is to clarify the Testing Requirements for the Charcoal Absorber Beds and HEPA Filters of the Standby Gas Treatment (VG) and the Control Room (VC) Emergency Filtration System and Supply Filter unit.

Attachment A contains background information and justification for the proposed change. Attachment B contains the proposed changes to the Technical Specifications. The proposed changes have been reviewed and approved by both On-Site and Off-Site Review committees in accordance with Commonwealth Edison Company procedures. This amendment request has been evaluated in accordance with 10 CFR 50.92(c) and it was determined that no significant hazards consideration exists. That evaluation is documented in Attachment C. Attachment D lists other documents referenced in this submittal.

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

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Dr. T.E. Murley

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April 16, 1990

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

Attachments

cc: R. Pulsifer - Project Manager, NRR  
A.B. Davis - Regional Administrator, RIII  
Senior Resident Inspector - LaSalle  
Office of Facility Safety - IDNS

/lmw:0513T

## ATTACHMENT A

### TECHNICAL SPECIFICATION CHANGE REQUEST

#### LASALLE COUNTY STATION UNITS 1 AND 2

#### BACKGROUND:

On May 26, 1989, it was determined that the Technical Specification requirements for laboratory testing of the Standby Gas Treatment System (VG) and Control Room (VC) charcoal adsorption beds had not been met during the testing of charcoal samples in 1985. The Technical Specification requirements had been misinterpreted and consequently improperly incorporated into the station procedures. An investigation was conducted and the station issued LER No. 89-019-00 (Reference k) to document the incident to ensure that all applicable Technical Specification and regulatory requirements were met. As part of the corrective actions for this event, CECO committed to revise the LaSalle County Station Technical Specifications to clarify the testing requirements for the charcoal adsorption beds. This document fulfills that commitment.

#### DISCUSSION:

Currently, the LaSalle Technical Specifications (Specifications 3/4.6.5.3 and 3/4.7.2) reference the requirements of Regulatory Guide 1.52, Revision 2, March 1978 (Reference e) for both the sampling requirements and laboratory testing criteria. Regulatory Guide 1.52 recommends the use of industry standard ANSI N509-1976 (Reference d) to provide design sampling and testing requirements for the air cleaning units. For laboratory testing protocols, this standard refers to ANSI N510-1975 (Reference c) which in turn requires use of test procedure RDT M16-1T (Reference b). An update of ANSI N510 in 1980 changed the laboratory testing requirements to ASTM D3803 (Reference f) which is currently the accepted industry standard for testing of charcoal adsorption beds.

In NRC Information Notice 87-32 (Reference i), the NRC indicated that certain deficiencies may exist in the testing methodology of the ASTM Standard and has recommended that certain revisions be made to the standard. In Reference 1, Page 20, the NRC further states that the ASTM Standard is currently under revision to incorporate the NRC recommendations into the standard. As a result, the ASTM protocol is likely to remain the accepted industry standard for charcoal testing either in the current or revised form. LaSalle County Station is proposing that the Technical Specifications be amended to refer directly to the laboratory testing protocols of the ASTM Standard.



Also being proposed is that the acceptance criteria for these tests be revised to be consistent with the proposed action levels contained in Table 1. (The Table was developed with input from NRC staff members.) The acceptance criteria provided in the Table is the same as or more conservative than the requirements of Generic Letter No. 83-13 (Action Level I). The table provides for remedial actions if the acceptance criteria is not met. Action Levels I and II ensure that the Technical Specification LCO action level (Action Level III), and thereby the dose calculation basis, is not exceeded. These provisions provide the flexibility to plan and prepare for remedial action before entering an LCO. Commonwealth Edison Company will incorporate these action levels into the station procedures following approval of this amendment.

Additionally, LaSalle County Station is proposing that references to the auxiliary electric equipment room (AEER) emergency filtration system and the control room supply recirculating charcoal filter, "odor eater", be removed from the Technical specifications for the following reasons.

AEER Emergency Filtration System - GDC 19 provides the general requirements for the control room design and for maintenance of the control room environment. GDC 19 requires that a control room be provided from which the plant can be operated and maintained in a safe condition under normal and abnormal conditions. Measures are required to ensure the habitability of the control room under accident conditions. At LaSalle Station the outside air supply for the AEER air conditioning system comes from the VC system minimum outside air inlet damper. When the VC emergency filtration system runs, it supplies air to both the VC and AEER system. Although the AEER and Control Room share the same air supply systems, the Control Room envelope and the AEER envelope are independent and are in physically separated areas inside the plant. GDC 19 further requires that equipment be provided in areas outside of the control room to provide for the capability of a remote shutdown of the unit. Since the AEER is not required to be occupied for safe plant operation, except in the case of a remote shutdown, the habitability requirements of GDC 19 are not applicable to the AEER.

On Piping and Instrumentation Diagram (P&ID) M-1443-1 the "Control Room and Auxiliary Electric Equipment Room Emergency Filtration System" is referred to as the "Control Room HVAC Emergency Make-up Air Filter Unit". In this description no reference to the AEER is made, therefore to avoid confusion to the station operators it is being proposed that the Technical Specification nomenclature be revised to delete any reference to the AEER. This will then coincide with the station P&ID's.

Control Room Recirculating Charcoal Filter - A current calculation (Reference n) of the design-basis post accident radiological doses in the plant's main control room has shown that the radiological doses calculated were all within applicable regulatory criteria.

Since it has been shown in this calculation that the recirculating charcoal filter is not required to maintain control room habitability under accident conditions, it is proposed that the references to this filter be removed from the Technical Specifications.

#### SUMMARY

This submittal proposes that the Technical Specification be amended:

- 1) to reference the current industry standards for laboratory testing of charcoal adsorption bed samples;
- 2) to revise and clarify the acceptance criteria for laboratory tests of the charcoal adsorption bed samples;
- 3) to eliminate the references in the Technical Specifications to the AEER emergency filtration system;
- 4) to eliminate the references in the Technical Specifications to the control room recirculating charcoal filter ("odor eater"); and
- 5) to revise the Technical Specifications nomenclature "Control Room and Auxiliary Electric Equipment Room Emergency Filtration System" by deleting any reference to the AEER. This will then coincide with the nomenclature referenced in the station P&ID's. "Control Room HVAC Emergency Make-up air filter unit".

TABLE 1

PROPOSED LABORATORY TESTING CRITERIA  
FOR CHARCOAL ADSORBER BED SAMPLES

	PERCENT PENETRATION	
	STANDBY GAS TREATMENT SYSTEM (8" BED)	CONTROL ROOM EMERGENCY FILTRATION SYSTEM (2" BED)
<u>ACTION LEVEL I</u>		
Procedural Initial Action Level (Refer to Notes 1 through 4)	≥ 0.175 %	≥ 2.0 %
<u>ACTION LEVEL II</u>		
Procedural Action Level (Refer to Note 5)	≥ 0.4 %	≥ 8.0 %
<u>ACTION LEVEL III</u>		
Technical Specification LCD Action Level (Refer to Note 6)	≥ 0.5 %	≥ 10.0 %
<u>DOSE ANALYSIS BASIS</u>	1.0 %	10.0 %

NOTES

1. If the periodic surveillance testing results are less than Action Level I penetration criteria for the filter of interest, no action is required.
2. If the periodic surveillance testing results are between Action Levels I and III penetration criteria, test another charcoal bed sample and verify the results within 45 days of receiving the initial test results.
3. If any of the retest results are less than the Action Level I penetration criteria, no further action is required.
4. If the results of the second test are between Action Levels I and II penetration criteria:
  - a. replace the charcoal bed or test another sample and verify the results are less than Level I penetration criteria within 92 days of receiving the previous test results.
  - b. if the results of the testing in note 4a are still between Action Levels I and II the testing specified in note 4a maybe repeated once.
5. If any of the charcoal bed retest results are between the Action Levels II and III criteria, replace the charcoal adsorption bed within 31 days
6. If any of the test sample results (initial or retest) are confirmed to be greater than or equal to the Action Level III penetration criteria, declare the system to be inoperable in accordance with the applicable technical specifications and follow the appropriate action statement and reporting requirements.