

ATTACHMENT B

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ATTACHMENT B

INSERT A:

- c. By sampling and analyzing stored and new fuel oil in accordance with the following:
 - 1. At least once per 92 days, and for new fuel oil prior to addition to the storage tanks, that a sample obtained and tested in accordance with the applicable ASTM Standards has:
 - a) A water and sediment content within applicable ASTM limits.
 - b) A kinematic viscosity at 40°C within applicable ASTM limits.
 - 2. At least every 31 days, and for new fuel oil prior to addition to the storage tanks, that a sample obtained in accordance with the applicable ASTM Standard has a total particulate contamination of less than 10 mg/l when tested in accordance with the applicable ASTM Standard.

ATTACHMENT B

INSERT B:

The tests listed below are a means of determining whether new fuel oil is of the appropriate grade and has not been contaminated with substances that would have an immediate, detrimental impact on diesel engine combustion/operation. If results from these tests are within acceptable limits, the fuel oil may be added to the storage tanks without concern for contaminating the entire volume of fuel oil in the storage tanks. The tests, limits, and applicable American Society for Testing Materials (ASTM) standards are as follows:

- a. Sample the new fuel oil in accordance with ASTM-D4057-88;
- b. Verify in accordance with the tests specified in ASTM-D975-88 that the sample has a water and sediment content of less than or equal to 0.05 volume percent and a kinematic viscosity at 40°C of greater than or equal to 1.9 but less than or equal to 4.1.
- c. Verify that the new fuel oil has a total particulate contamination of less than 10 mg/liter when tested in accordance with ASTM-D2276-89.

This surveillance is an integral part of a comprehensive program to ensure the availability of high quality fuel oil for the diesel generators at all times. By testing for particulate on a 31-day basis, information regarding the condition of stored fuel oil can be obtained and trended.

Fuel oil degradation during long term storage shows up an increase in particulate, due mostly to oxidation. The presence of particulate does not mean the fuel oil will not burn properly in a diesel engine. The particulate can cause fouling of filters and fuel oil injection equipment, however, which can cause engine failure. If particulate is removed from stored fuel oil by circulating to oil through filters (other than diesel engine filters), the fuel oil can be restored to acceptable condition and its storage life extended indefinitely. By obtaining and trending particulate data, it is possible to determine when stored fuel oil cleanup will be necessary. This is done before the maximum allowable particulate concentration is reached.

Particulate concentrations should be determined in accordance with ASTM-D2276-89, Method A. This method involves a gravimetric determination of total particulate concentration in fuel oil and has a limit of 10 mg/l. It is acceptable to obtain a field sample for subsequent lab testing in lieu of field testing. In the case(s) where the total stored fuel oil volume is contained in two or more interconnected tanks, each tank must be considered and tested separately.


INSERT B (CON'T):

The frequency of this surveillance takes into consideration fuel oil degradation trends that indicate that particulate concentration is unlikely to change between frequency intervals.

There is no quantitative data regarding the capability of diesel engines to operate for prolonged periods of time with fuel oil particulate contamination in excess of 10 mg/l. Therefore, if this limit is reached, the associated diesel generator shall be declared inoperable. In practice, however, this should not present a problem since the concept behind this surveillance requirement is to establish fuel oil degradation trends, which will provide an alert to the need for corrective action prior to impacting on diesel generator operability.

ELECTRICAL POWER SYSTEMS

SURVEILLANCE REQUIREMENTS

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6. Verifying the diesel generator is aligned to provide standby power to the associated emergency busses.
7. Verifying the pressure in all diesel generator air start receivers to be greater than or equal to 200 psig.
- b. At least once per 31 days and after each operation of the diesel where the period of operation was greater than or equal to 1 hour by checking for and removing accumulated water from the day fuel tanks.
- c. At least once per 92 days and from new fuel oil prior to addition to the storage tanks by verifying that a sample obtained in accordance with ASTM-D270-1975 has a water and sediment content of less than or equal to 0.05 volume percent and a kinematic viscosity @ 40°C of greater than or equal to 1.9 but less than or equal to 4.1 when tested in accordance with ASTM-D975-77, and an impurity level of less than 2 mg of insolubles per 100 ml when tested in accordance with ASTM-D2274-70.
- d. At least once per 18 months during shutdown by:
1. Subjecting the diesel to an inspection in accordance with procedures prepared in conjunction with its manufacturer's recommendations for this class of standby service.
 2. Verifying the diesel generator capability* to reject a load of greater than or equal to 1190 kW for diesel generator 0, greater than or equal to 638 kW for diesel generators 1A and 2A, and greater than or equal to 2421 kW for diesel generator 1B while maintaining engine speed less than or equal to 75% of the difference between nominal speed and the overspeed trip setpoint or 15% above nominal, whichever is less.
 3. Verifying the diesel generator capability* to reject a load of 2600 kW without tripping. The generator voltage shall not exceed 5000 volts during and following the load rejection.
 4. Simulating a loss of offsite power* by itself, and:
 - a) For Divisions 1 and 2 and for Unit 2 Division 2:
 - 1) Verifying de-energization of the emergency busses and load shedding from the emergency busses.

*All planned diesel generator starts performed for the purpose of meeting these surveillance requirements may be preceded by an engine prelube period, as recommended by the manufacturer.

3/4.8 ELECTRICAL POWER SYSTEMS

BASES

3/4.8.1 and 3/4.8.2 A.C. SOURCES and ONSITE POWER DISTRIBUTION SYSTEMS

The OPERABILITY of the A.C. and D.C. power sources and associated distribution systems during operation ensures that sufficient power will be available to supply the safety related equipment required for (1) the safe shutdown of the facility and (2) the mitigation and control of accident conditions within the facility. The minimum specified independent and redundant A.C. and D.C. power sources and distribution systems satisfy the requirements of General Design Criteria 17 of Appendix A to 10 CFR Part 50.

The ACTION requirements specified for the levels of degradation of the power sources provide restriction upon continued facility operation commensurate with the level of degradation. ACTION statements have been included in the specification to cover all situations where either one AC source or a combination of two AC sources are inoperable. ACTION statements c, e, and f are intended to be followed to completion once entered and should not be exited until both AC sources are restored. The OPERABILITY of the power sources are consistent with the initial condition assumptions of the accident analyses and are based upon maintaining at least Division I or II of the onsite A.C. and D.C. power sources and associated distribution systems OPERABLE during accident conditions coincident with an assumed loss of offsite power and single failure of one of the two onsite A.C. sources. Division III supplies the high pressure core spray (HPCS) system only.

The OPERABILITY of the minimum specified A.C. and D.C. power sources and associated distribution systems during shutdown and refueling ensures that (1) the facility can be maintained in the shutdown or refueling condition for extended time periods and (2) sufficient instrumentation and control capability is available for monitoring and maintaining the unit status.

The surveillance requirements for demonstrating the OPERABILITY of the diesel generators are in accordance with the recommendations of Regulatory Guide 1.9, "Selection of Diesel Generator Set Capacity for Standby Power Supplies," March 10, 1971, with the exception noted in Appendix B to the FSAR, and Regulatory Guide 1.108, "Periodic Testing of Diesel Generator Units Used as Onsite Electric Power Systems at Nuclear Power Plants," Revision 1, August 1977.

INSERT →
6 The diesel generators are equipped with a pre-lubrication system which maintains a continuous flow of oil to the diesel engine moving parts while the engine is shutdown. The purpose of this system is to increase long term diesel generator reliability by reducing the stress and wear caused by frequent dry starting of the diesel generator. The diesel generator pre-lube may be accomplished either through, normal operation of the installed pre-lubrication system, or by manual pre-lubrication of the diesel generator in accordance with manufacturers instructions. Performance of an idle start of the diesel generator is not considered to be a means of pre-lubrication.

ELECTRICAL POWER SYSTEMS

SURVEILLANCE REQUIREMENTS

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 1. Subjecting the diesel to an inspection in accordance with procedures prepared in conjunction with its manufacturer's recommendations for this class of standby service.
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 4. Simulating a loss of offsite power* by itself, and:
 - a) For Divisions 1 and 2 and for Unit 1 Division 2:
 - 1) Verifying de-energization of the emergency busses and load shedding from the emergency busses.

*All planned diesel generator starts performed for the purpose of meeting these surveillance requirements may be preceded by an engine prelube period as recommended by the manufacturer.

3/4.8 ELECTRICAL POWER SYSTEMS

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INSERT B → The diesel generators are equipped with a pre-lubrication system which maintains a continuous flow of oil to the diesel engine moving parts while the engine is shutdown. The purpose of this system is to increase long term diesel generator reliability by reducing the stress and wear caused by frequent dry starting of the diesel generator. The diesel generator pre-lube may be accomplished either through, normal operation of the installed pre-lubrication system, or by manual pre-lubrication of the diesel generator in accordance with manufacturers instructions. Performance of an idle start of the diesel generator is not considered to be a means of pre-lubrication.

ATTACHMENT C
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:
 - a) Replacing the sampling procedure ASTM-D270-1975, which has been discontinued but which is presently required by Technical Specifications, with the upgraded sampling procedure ASTM-D4057-88 will not adversely impact on the quality of the obtained diesel fuel oil sample or the analysis of the sample so as to affect the operability of the diesel generators.
 - b) Replacing the Technical Specification required procedure, "Standard Specification For Diesel Fuel Oils", ASTM-D975-77, with the updated ASTM-D975-88 Standard will not adversely impact on the quality of the analysis of the sample for water and sediment content, and kinematic viscosity so as to affect the operability of the diesel generators. The updated ASTM Standard offers the advantage of included guidance for long term storage of fuel oil. The inclusion of this guidance should provide for enhanced fuel oil control and maintenance, and continued reliable operation of the diesel generators.
 - c) Replacing the fuel oil test procedure, ASTM-D2274-70, currently required by Technical Specifications at least once per 92 days, with the updated ASTM-D2276-89 Standard will enhance the maintenance of acceptable fuel oil and the continued operability of the diesel generators. ASTM-D2276-89 is more effective in detecting unsatisfactory fuel oil and will be performed at least once per 31 days.

Referencing the updated applicable ASTM Standards in the Bases will allow the most current applicable Standards to be used without the need for a Technical Specification amendment. The 10 CFR 50.59 Safety Evaluation Screening and Station On-Site Review for a proposed change to ASTM Standards referenced in the Bases will assure up-to-date sampling technique and sample analysis methods to assure continued reliable operation of the diesel generators.

Since the acceptable fuel quality under the current specification will be maintained or even upgraded by this proposed amendment, the reliability of diesel generator operation will not be affected. Thus the initial assumptions of the accidents previously analyzed are not affected.

ATTACHMENT C
SIGNIFICANT HAZARDS CONSIDERATION
(continued)

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

This proposed Technical Specification Amendment does not create the possibility of a new or different accident from any accident previously evaluated. The upgraded ASTM Standard, ASTM-D975-88, will maintain fuel oil sample quality and fuel oil acceptance criteria. The intended purpose and use of the diesel generators and auxiliary equipment remains the same, and the safe and reliable operation of this equipment is maintained.

Therefore, this proposed amendment will replace present ASTM Standards with updated applicable Standards which will neither create the possibility of a new and different kind of accident, nor adversely impact on any previous accident evaluations. Diesel generator reliability is maintained.

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

- a) This proposed amendment maintains fuel oil sample quality and fuel oil acceptance criteria. The safe and reliable operation of the diesel generators is maintained.
- b) This proposed amendment increases the surveillance for the detection of particulate contamination in fuel oil from quarterly to monthly. Severe degradation of the fuel oil which could affect diesel engine performance would be detectable during the periodic tests which are performed at least once per 31 days.

Therefore this proposed amendment does not involve a significant reduction in 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. These proposed amendments most closely fit the example of a change that constitutes an additional limitation, restriction, or control not presently included in the Technical Specifications.

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 safety system settings or 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(c), the proposed change does not constitute a significant hazards consideration.

ATTACHMENT D

ENVIRONMENTAL ASSESSMENT STATEMENT APPLICABILITY REVIEW

Commonwealth Edison has evaluated the proposed changes against the criteria for the identification of licensing and regulatory actions requiring environmental assessment in accordance with 10 CFR 51.20. It has been determined that the proposed changes meet the criteria for a categorical exclusion as provided under 10 CFR 51.22(c)(9). This conclusion has been determined because the proposed changes do not pose a significant hazards consideration or do not involve a significant increase in the amounts, and no significant changes in the types, of effluents that may be released offsite. This request does not involve a significant increase in individual or cumulative occupational radiation exposure. Therefore, the Environmental Assessment Statement is not applicable for these changes.