



Commonwealth Edison
One First National Plaza, Chicago, Illinois
Address Reply to: Post Office Box 767
Chicago, Illinois 60690

April 29, 1982

Mr. A. Schwencer, Chief
Licensing Branch #2
Division of Licensing
U. S. Nuclear Regulatory Commission
Washington, DC 20555



Subject: LaSalle County Station Units 1 and 2
Interpretation of Technical
Specifications - Reporting Requirements
when Special Reports are Indicated in
Action Statements
NRC Docket Nos. 50-373 and 50-374

Reference (a): LaSalle County Station License NPF-11
Appendix "A", Technical Specifications.

Dear Mr. Schwencer:

The purpose of this letter is to provide Commonwealth Edison Company's interpretation of the Technical Specification reporting requirements for situation in which a Special Report is indicated in Action Statements. It is requested that you review this interpretation and provide Commonwealth Edison with an official NRC interpretation of this subject. LaSalle County Station will continue operations based on the following interpretation until we receive your official position.

There are numerous Technical Specifications which contain action statements such as:

"If the system is not returned to operable within x days, in lieu of any other report required by Specification 6.6.A or 6.6.B, prepare and submit to the Commission within the next 30 days, pursuant to Specification 6.6.C, a Special Report outlining certain information. The provisions of Specifications 3.0.3 and 3.0.4 are not applicable."

Attachment A is a list of examples of specifications that are worded in this fashion. A review of Attachment A reveals that these are Technical Specifications related to Non-Safety Related systems or programs.

8205070272 820429
PDR ADOCK 05000373
P PDR

Boo
5/1

April 29, 1982

In various meetings with the NRC Staff over the last several years, Commonwealth Edison personnel were given the impression that, although these systems were not safety-related, the NRC Staff wanted to assure that they would be operable and generally available if required. One method of accomplishing this was to require the writing of a Special Report in lieu of any other reporting requirements. The staff considered such reports "sufficiently onerous" as to persuade the licensee to maintain his equipment and programs operable without need or justification for limitation of plant operations (thus Specifications 3.0.3 and 3.0.4 are not applicable).

Commonwealth Edison Company interprets this wording to mean that, if a system is inoperable but is restored to operation within the specified time period in the action statement, no report to the NRC is required. If the system is not returned to operable within the specified time period, a Special Report shall be submitted within the specified timeframe in lieu of any other report required by Specification 6.6.A or 6.6.B.

As an example, refer to Specification 3.11.3 (which is enclosed as Attachment B to this letter). If the radwaste solidification system was inoperable for 25 days and returned to service, no report of any kind would be required. If the radwaste solidification system was inoperable for 32 days, a 30 day time clock would have started at the end of 31 days for the submission of only a Special Report, pursuant to Specification 6.6.C.

If there are any further questions in this matter, please contact this office.

One (1) signed original and thirty-nine (39) copies of this letter are provided for your use.

Very truly yours,

CW Schroeder 4/30/82

C. W. Schroeder
Nuclear Licensing Administrator

1m

Attachment

cc: Resident Inspector - LaSalle

4014N

ATTACHMENT A

- 3.3.7.2 Seismic Monitoring Instrumentation
- 3.3.7.3 Meteorological Monitoring Instrumentation
- 3.3.7.9 Fire Detection Instrumentation
- 3.3.7.12 Loose-Part Detection System
- 3.7.5.1 Fire Suppression Water System
- 3.7.5.2 Deluge and/or Sprinkler System
- 3.7.5.3 CO₂ Systems
- 3.7.5.4 Fire Hose Stations
- 3.7.6 Fire Rated Assemblies
- 3.7.7 Area Temperature Monitoring
- 3.11.1.2 Radioactive Effluents - Dose
- 3.11.1.3 Liquid Waste Treatment System
- 3.11.2.2 Dose - Noble Gases
- 3.11.2.3 Dose - Radioactive
- 3.11.2.4 Gaseous Radwaste Treatment System
- 3.11.2.5 Ventilation Exhaust Treatment System
- 3.11.3 Solid Radioactive Waste
- 3.11.4 Total Dose
- 3.12.1 Radiological Environmental Monitoring Program
- 3.12.2 Land Use Census