



**Commonwealth Edison**  
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April 13, 1982

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



Subject: LaSalle County Station Unit 1  
Snubbers  
NRC Docket No. 50-373

- Reference (a): C. Schroeder letter to A. Schwencer dated March 29, 1982, "Tech Spec 3.7.9 Snubbers, Revised list for Table 3.7.9-2"
- (b): C. E. Sargent letter to A. Schwencer dated December 8, 1981, "Proposed Technical Specification for Snubbers"
- (c): C. Schroeder letter to J. G. Keppler dated March 10, 1982, "Mechanical Snubbers in Close Proximity to Rigid Restraints, 10 CFR 50.55(e) Final Report #82-03"

Dear Mr. Schwencer:

The purpose of this letter is to provide you with additional information on snubbers at LaSalle County Station.

All safety-related snubbers have been inspected by the mechanical piping contractor (Morrison) at LaSalle County Station. Certain snubbers, which were determined to have suffered construction damage, have been replaced. Commonwealth Edison considers all safety-related snubbers to be operable as a result of this walkdown.

In September 1981, Commonwealth Edison informally provided the NRC staff with a proposed Technical Specification on snubbers. During discussions on this matter, Commonwealth Edison expressed that, from an engineering point of view, snubbers which are on smaller lines exempted from inspection in accordance with ASME Code requirements should not be included in future inspections. The Commonwealth Edison proposed snubber Technical Specification was formally transmitted to the NRC by Reference (b). Reference (a) transmitted a revised list of snubbers for inclusion in Table 3.7.9-2. The list contained Safety Related snubbers on lines 3" and larger.

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In discussions with Dr. A. Bournia on April 13, 1982, Commonwealth Edison was informed that:

- (1) The Tech Spec previously submitted by the applicant on snubbers in September, 1981, and in Reference (b) was finally reviewed by the NRC in-house and has been rejected.
- (2) The Tech Spec which was previously included in NRC draft Tech Specs will be imposed.
- (3) Additional discussions on (1) and (2) will be scheduled between the NRC and the applicant in the near future.
- (4) Per the NRC, the Tech Spec list of snubbers must include all safety-related snubbers in accordance with NRC Technical Specification Bases 3/4.7.9 snubbers.

Commonwealth Edison desires to continue discussions on this subject. In order to obtain a license for Unit 1, however, we recognize the extreme urgency for interim closure of this issue. Because all safety-related snubbers are operable at this time, there is no reason not to proceed with issuance of a license for LaSalle. The first additional inspections that are required by the NRC version of the Tech Spec take place between 4 and 10 months following Power Operation of the unit. As a result of major reviews of snubbers that are being done at LaSalle, many snubbers are being or have been removed and, in some cases, replaced with solid struts. Engineering review for removal of snubbers that are not required is expected to be completed during the next several weeks. Replacement of Unit 1 and Unit 2 snubbers required for Unit 1 operation, with solid struts has been completed in accordance with our 10 CFR 50.55(e) Final Report #82-03 (Reference (c)). Commonwealth Edison commits to provide a revised list of all safety-related snubbers required for Unit 1 operation by June 1, 1982. This schedule still provides the NRC substantial time to review the list prior to the earliest time that additional inspections may be required.

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

Very truly yours,

*CW Schroeder* 4/13/82

C. W. Schroeder  
Nuclear Licensing Administrator

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cc: NRC Resident Inspector - LSCS