



Commonwealth Edison

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January 22, 1990

Mr. A. Bert Davis
Regional Administrator
U.S. Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, IL 60137

Subject: LaSalle County Station Units 1 and 2
Response to Inspection Report Nos.
50-373/89018 and 50-374/89018
Special Maintenance Team Inspection
NRC Docket Nos. 50-373 and 50-374

Reference (a): H.J. Miller letter to Cordell Reed dated
November 20, 1989.

Dear Mr. Davis:

This letter is in response to the Safety System Functional inspection conducted by NRC personnel and consultants on July 24 through August 25, 1989, at LaSalle County Station. Reference (a) indicated that certain activities appeared to be in noncompliance with the NRC requirements. The Commonwealth Edison Company responses to the four Level IV Notice of Violations and additional open and unresolved items are provided in the following Attachments of this letter.

Commonwealth Edison appreciates the extensive effort by the Region Staff and the many useful observations and recommendations which resulted from this inspection.

An extension for the submittal of this response by January 22, 1990 was requested and granted by Mr. Monty Phillips of your staff.

If you have any questions regarding this matter, please contact this office.

Very truly yours,

T.J. Kovach
Nuclear Licensing Manager

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Q PDC

Attachments

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HPCS SYSTEM 125-Vdc DEVICES

Item No.	Device Description	Operating Range	Reference
1	Agastat 7000 Series Relay (125 Vdc)	100-150 Vdc	A
2	Agastat 7000 Series Relay (120 Vdc)	96-144 Vdc	B
3	Agastat TR Series Relay (125 Vdc)	106-138 Vdc*	C
4	Potter & Brumfield MDR Relays	82-140 Vdc	D
5	General Electric Relays		
	a) HEA61	70-140 Vdc	E
	b) HFA51	75-140 Vdc	E
	c) HMA	100-140 Vdc	E
	d) HMA100	75-140 Vdc	E
6	General Electric Circuit Breaker Type AM-4.16-350, 1200A		
	- Motor	90-130 Vdc	F
	- Trip Coil	70-140 Vdc	F
7	ITE Undervoltage Relays	100-140 Vdc	G
8	General Electric SAM #62 Timing Relay	80-150 Vdc	H
9	General Electric PJV Relay	50-160 Vdc	I
10	Woodward Governor		
	- Motor	104-127 Vdc*	J
	- Shutdown Solenoid	112-138 Vdc	J
		See Note 5	
11	Dacton Model 771 Elapsed Time Meter	40-130 Vdc	K
12	Rochester AN-1000 Annunciator	105-140 Vdc	L
13	General Electric CR106 Starter	100-140 Vdc	M
14	Stewart & Stevenson Speed Switch Model 81381 D-STC-4240 (1E22-J901)	110-150 Vdc	N
15	Agastat GP Series Relay	100-143 Vdc	O
16	General Electric Indicating Lights	110-140 Vdc	P

<u>Item No.</u>	<u>Device Description</u>	<u>Operating Range</u>	<u>Reference</u>
17	Position Indicator - Slide Wire	See Note 1	Q
18	HPCS Initiation Circuit with Resistor Loop and Signal Isolator	See Note 1	--
19	Voltmeter	N/A	--
20	Undervoltage Relay	See Note 2	--
21	Ground Detector Relay	See Note 2	--
22	Agastat E7000 Series Relay (125 Vdc)	100-138 Vdc*	R
23	Agastat 2400 Series Relay (120 Vdc)	96-144 Vdc	S
24	Basler SR8 Voltage Regulator (A5) with 125 Vdc Auto Field Flashing	See Note 3	T
25	Basler Voltage Adjust Assembly (A10)	108-132 Vdc* (135% for 5 min.)	U
26	Century L58C (Bi-Fuel Prime Pump)	See Note 4	--
27	Westinghouse 388P390 (B4 - Turbo Charger)	See Note 4	--
28	Techno ST319 Motor (B10 - Petter DSL)	See Note 4	--
29	Salem 812-6 Solenoid (125 Vdc)	85-145 Vdc	V

NOTES:

1. Resistive device not required to perform a physical function.
 2. Non-safety-related, not required to function.
 3. Current sensing device.
 4. Motors assumed to run slower on lower voltages.
 5. This is published information. Actual tests show solenoid pick-up voltage to be approximately 65 Vdc.
- * Denotes computed values based on percentages then rounded off.

REFERENCES:

- A. Agastat Catalog EMD-1, page 5, dated January 1988.
- B. Agastat Bulletin SR-30, dated January 1974.
- C. Reference A, page 17 and telcon with Glen Kitchell of Amerace verifying operating range as +10%, -15% (106.25-137.5 Vdc).
- D. Potter & Brumfield Customer Data Sheets.
- E. Telcon with Ulessy Vercelles of General Electric.
- F. General Electric Catalog Magne-Blast Metalclad Switchgear Application Guide.
- G. ITE Bulletin IB 18.4.7-2, page 5, Issue E.
- H. General Electric Bulletin GEK-7393A (64-120%).
- I. General Electric Bulletin GEK-63045, Vol. V, 9/77, Tab 17.
- J. Telcon with Woodward Governor Company and telexed parts list.
- K. Dacton Instrument Company Technical Data Bulletin 700E and telcon.
- L. Rochester Instrument Systems AN-100, Integral Solid State Annunciator Series 16/RIS AN-159.
- M. Telcon with U. Vercelles of General Electric.
- N. Sargent & Lundy Drawing 1E-1-4223AU reproduced from Stewart & Stevenson Drawing STC-4242.
- O. Reference A, page 17.
- P. General Electric Bulletin GEH-3500A.
- Q. Field walkdown unable to verify manufacturer/model.
- R. Reference A, page 10.
- S. Telcon with Glenn Kitchell of Amerace dated August 28, 1989, and Agastat Bulletin SR-15X, dated May 1971.

REFERENCES: (Continued)

- T. Basler Instruction Manual, Pub. No. 17700-99Y,
August 1971, page 19.
- U. Basler Pub. No. 90 72300 99X, dated May 13, 1974.
- V. Telcon with Stewart Bruce of Graham-White, dated
August 29, 1989.

ATTACHMENT

VIOLATION: 1R 373/89018-07
IR 374/89018-07

10 CFR 50.59(b)(1) requires that the licensee shall maintain records of changes in the facility made to the extent that these changes constitute changes in the facility as described in the safety analysis report. These records must include a written safety evaluation which provides the bases for the determination that the change does not involve an unreviewed safety question. 10 CFR 50.59(a)(2) states, in part, that a proposed change shall be deemed to involve an unreviewed safety question if the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the safety analysis report may be increased.

Contrary to the above, the written safety evaluation performed for modification M-1-1-84-019 failed to describe why the modification did not increase the consequences of failure of equipment important to safety, and failed to describe why the modification did not increase the probability of failure of equipment important to safety (i.e., the failure of the high pressure core spray (HPCS) system to perform its safety function due to the failure of relay N-86/1432 [bus is normal, with no overcurrent condition]).

CORRECTION ACTION TAKEN AND THE RESULTS ACHIEVED

Modification M-1-1-84-019 and the safety evaluation for this modification were reviewed to determine why the modification did not increase the consequences of failure of equipment important to safety and why the modification did not increase the probability of failure of equipment to safety. This review concluded that an unreviewed safety question did not exist.

The basis for concluding that the modification did not generate an unreviewed safety question is described in the following discussion.

Relay 86-N/1432 is an existing relay within the HPCS system. The modification connected spare contacts from this relay in the HPCS Diesel Generator control circuit and does not interconnect the relay to other auxiliary power system control circuits (i.e., the redundant divisions of auxiliary power). Therefore, the consequences of failure of this relay are contained within the HPCS system.

The failure of this relay results in the loss of power to HPCS and, therefore, the failure of HPCS which, as a single failure, is evaluated in the FSAR (UFSAR). Section 6.3 of the FSAR and UFSAR discusses the Emergency Core Cooling System (ECCS) and the potential single failures for ECCS including the failure of the HPCS system. Accordingly, the consequences of HPCS system failure are not increased.

Restoration of AC power to the Division III 4160-V ESF Bus is achieved by starting the diesel, verifying its running condition and connecting the generator to the 4160-V bus via an electrically operated circuit breaker. Although successful operation of the circuit breaker closing and the 4160-V bus protective relaying circuits (including Relay 86-N/1432) is required, failure to restore AC power to the bus is dominated by diesel-generator fail-to-start and fail-to-run events.

Protective relays have proven to be reliable components, an additional protective relay does not tangibly add to the probability of failure to restore AC power to the 4160-V Division III ESF Bus, and therefore, the modification does not increase the probability of failure of HPCS system.

Diesel-generator start and run scenarios require a successful initiation of a series of logical events. Numerous mechanical and electrical analog and digital inputs (e.g., cooling water, oil pressure, air pressure, DC power etc.) comprise the data base for the design of the control logic system. This control system consists of a number of electro-mechanical and electrical relays which are integrated into starting the diesel-generator and keeping the machine on-line when required for operation.

The probability of a start failure or a run failure is far greater than the probability of a failure in the protective relaying circuits for the 4160-V Division III ESF Bus. The relay is a passive device which is less likely to fail than an active device.

The modification did not result in a change to the basis for any Technical Specification; therefore, the modification did not reduce the margin of safety.

In addition, the availability of the diesel-generator as an AC supply was actually increased. Since the modification prevents closure of the D-G onto a faulted bus, it prevents damage that would have occurred to the generator. Since the time required to correct a bus fault is far less than the time required to replace a damaged generator, availability of the D-G as an AC source has increased.

Although the original 10 CFR 50.59, Safety Evaluation did not document a similar discussion to conclude that an unreviewed safety question was not created it addressed:

1. Probability of an occurrence or the consequences of an accident, or malfunction of equipment important to safety previously evaluated in the FSAR or UFSAR.
2. Possibility for an accident or malfunction different than any previously evaluated in the FSAR/UFSAR.

3. Possibility of a reduction in the margin of safety, as defined in the basis for any Technical Specification.

CORRECTIVE ACTION TAKEN TO AVOID FURTHER NONCOMPLIANCE

Subsequent to the issuance of the subject modification, Commonwealth Edison Company (CECo) developed a detailed process for performing and documenting 10 CFR 50.59 Safety Evaluations for any nuclear safety-related plant modification. This is documented in Nuclear Engineering Department (NED) Procedure Q.6.1.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance has been achieved. Documentation of adequate bases for the conclusion that this modification did not generate an unreviewed safety question has been achieved.

VIOLATION: IR 374/89018-09

10 CFR Part 50, Appendix B, Criterion XI, requires, in part, that a test program shall be established to assure that all testing required to demonstrate that components will perform satisfactorily in service is identified and performed in accordance with written test procedures which incorporate the requirements and acceptance limits contained in applicable design documents. The Relay Setting Order set point sheet specified a time lever setting of 1.0L.

Contrary to the above, no testing was performed after installation of Type IAC 51 relay 2451-AP074B into its cabinet after calibration on November 22, 1988, to verify that the acceptance limits contained in the Relay Setting Order had been met, and as a result, on August 24, 1989, the relay was found to have a time lever setting of 3.0L.

CORRECTIVE ACTION TAKEN AND RESULTS ACHIEVED

On August 29, 1989, the station installed a new calibrated Type IAC 51 relay 2451-AP-74B. The time lever was verified to be correctly set at 1.0. The work was performed in accordance with LaSalle Electrical Surveillance LES-GM-229 ("Unit 2 Southern Division OAD Periodic Protective Relay Calibration Procedure at LaSalle County Station for Relays Not Mentioned in Tech Specs,"), under station work request L85447.

CORRECTIVE ACTION TAKEN TO AVOID FURTHER NONCOMPLIANCE

On October 16, 1989 the CEC Co Operational Analysis Department (OAD) established a practice to perform an as-installed verification of the relay tap and time lever settings following calibrations. This action is expected to provide further assurance of correctly installed relay settings. LES-GM-129 and LES-GM-229 have been revised to include this verification practice.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

The station is presently in full compliance.

VIOLATION: IR 373/89018-12
IR 374/89018-13

10 CFR Part 50, Appendix B, Criterion V, requires that activities affecting quality shall be prescribed by documented instructions, procedures, or drawings, of a type appropriate to the circumstances and shall be accomplished in accordance with these instructions, procedures, or drawings. Instructions, procedures, or drawings shall include appropriate quantitative or qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished.

Contrary to the above, surveillance procedure LOS-FC-M3, Revision 19, was inappropriate to the circumstances in that it failed to provide an adequate surveillance for monitoring the motor driven fuel oil system pressure for the HPCS Diesel Generator to ensure proper functioning of the fuel pump, suction strainer, and fuel filter.

CORRECTIVE ACTION TAKEN AND RESULTS ACHIEVED

LOS-DG-M3, "1B(2B) Diesel Generator Operability Test," has been revised to incorporate the monitoring of the HPCS Diesel Generator motor driven fuel pump discharge pressure for both Units. This provides adequate surveillance to ensure proper functioning of the HPCS diesel fuel oil system.

CORRECTIVE ACTION TAKEN TO AVOID FURTHER NONCOMPLIANCE

A review of the parameters which should be monitored to ensure the operability of the diesels has been completed. This review determined that all necessary parameters are monitored. Additional items to be monitored to improve long term diesel generator reliability will be added as appropriate.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

The station is presently in full compliance.

VIOLATION: IR 373/89018-13
IR 374/89018-14

10 CFR Part 50, Appendix B, Criterion XVI requires that measures shall be established to assure that conditions adverse to quality, such as failures, deficiencies, deviations, defective material and equipment, and nonconformances are promptly identified and corrected. In the case of significant conditions adverse to quality, the measures shall assure that the cause of the condition is determined and corrective action taken to preclude repetition. Work requests L23569, L67556, and L67557 were issued to correct leaking pilot solenoid valves in the diesel generator air start system. An evaluation of these valve leaks performed on January 11, 1989, determined that they were caused by excessive line pressure.

Contrary to the above, corrective actions had not been initiated to preclude repetition for the 2B diesel generator in that line pressures were observed to be 225 psig on the west pilot solenoid valve and 210 psig on the east pilot solenoid valve while the valves maximum rated pressure was 200 psig. The licensee's program to monitor line pressures weekly had not been implemented for the 2B diesel.

CORRECTIVE ACTIONS TAKEN AND RESULTS ACHIEVED

Actual line pressures were verified, by the use of temporary, calibrated gauges, to be less than or equal to 200 psig for all five emergency diesel generator starting air pressures downstream of the pressure regulators. This action provides assurance that the regulators are correctly set and that starting air pressures are as required.

CORRECTIVE ACTION TAKEN TO AVOID FURTHER NONCOMPLIANCE

The station has initiated a program to periodically monitor the starting air pressure downstream of the regulators, for all five diesel generators. The period of monitoring will be established based on the history of the pressure regulators setpoint stability.

DATE OF FULL COMPLIANCE

The station is presently in full compliance.

UNRESOLVED ITEM: 373/89018-03
374/89018-03

Determination if Division III 125V batteries conform with 10 CFR Part 50, Appendix B requirements and standards for Class 1E components.

DIVISION III:

10 CFR 50, Appendix B was issued as a formal document on June 27, 1970. The 125V DC Division III batteries for Units 1 and 2 were purchased (CECo Purchase Order (P.O.) No. 12460) on May 24, 1970. The requirements of this document were not imposed on the battery supplier (C&D Batteries) during initial procurement. In addition, there was no formal specification prepared for this equipment by the NSSS supplier (General Electric Company) or the subcontractors Stewart & Stevenson (S&S) and C&D Batteries.

The Unit 1 Division III battery was later replaced in its entirety per CECO P.O. No. 755122 dated March 10, 1986. The replacement battery was purchased by providing a reference to the battery vendor's work order number for the initial purchase. No formal specification existed for the original battery, and the replacement battery P.O. did not specifically call for 10 CFR 50, Appendix B requirements.

In the absence of a formal specification (including quality requirements which were in effect at the time the replacement battery was ordered for Unit 1), the original and the replacement batteries were judged to meet the intent of requirements for Class 1E equipment on the following basis:

- Seismic qualification requirements per IEEE 344 were met as a result of a seismic analysis of the HPCS battery rack performed by Sargent & Lundy (S&L) (File CQD-044996).
- Battery sizing calculation prepared by S&L verify that the battery is adequately sized for its intended application. These calculations take into consideration the following design requirements which are addressed in IEEE 485, "IEEE Recommended Practice for Sizing Large Lead Storage Batteries for Generating Station and Substations":

Battery Type
Manufacturer
Minimum Electrolyte Temperature
Nominal Voltage
Minimum Voltage
Number of Cells
Number of Positive Plates/Cell
Design Margin
Aging Factor
End of Discharge Voltage/Cell

- Prior to declaring the Division III batteries operable, the station performed the following preoperational tests per PT-DG-101B and PT-DG-201B for the batteries and battery chargers:

High Voltage Shutdown
Ground Detector
Low Voltage Alarm
Battery Capacity Acceptance
Battery Service

The battery capacity and battery service tests which were performed, are similar to those specified in IEEE 450, "IEEE Recommended Practice for Maintenance, Testing, and Replacement of Large Lead Storage Batteries for Generating Stations and Substations."

Additionally, all required Technical Specification surveillances were completed prior to declaring the Division III batteries operable.

- After the replacement battery for Unit 1 was installed, all Technical Specification surveillances that were required, were performed prior to declaring the battery operational.

On this basis, the batteries have been demonstrated to meet the intent of requirements for Class 1E components at the time of their purchase.

Subsequent to the replacement of the Unit 1 Division III battery, CECO has established a generic practice such that this type of equipment replacement would now be considered a plant modification subject to the proper proceduralized controls which include among other requirements, conformance to 10 CFR 50.59 Safety Evaluation and the appropriate Modification Checklists, etc.

UNRESOLVED ITEM: 373/89018-04
373/89018-04

Assessment of DC components operability at minimum voltage conditions.

Attached is an itemized table of electrical components comprising the HPCS 125V-DC control system which was submitted to the Nuclear Regulatory Commission (NRC) during the audit. The table includes each component's operating voltage range and a reference to where it is attained.

Five of the 29 items were not justified for operation at a minimum voltage of 105V DC during the audit and are addressed as follows:

The Rochester Model AN-1000 Annunciator (Item 12) is a non-safety related component and does not affect the starting of the diesel generator. Therefore, its minimum operating voltage is not a safety concern during the time when the batteries experience their lowest output voltage.

The Agastat TR Series Relay (Item 3), the Stewart & Stevenson (S&S) Speed Switch (Item 14), the General Electric Company (GE) Indicating Lights (Item 16) and the Basler Voltage Adjuster Assembly (Item 25) are justified for operation at their lowest expected DC voltage based upon the following discussion which also addresses the capability of all of the DC components to operate properly based upon the lowest expected DC voltage that would be present at the end device.

The 125V DC electrical components in the HPCS 125V DC control system consist of devices that are required to start the Division III Diesel Generator in the event of a loss of AC power to the Division III HPCS 4160V Bus. The Division III Diesel Generator is supplied by S&S, which is the same supplier for the Division I and Division II Diesel Generators.

The 125V DC components in the HPCS 125V DC control system for starting the Division III Diesel Generator (e.g., speed switch, voltage adjuster assembly, control relays, etc.) are identical and are used in identical applications for the Division I and Division II Diesel Generator controls.

Surveillance testing performed on the Division I and Division II Diesel Generators has demonstrated successful operation of the diesel generator controls during a simulated Loss-of-Offsite Power (LOOP) with an ECCS actuation during reduced voltage tests conducted at 105V DC.

These reduced voltage tests were performed with the batteries disconnected from their circuits. The 125V DC systems were energized from their respective battery chargers adjusted to a supply voltage of 105V DC. Although an identical test was not performed on the Division III 125V DC system, successful operation of the DC components in the Division III Diesel Generator controls is expected since the components in question are identical.

Due to the resistance in the circuit cabling between the device and the supply voltage, the surveillance tests performed on the Division I and Division II 125V DC systems verified that the DC components could successfully operate at a component terminal voltage less than 105V DC. Since the cable types (e.g., conductor material, size of conductor, type insulation system, etc.) are identical for all the Divisions, circuit interconnections, and considering that the actual cable lengths between identical diesel generator control equipment for Division I and Division II are longer than those for Division III, the terminal voltage at the components for Division III are greater than the terminal voltage for those components connected to Divisions I and II.

In addition, the calculated lowest Division III battery terminal voltage for the first minute is 111.9 volts for Unit 1 and 108.3 for Unit 2 which exceeds the 105 volts used in the surveillance tests for Divisions I and II batteries.

Therefore, the 125V DC equipment for Division III will remain operable at minimum expected voltage conditions.

UNRESOLVED ITEM: 373/89018-05
374/89018-05

Determination of how the associated Class 1E wiring for diesel-generator supplied by the vendor complies with IEEE 383-1974.

Internal wires and cables provided with the HPCS Diesel-Generators (D/Gs) were furnished in accordance with General Electric (GE) Specification 21A1872, Article 4.3.13, "Electric Wiring and Components". This specification required that the wiring be furnished and sized in accordance with National Electric Code (NFPA 70). The GE specification did not require qualification to IEEE 383-1974. Since the vendor supplied conductors are not considered field routed cables, they are not subject to the requirements of FSAR Section 8.3.1.4.2.2 and UFSAR Section 8.3.1.4.2.2. The vendor supplied wires are not routed through fire seals which border fire zones. They are contained within a single fire zone. Field routed cables require IEEE 383-1974 qualification per the UFSAR to prevent the propagation of potential fires between different fire zones.

Environmental qualification for internal wiring used on the LaSalle HPCS D/Gs (including the vendor supplied wiring shown on Drawing 1E-1-4223AQ) was performed and is documented in Sargent & Lundy's (S&L) File CQD-020622. For an assumed D/G operation of 11,000 hours, the vendor wiring is assumed to be subject to a temperature of 90°C. For the remaining life of the diesel generator not in operation, the vendor wire insulation is assumed to be subject to an average temperature of 36.1°C. These temperature are included in the analysis.

The analysis was performed as an independent effort by CECo to qualify wiring locating in a mild environment to requirements of a harsh environment. 10 CFR 50.49 requires environmental qualification of Class 1E equipment and cables located in a harsh environment only. It does not require equipment and cable qualification in a mild environment. CECo's additional efforts to qualify these wires was performed in anticipation of a change in 10 CFR 50.49 which did not occur.

Since the identifiable wires were found to be qualified, and considering that the unmarked wires were less than one percent of the conductors supplied with the equipment, it is LaSalle Station's opinion that the unmarked wires were fabricated to the GE specifications the same as the marked wires.

IEEE 383-1974, Paragraph 1.1.2 specifically states that this standard is intended primarily to pertain to field cable for installation and may be used for the qualification of internal wiring of manufactured devices.

LaSalle Station's position is that all wiring is qualified in accordance with GE's original procurement specification. Advanced qualification to IEEE 383-1974 for the vendor supplied wiring is not required.

UNRESOLVED ITEM: 373/89018-08
373/89018-08

Unreviewed safety question involving M-1-1-84-019 to lockout the diesel generator from providing power to its 4.16 KV bus.

This unresolved item was addressed in violation 373/89018-07;
373/89018-07.

OPEN ITEM: 373/89018-01
384/89018-01

Revision of the UFSAR to indicate the reduced margin of HPCS fuel oil storage due to increased consumption.

LaSalle Station will revise UFSAR Section 9.5.4.1.1.d.3 to indicate the current HPCS diesel fuel oil capacity margin. Any future HPCS Diesel Generator load changes will be covered by the LaSalle modification design process which requires UFSAR review.

OPEN ITEM: 373/89018-02
374/89018-02

Revise Tech Spec to include the appropriate values for "full load" and "single largest load" for load rejection.

A Technical Specification Amendment request is expected to be submitted to the NRC by April 30, 1990, to address the problem with Technical Specifications.

OPEN ITEM: 373/89018-06
374/89018-06

Revision of Tech Spec to change the D/G Division III surveillance requirements to make them consistent with the Division I and II requirements.

A Technical Specification Amendment request is expected to be submitted to NRR by April 30, 1990, to address the problem with Technical Specifications.

OPEN ITEM: IR 373/89018-09
IR 374/89018-10

Revision of Tech Spec 4.8.2.3.2.b.3, to reflect the correct design assumptions, regarding battery electrolyte temperatures.

Calculations have been performed based on the tested capacity of the 125 volt Division I, II and III batteries for both units which justify operability at 60°F electrolyte temperature. Therefore, no Technical Specifications changes are necessary for these batteries.

For the 250 volt batteries, the Technical Specification does not specify the electrolyte temperature. The 65°F electrolyte temperature limit will remain in effect, based on calculations performed similar to the 125 volt batteries. These calculations will be updated based on future capacity testing until these batteries are replaced. To allow the 250 volt battery to remain operable at a lower electrolyte temperature, procedural guidance will be provided which will make available the option to consider load shedding of the 250 volt batteries as deemed appropriate.

OPEN ITEM: IR 373/89018-10
IR 374/89018-11

Revision of Tech Spec to accurately reflect the DIV II battery load profile.

The Technical Specification Amendment request was submitted to NRR for approval on November 29, 1988.

OPEN ITEM: IR 373/89018-11
IR 374/89018-12

NRC re-evaluation of program to not Type C test HPCS testable check valves.

LaSalle documented that 10CFR50 Appendix J Type C leakage rate tests were not required and would not be performed on the injection check valves for the HPCS, LPCS, RHR, LPCI, and RCIC systems in FSAR Table 6.2-21. This was evaluated and accepted by the NRC in the Safety Evaluation Report (NUREG-0519), Section 6.2.6.2, which states: "The applicant has indicated, and we agree, that for the following inboard valves, no Type C test will be performed;

however, periodic leak testing will be performed to ensure leak tight integrity in accordance with Section XI of the American Society of Mechanical Engineers Code. These lines include the following inboard valves:

- (1) Residual heat removal return
- (2) Low pressure coolant spray,
- (3) High pressure coolant spray,
- (4) Residual heat removal/low pressure coolant injection,
- (5) Residual heat removal head spray."

Since the current practice at LaSalle is as approved by the NRC, this item should be closed.

OPEN ITEM: IR 373/89018-14
IR 374/89018-15

Actions to correct the conditions which could result in small diameter piping and tubing failure; as described in I.E. Notice 89-07.

Currently each diesel generator is inspected for leaks during each run, at least once per 4 hours during runs of greater than 4 hours, and once per day when in standby.

On May 17, 1989, LaSalle Technical Staff recommended that the small diameter tubing on the lube oil, fuel oil and engine cooling piping be rerouted to provide adequate separation and support to prevent vibration induced failures.

The station is evaluating which diesel instrumentation tubing is required to be supported, and following engineering evaluation will determine corrective measures/modifications to be done to each diesel generator. These corrective actions will be determined by April 10, 1990.