



Commonwealth Edison
1400 Opus Place
Downers Grove, Illinois 60515

August 17, 1993

Dr. Thomas E. Murley, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Attn: Document Control Desk

Subject: LaSalle County Station Units 1 and 2
Application for Amendment to Facility
Operating Licenses NPF-11 and NPF-18
Appendix A, Technical Specifications
Implement Revisions to 10CFR20 and 10CFR50.36a
NRC Docket Nos. 50-373 and 50-374

- References:
1. Generic Letter 89-01, dated January 31, 1989, "Implementation of Programmatic Controls for Radiological Effluent Technical Specifications in the Administrative Controls Section of the Technical Specifications and the Relocation of Procedural Details of RETS to the Off-Site Dose Calculation Manual or to the Process Control Program"
 2. 10CFR20, Revision
 3. 10CFR50.36a, Revision

Dear Dr. Murley:

In accordance with 10CFR50.90, Commonwealth Edison (CECo) proposes to amend Appendix A, Technical Specifications, of Facility Operating Licenses NPF-11 and NPF-18. The proposed amendment requests changes to Technical Specification Sections 1, 5, 6 and the bases for Section 3/4.11.

The proposed amendment request provides the changes that reflect the revised requirements of 10CFR20 which become effective January 1, 1994. Additionally, the amendment request includes changes necessary to implement 10CFR50.36a revisions. These changes include: 1. adding definitions for: controlled area, dose equivalent, high radiation area, occupational dose, restricted area, deep dose equivalent, and total effective dose; revising the definition for member of the public; 2. relocating certain information from Section 5 to the Off-site Dose Calculation Manual(ODCM); 3. adding high radiation area controls; 4. extending the Radioactive Effluent Release Report submittal interval from semi-annually to annually and 5. editorial changes.

k:nla:LS:misc.:1

230017

9308230153 930817
PDR ADOCK 05000373
P PDR

ADDG 1/

August 17, 1993

The amendment request is subdivided as follows:

1. Attachment A provides a description of the proposed changes to the Technical Specifications.
2. Attachment B includes the marked-up Technical Specification page with the requested changes indicated.
3. Attachment C describes CEC's evaluation performed in accordance with 10CFR50.92(c), which confirms that no significant hazards consideration is involved.
4. Attachment D provides the Environmental Assessment.

This proposed amendment has been reviewed and approved by both CEC's On-Site and Off-Site Review in accordance with Commonwealth Edison procedures.

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

To the best of my knowledge and belief, the statements contained above are true and correct. In some respects, these statements are not based on my personal knowledge, but upon information furnished by other Commonwealth Edison and contract employees. Such information has been reviewed in accordance with company practice, and I believe it to be reliable.

Please direct any questions you have concerning this amendment request to this office.

State of Ill, County of DeKalb
Signed before me on this 17th day
of August, 1993 by Dr. Murley
Notary Public [Signature]

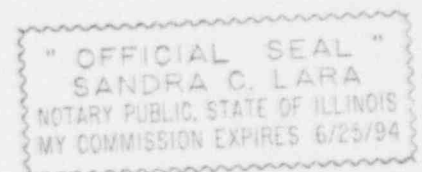
Respectfully,

[Signature]
Denise Saccomando
Nuclear Licensing Administrator

Attachments:

- A. Description and Safety Analysis of the Proposed Changes
- B. Marked-up Technical Specification Pages
- C. Evaluation of Significant Hazards Consideration
- D. Environmental Assessment

cc: J. Martin, Regional Administrator - RIII
J. Kennedy, Project Manager - NRR
D. Hills, Senior Resident Inspector - LSCS
Office of Nuclear Safety - IDNS



ATTACHMENT A

DESCRIPTION AND SAFETY ANALYSIS OF PROPOSED CHANGES

Description of the Proposed Changes

The proposed Technical Specification revisions include changes necessary to implement the revised 10CFR20 standards, changes to implement the revised 10CFR50.36a, and editorial changes. The changes include: (1) adding definitions for: controlled area, deep dose equivalent, dose equivalent, high radiation area, and restricted area; revising definitions for member of the public and unrestricted area; (2) relocating certain information in Section 5; (3) adding high radiation area controls; (4) extending the Radioactive Effluent Release Report submittal frequency from semiannual to annual; (5) editorial changes. The marked up Technical Specification pages indicating the proposed changes are provided in Attachment B. A discussion of each change follows.

1. **Proposed Changes and Additions to Definitions**

Description and Bases of the Current Requirement

Technical Specifications defines member(s) of the public and unrestricted area. These definitions are based on the current 10CFR20 definitions. Controlled area, dose equivalent, high radiation area, restricted area, and deep dose equivalent are not defined.

Description and Bases of the Requested Revision

Commonwealth Edison (CECo) proposes to revise the definitions for member of the public and unrestricted area, and add definitions for controlled area, deep dose equivalent, dose equivalent, high radiation area, occupational dose, total effectiveness and restricted area. These definitions affect Section 1. The definitions are revised or added to be consistent with the definitions in the revised 10CFR20.1003. Adding definitions to the Technical Specifications provides assurance that the requirements are understood and met. These changes are administrative in nature and facilitate implementation of the revised 10CFR20 requirements. The requirements of the LaSalle Technical Specifications will not be reduced by this change.

The revised definition for member of the public is more conservative because the definition no longer specifies the area to be occupied. Therefore, a member of the public may be closer than the site boundary. Because of this, references to member of the public need not specify his location. For the reason the location is deleted from 6.2.F.4.d, 6.2.F.4.g, 6.2.F.4.h, 6.2.F.4.i and 6.2.F.5.b, Specification 6.6.A.2 is revised to incorporate the new definition for deep dose equivalent.

ATTACHMENT A

DESCRIPTION AND SAFETY ANALYSIS OF PROPOSED CHANGES (continued)

The definition of high radiation area is revised in 10CFR20. Section 6.1.1, which describes administrative controls for high radiation areas, is changed to apply when dose rates are above 1000 mrem/h at 30 cm (12 in.), rather than the previous 1000 mrem/h at 45 cm (18 in.).

Impact of the Proposed Change

The proposed changes support the station's effort to implement the revised 10CFR20 standards, which incorporate updated scientific information, and to reflect changes in the basic philosophy of radiation protection. The revision conforms to recommendations of national and international radiation protection organizations.

The proposed definitions are unique names for the previously undefined terms. Use of these names reduces confusion and ensures that the quantities being recorded are clear. The requirements of the Technical Specifications are not be reduced by this change because the changes are administrative in nature.

2. Relocation of Certain Section 5 Information

Description and Bases of the Current Requirement

Figure 5.1-1 shows the exclusion area and site boundary for gaseous and liquid effluents. Technical Specifications Sections 5.1.3 and 5.1.4 describes the map (Figure 5.1-1). The definition of unrestricted area used in implementing these Technical Specifications has been expanded over that in 10CFR20.3(a)(17).

Figure 1.2-1 shows the Low Population Zone and is associated with 10CFR100 pre-licensing siting criteria.

Description and Bases of the Requested Revision

Figure 5.1.1-1 is being deleted because more complete information is maintained in the ODCM. The ODCM, which is controlled by Technical Specification Section 6.8, includes the methodology and parameters used in the calculation of offsite doses resulting from radioactive gaseous and liquid effluents. The ODCM contains the Radioactive Effluent Controls and Radiological Environmental Monitoring Programs required by Sections 6.2.F.4 and 6.2.F.5.

ATTACHMENT A

DESCRIPTION AND SAFETY ANALYSIS OF PROPOSED CHANGES (continued)

It also provides more detailed information than Section 5 of the Technical Specifications. Revisions to the ODCM must be submitted to the NRC in accordance with Technical Specification 6.8. This change is also consistent with Generic Letter 89-01, which allows relocation of this type of information. The requirements of the LaSalle Technical Specifications will not be reduced by this change because the deleted information is maintained and controlled in the ODCM.

Figure 5.1.2-1 is being deleted because this information is associated with 10CFR100 pre-licensing siting criteria. It is no longer appropriate for this figure to remain in the Technical Specifications.

Impact of the Proposed Change

Removing the information from Section 5 has no impact because it is maintained in the ODCM. There are no changes to any requirements. The ODCM provides more detailed information than Section 5 of the Technical Specifications. Revisions to the ODCM must be reviewed by the NRC according to Technical Specification Sections 6.2.F.4. This change is also consistent with Generic Letter 89-01, which allows relocation of this type of information.

3. Proposed Changes to High Radiation Area Controls

Description and Bases of the Current Requirement

Administrative controls for high radiation areas are described in Specification 6.11. These are based on current 10CFR20 requirements and CEC program requirements.

Description and Bases of the Requested Revision

The definition of a high radiation area is revised in 10CFR20. Section 6.1.1, which describes administrative controls for high radiation areas, is revised to apply when dose rates are above 1000 mrem/h at 30 cm (12 in.), rather than the previous 1000 mrem/h at 45 cm (18 in.). Use of the term "High" High Radiation has been deleted to be consistent with the revised 10CFR20.

The text of Technical Specifications 6.1.1.1 and 6.1.1.2 is rewritten to incorporate the revised 10CFR20 and to more accurately reflect the station's Radiation Work Permit (RWP) and dosimetry programs. The controls of items 6.1.1.3 and 6.1.1.4 are being incorporated in the revised 6.1.1.2. Sections 6.1.1.3 and 6.1.1.4 are correspondingly being deleted. These revisions ensure that exposure control is maintained.

ATTACHMENT A

DESCRIPTION AND SAFETY ANALYSIS OF PROPOSED CHANGES (continued)

Impact of the Proposed Change

Changes to Sections 6.1.1.1 & 6.1.1.2 Technical Specifications are consistent with the revised 10CFR20. They improve readability and provide consistency with federal requirements and corporate programs.

4. **Proposed Change to Submittal Frequency of Radiological Effluent Release Report**

Description and Bases of the Current Requirement

The Radiological Effluent Release Report is submitted semiannually based on the requirements of 10CFR50.36a (prior to August 31, 1992).

Description and Bases of the Requested Revision

Commonwealth Edison proposes to reduce the requirements for the submission of the Radiological Effluent Release Report from semiannual to annual for LaSalle County Station. This change affects the Technical Specifications 1.26, 6.6.A.4 and 6.8.2.c. This change is consistent with the final rule for reducing the regulatory burden on nuclear licensees that was published in the Federal Register on August 31, 1992. The rule changes include the frequency change to 10CFR50.36a.

Impact of the Proposed Change

This change is administrative in nature and makes the Technical Specifications consistent with the amended requirement of 10CFR50.36a. The change does not adversely impact the ability to meet applicable regulatory requirements related to liquid and gaseous effluents. The proposed change would also eliminate an unnecessary burden of governmental regulation without reducing the protection for public health and safety.

5. **Proposed Editorial Changes**

Description and Bases of the Requested Revision

Technical Specification 6.1.1.1 refers to 10CFR20.203. In the revised 10CFR20, the information is located in 10CFR20.1601. The reference to 10CFR20.106 in Specifications 6.2.F.4.c and 6.8.2.a.2 will accordingly be change to reference 10CFR20.1301 such that the monitoring, sampling, and analysis of radioactive liquid and gaseous effluents described in the ODCM are in compliance with the revised 10CFR20 requirements.

ATTACHMENT A

DESCRIPTION AND SAFETY ANALYSIS OF PROPOSED CHANGES (continued)

The term "dose commitment" is undefined in the present 10CFR20, and deleting it avoids any confusion with "committed dose equivalent", which is defined in the revised 10CFR20.

"Table II" of "10CFR Part 20, Appendix B, Table II, Column 2" of Specifications 6.2.F.4.b and g. is being changed to "10 CFR Part 20, Appendix B, Table 2, Column 2".

In item 6.6.A.2., "Annual Report" is being changed to "Annual Operating Report". The term "man-rem" is changed to "person-rem" to reflect company terminology. The reference film badges, pocket dosimeter and TLD, is revised to reflect more generic terminology for devices which measure radiation exposure. The reference to 10CFR20.407 is deleted because it is no longer included in 10CFR20.

The requirement to report changes in the ODCM with the Monthly Operating Report within 90 days of the effective date of change as stated in Specification 6.6.A.5 is being deleted. This is consistent with Generic Letter 89-01, and will help to avoid confusion since Specification 6.8.2 governs reporting requirements of licensee initiated changes to the ODCM.

Section 6.6.A.7 has been added to reflect the requirement to provide an annual report of personnel dose equivalent results to the NRC.

In Section 6.8.2.c, a provision is added that if the Commission holds a controlled copy of the ODCM, then CECo can provide to the NRC only the revised pages as the ODCM is changed.

Impact of the Proposed Change

The changes are administrative in nature, and do not reduce the requirements of any Technical Specification. They improve readability, and provide consistency with federal regulations and company programs.

Schedule Requirements

Commonwealth Edison plans to implement the revised 10CFR20 requirements on January 1, 1994. Therefore, it is requested that the amendment be issued prior to this date with a provision that the changes involving the 10CFR20 update will take effect on January 1, 1994.

ATTACHMENT A
DESCRIPTION AND SAFETY ANALYSIS OF PROPOSED CHANGES
(continued)

Identification and Discussion of any Irreversible Consequences

There were no irreversible consequences identified. The impact of the revised 10CFR20 on the Technical Specifications is primarily limited to revising definitions and references that have changed. In order to fully implement the revised 10CFR20 requirements, the station's Offsite Dose Calculation Manual (ODCM) will be updated. An ODCM revision that implements the revised 10CFR20 requirements will reflect the new definitions when the revised requirements are implemented. The ODCM revision will take effect on the same date as the Technical Specification amendment implementation date.