Commonwealth Edison
1400 Opus Place
Downers Grove, Illinois 60515

October 18, 1993

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

Attn.: Document Control Desk

Subject: LaSalle County Nuclear Station Units 1 and 2
Application for Amendment to Facility Operating Licenses NPF-11 and NPF-18
Technical Specifications
NRC Docket Nos. 50-373 and 50-374

References: (a) NRC Bulletin 93-03 dated May 28, 1993
(b) L.O. DelGeorge letter to T.E. Murley dated September 15, 1993
(c) P.L. Piet letter to T.E. Murley dated October 8, 1993

Dr. Murley,

Pursuant to 10 CFR 50.90, Commonwealth Edison (CECo) proposes to amend Appendix A, Technical Specifications, of Facility Operating Licenses NPF-11 and NPF-18. The proposed amendment revises Table 3.6.3-1, "Primary Containment Isolation Valves" to include new primary containment isolation valves which will be installed in response to NRC Bulletin 93-03, "Resolution of Issues Related to Reactor Vessel Water Level Instrumentation in BWRs", dated May 28, 1993.

The proposed amendment request is subdivided as follows:

1. Attachment A provides a description and safety analysis of the proposed change.

2. Attachment B provides the marked-up Technical Specifications pages for the proposed change.

3. Attachment C describes CECo's evaluation performed in accordance with 10 CFR 50.92(c), which confirms that no significant hazards consideration is invloved.

4. Attachment D provides an Environmental Assessment for the proposed change.

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

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

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.

Very truly yours,

Wayne E Morgan

Wayne E. Morgan
Nuclear Licensing Administrator

Attachments:

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

cc: J.B. Martin, Regional Administrator - RIII
D. Hills, Senior Resident Inspector - LaSalle
J.L. Kennedy, Project Manager - NRR
Office of Nulear Facility Safety

Signed before me on this 18 day
of October, 1993,
by Lynn M. Wlodarski.
Notary Public

" OFFICIAL SEAL "
LYNN M. WLODARSKI
NOTARY PUBLIC, STATE OF ILLINOIS
MY COMMISSION EXPIRES 6/25/94

ATTACHMENT A
DESCRIPTION OF SAFETY ANALYSIS OF THE PROPOSED CHANGES

Description of the Proposed Change

Commonwealth Edison LaSalle County Station (LaSalle) began the fifth refuel outage (L2R05) on Unit 2 on September 4, 1993. Per commitments made in response to NRC Bulletin 93-03, (Reference b), modifications are being made to add a backfill system for the Reactor Vessel Water Level Instrumentation (RVWLIS) reference legs. During the design for the modifications, it was determined that NRC approval is required for 1) a condition which involves an exception to General Design Criteria 55 of 10 CFR 50, Appendix A, 2) exceptions to the interpreted intent of Regulatory Guide 1.11, and 3) a potentially unreviewed safety question. A Request for approval was submitted by Reference c.

The modifications will install the backfill piping inboard of the reference leg excess flow check valve for each of four reference legs, which have instrumentation with active trip functions. The connection to the active backfill system will use check valves as the containment isolation boundary for the backfill instrument lines. Table 3.6.3-1, Primary Containment Isolation Valves, Is being updated to include these primary containment isolation check valves. The corresponding backfill modifications will be installed in LaSalle Unit 1 during the next Unit 1 refuel outage (L1R06), or the first Cold Shutdown outage after December 1, 1993, which ever comes first as outlined in reference c. To accomadate this modification a change is required to both the Unit 1 and 2 Technical Specifications.

Description of the Current Operating License/Technical Specification Requirement

Technical Specification 3/4.6.3 includes Table 3.6.3-1 which lists the specific components and Primary Containment Isolation Valves. The Table additionally includes the valve (isolation) group and the maximum isolation time in seconds for automatic isolation valves. Also included are the notes and exceptions applicable to one or more of the listed primary containment isolation valves. The table includes Automatic Isolation Valves, Manual Isolation Valves, Excess Flow Check Valves, and Other Isolation Valves.

Bases for the Current Requirement

The list of primary containment isolation valves is used as reference in various specifications and the definition of Primary Containment Integrity. The table results from the Standard Technical Specifications being used at the time LaSalle Units 1 and 2 were licensed.

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Description of the Need for Amending the Technical Specification

Primary containment isolation valves are being added by the installation of modifications M01-1-93-021, 022, and 023 for Unit 1 and M01-2-93-024, 025, 026 for Unit 2. These modifications are adding backfill instrument lines to four instrument reference legs, which require primary containment isolation valves. The isolation valves are simple check valves, which require exemption from 10 CFR 50, Appendix A, General Design Criteria 55. An exemption request was submitted in accordance with 10 CFR 50.12 on October 8, 1993 (Reference c). The eight containment isolation valves require a Technical Specification change to add them to Table 3.6.3-1.

Description of the Amended Technical Specification Requirement

Technical Specification 3.6.3, Table 3.6.3-1, Primary Containment Isolation Valves, is divided into four subsections. The new primary containment isolation valves are simple check valves and therefore can not be considered an automatic isolation valve, since there is no driving force to close the valves, except for reactor vessel pressure in excess of the check valves downstream pressure. Therefore, the check valves are being added to section d of Table 3.6.3-1 as follows with Unit 2 valve numbers shown in ():

11. Reference Leg Backfill[(p)]

    1C11-F422B(2C11-F422B)
    1C11-F422D(2C11-F422D)
    1C11-F422F(2C11-F422F)
    1C11-F422G(2C11-F422G)
    1C11-F423B(2C11-F423B)
    1C11-F423D(2C11-F423D)
    1C11-F423F(2C11-F423F)
    1C11-F423G(2C11-F423G)

(p) Two check valves in series perform the outboard containment isolation function.

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Bases for the Amended Technical Specification Request

This proposed Technical Specification amendment is necessary, because of required modifications. The modifications add primary containment isolation valves, which must be added to Table 3.6.3-1 of Technical Specifications for LaSalle Units 1 and 2. This Technical Specification amendment request is contingent upon approval by the NRC of the exemption request and resolution of the unreviewed safety question submitted by Reference c.

Schedule

The instrument reference leg backfill modifications are being installed during the current LaSalle Unit 2 fifth refuel outage, L2R05. Startup from the outage is scheduled to begin December 1, 1993. Approval of this change to Technical Specifications is requested prior to startup. Unit 2 Technical Specification amendment should be made effective upon completion of the modifications, prior to startup from L2R05. Unit 1 Technical Specification amendment should be made effective upon completion of the modifications, prior to startup from L1R06, unless the modifications are installed prior to L1R06. If Unit 1 modifications are installed prior to L1R06, the Technical Specification should be in effect upon completion of the modifications.