

ATTACHMENT A

TECHNICAL SPECIFICATION CHANGE REQUEST NPF-11/83-02

References (1): LaSalle County FSAR Appendix H

(2): NFPA Code 1982 Volume 1

Background and Discussion:

As a result of preoperational testing of CO₂ discharge valve operation in the diesel generator rooms for Unit 1, it was determined that as much as 4,000 lbs. of CO₂ would be discharged from the main tank and could result in a violation of the current Technical Specification limit of 80 % (16,000 lbs.) out of a 10 ton (20,000 #) capacity tank during the preoperational test for the 2B diesel generator. A reduced required level would allow for system surveillance testing and generator hydrogen purging without violating Tech Spec limits.

Commonwealth Edison desires to reduce the required limit for minimum CO₂ to 50%, a value currently used in the Technical Specifications for Dresden and Quad Cities Stations. Only 40% of the tank would be used in the event of two simultaneous Diesel Generator fires, an event which is beyond the requirements of the fire hazards analyses of FSAR Appendix H. This amount would still leave a 10% margin prior to reaching the proposed Technical Specification limit.

It should be noted that the preoperational test values are somewhat higher than design because of the incomplete construction sealing installed in these rooms at the time of the test. However, the test met all requirements of the Nuclear Mutual Limited Insurance Inspectors present during the test. Those values would be conservative when used to determine CO₂ usage.

Conclusion

Commonwealth Edison has reviewed this change based on the LaSalle FSAR, the System Design Specification, and the NFPA Code, and determined that a 50% minimum level in the CO₂ tank will be adequate to fight the worst single fire (diesel generator) and safely shutdown the unit with loss of offsite power with more than an adequate reserve.

Commonwealth Edison Company therefore finds no unreviewed safety questions involved.

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PLANT SYSTEMS

CO₂ SYSTEMS

LIMITING CONDITION FOR OPERATION

3.7.5.3 The following low pressure CO₂ systems of Unit 1 and Unit 2 shall be OPERABLE.*

- a. Division 1 diesel generator 0 room.
- b. Division 2 diesel generator 1A room.
- c. Division 3 diesel generator 1B room.
- d. Unit 2 Division 2 diesel generator 2A room.

APPLICABILITY: Whenever equipment protected by the low pressure CO₂ systems is required to be OPERABLE.

ACTION:

- a. With one or more of the above required low pressure CO₂ systems inoperable, within one hour establish a continuous fire watch with backup fire suppression equipment for those areas in which redundant systems or components could be damaged; for other areas, establish an hourly fire watch patrol. Restore the system to OPERABLE status within 14 days or, in lieu of any other report required by Specification 6.6.B, prepare and submit a Special Report to the Commission pursuant to Specification 6.6.C within the next 30 days outlining the action taken, the cause of the inoperability and the plans and schedule for restoring the system to OPERABLE status.
- b. The provisions of Specification 3.0.3 and 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.7.5.3 Each of the above required low pressure CO₂ systems shall be demonstrated OPERABLE:

- a. At least once per 7 days by verifying CO₂ storage tank level to be greater than ~~80%~~^{50%} full and pressure to be greater than 290 psig, and
- b. At least once per 31 days by verifying that each valve, manual, power operated, or automatic, in the flow path is in the correct position.
- c. At least once per 18 months by verifying:
 1. The system valves and associated motor operated ventilation dampers actuate, manually and automatically, upon receipt of a simulated actuation signal, and
 2. Flow from each nozzle during a "Puff Test."

*The normal or emergency power source may be inoperable in OPERATIONAL CONDITION 4 or 5 or when defueled.

PLANT SYSTEMS

FIRE HOSE STATIONS

LIMITING CONDITION FOR OPERATION

3.7.5.4 The fire hose stations of Unit 1 and Unit 2 shown in Table 3.7.5.4-1 shall be OPERABLE.

APPLICABILITY: Whenever equipment in the areas protected by the fire hose stations is required to be OPERABLE.

ACTION:

- a. With one or more of the fire hose stations shown in Table 3.7.5.4-1 inoperable, route an additional fire hose of equal or greater diameter to the unprotected area(s)/zone(s) from an OPERABLE hose station within 1 hour if the inoperable fire hose is the primary means of fire suppression; otherwise, route the additional hose within 24 hours. Restore the inoperable fire hose station(s) to OPERABLE status within 14 days or, in lieu of any other report required by Specification 6.6.B, prepare and submit a Special Report to the Commission pursuant to Specification 6.6.C within the next 30 days outlining the action taken, the cause of the inoperability and the plans and schedule for restoring the system to OPERABLE status.
- b. The provisions of Specifications 3.0.3 and 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.7.5.4 Each of the above required fire hose stations shown in Table 3.7.5.4-1 shall be demonstrated OPERABLE:

- a. At least once per 31 days by a visual inspection of the fire hose stations accessible during plant operation to assure all required equipment is at the station.
- b. At least once per 18 months by:
 1. Visual inspection of the fire hose stations not accessible during plant operation to assure all required equipment is at the station.
 2. Removing the hose for inspection and re-racking, and
 3. Inspecting all gaskets and replacing any degraded gaskets in the couplings.
- c. At least once per 3 years by partially opening each hose station valve to verify valve OPERABILITY and no flow blockage.
- d. Within 5 years and between 5 and 8 years after purchase date and at least every 2 years thereafter by conducting a hose hydrostatic test at a pressure of 150 psig or at least 50 psig above the maximum fire main operating pressure, whichever is greater.

ATTACHMENT B

Status of License Change Requests

<u>Change Request</u>	<u>Description</u>	<u>Status</u>
NPF-11/82-14	Rad Effluent Tech Specs revision of reporting, etc.	Submitted to NRC 4-08-82. Telecon 12/82 awaiting CECO resubmittal per agreement in telecon.
NPF-11/83-01	Add position of Project Manager	Submitted to NRC 2-24-83.
NPF-11/83-02	Revise CO ₂ tank level requirement	Submitted to NRC 2-24-83.