



Commonwealth Edison

One First National Plaza, Chicago, Illinois

Address Reply to: Post Office Box 767

Chicago, Illinois 60690

March 18, 1983

Director of Nuclear Reactor Regulation
Attention: Mr. A. Schwencer, Chief
Licensing Branch No. 2
Division of Licensing
U. S. Nuclear Regulatory Commission
Washington, DC 20555

Subject: LaSalle County Station Unit 2
Potential License Conditions
NRC Docket No. 50-374

Reference: LaSalle County Station Unit 1, License
NPF-11, as amended through Amendment 12.

Dear Sir:

The purpose of this letter is to review the status of Unit 1 license conditions, as potentially applied to Unit 2 at LaSalle County Station. The attachment quotes each Unit 1 license condition and then provides the status of implementation or Commonwealth Edison Company's position on each condition as potentially applied to Unit 2.

In cases where an implementation date is stated this is the current best estimate of completion date. For those items that are classified as installed, documentation, corrections of deficiencies (if any) and completion of testing is expected to be completed prior to Unit 2 license issue. This letter will be updated as the fuel load date approaches.

Please note that the attachment contains the following official requests by Commonwealth Edison Company regarding the Unit 2 license:

- 2.C.(1) - Maximum Power Level - Request for full power license issue
- 2.C.(25) - Fire Protection - Request for exemptions
- 2.C.(27) - Industrial Security - Request for exemptions
- 2.C.(34) - Single Loop Recirculation - Request for permission
- 2.D. - Criticality Monitor - Request for exemption
- Startup Testing Inerting - Request for exemption
- 2.H. - License Expiration - Request for 40-year license.

To the best of my knowledge and belief the statements contained herein and in the attachment 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 contractor employees. Such information has been reviewed in accordance with Company practice and I believe it to be reliable.

Boo1
s
1/40

Director of NRR

- 2 -

March 18, 1983

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

Enclosed for your use are one (1) signed original and forty (40) copies of this letter and the attachment.

Very truly yours,

CW Schroeder 3/19/83

C. W. Schroeder
Nuclear Licensing Administrator

lm

Attachment

cc: J. G. Keppler - RIII
NRC Resident Inspector - LSCS

6085N

UNIT 1 - LICENSE CONDITIONS

2.C.(1) Maximum Power Level

The licensee is authorized to operate the facility at reactor coolant core power levels not in excess of full power (3323 megawatts thermal).

UNIT 2 - STATUS/CECo POSITION

Commonwealth Edison Company officially requests that the initial Unit 2 license be issued for full power operation.

UNIT 1 - LICENSE CONDITIONS

- 2.C.(2) The Technical Specifications contained in Appendix A, as revised through Amendment No. 12, and the Environmental Protection Plan contained in Appendix B, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

UNIT 2 - STATUS/CECo POSITION

This is a standard license condition and should be included as stated above, with the exception of the phrase "as revised through Amendment No. 12."

UNIT 1 - LICENSE CONDITIONS

2.C.(3) Conduct of Work Activities During Fuel Load and Initial Startup

The licensee shall review by committee all Unit 1 Preoperational Testing and System Demonstration activities performed concurrently with Unit 1 initial fuel loading or with the Unit 1 Startup Test Program to assure that the activity will not affect the safe performance of the Unit 1 fuel loading or the portion of the Unit 1 Startup Program being performed. The review shall address, as a minimum, system interaction, span of control, staffing, security and health physics, with respect to performance of the activity concurrently with the Unit 1 fuel loading or the portion of the Unit 1 Startup Program being performed. The committee for the review shall be composed of at least three members, knowledgeable in the above areas, and who meet the qualifications for professional-technical personnel specified by section 4.4 of ANSI N18.7-1971. At least one of these three shall be a senior member of the Assistant Superintendent of Operation's staff.

UNIT 2 - STATUS/CECo POSITION

A similar license condition is appropriate for Unit 2. All "Unit 1" above should be changed to "Unit 2".

UNIT 1 - LICENSE CONDITIONS

2.C.(4) Resolution of Rebar Damage and Adequacy of Off-Gas Building Roof

The licensee shall complete its assessment of the rebar damaged due to drilling and coring in concrete and the structural adequacy of the off-gas building roof. The results shall be reported to the NRC staff for review and approval, prior to power operation following initial criticality and zero power physics testing.

UNIT 2 - STATUS/CECo POSITION

References (a): United States of America, Nuclear Regulatory Commission, Office of Nuclear Reactor Regulation, H. R. Denton, Director, Director's Decision under 10 CFR 2.206, DD-83-1, dated February 8, 1983.

(b): United States of America, Nuclear Regulatory Commission, Office of Nuclear Reactor Regulation, H. R. Denton, Director, Director's Decision under 10 CFR 2.206, DD-82-9, dated July 19, 1982.

(c): U.S. NRC Inspection Report Nos. 50-373/82-43 and 50-374/82-11 dated January 7, 1983.

The above References (a), (b), and (c) state the NRC's basis for total closure of this issue for Unit 2. Therefore, this condition should not appear in the Unit 2 license.

UNIT 1 - LICENSE CONDITIONS

2.C.(5) Snubbers

- (a) Prior to criticality, the licensee shall submit for NRC approval, a revised list of safety-related snubbers to be contained in Table 3.7.9-1 of the Technical Specifications to include such snubbers on lines 3 inches in diameter or less.
- (b) Prior to startup after the first refueling outage, the licensee shall provide, as necessary, a revision to the Technical Specifications to remove snubbers that are determined to be unnecessary and replace them with rigid strut and rod assemblies.

UNIT 2 - STATUS/CECo POSITION

- (a) This list is currently in preparation for Unit 2 and Commonwealth Edison expects to submit this list to the NRC prior to license issue. Therefore, this condition should not appear in the Unit 2 license.
- (b) The initial snubber reduction program is expected to be completed prior to Unit 2 license issue. The overall program is not expected to be completed until prior to startup after the first refueling outage. Therefore, the same license is appropriate for Unit 2.

UNIT 1 - LICENSE CONDITIONS

2.C.(6) Deferred Preoperational Deficiencies

The licensee shall satisfactorily resolve those deficiencies which were deferred from the preoperational testing program on a schedule that shall assure that the capability of a system required to be operable by Technical Specification is not degraded.

UNIT 2 - STATUS/CECo POSITION

The same license condition is appropriate for Unit 2.

UNIT 1 LICENSE - CONDITION

2.C.(7) Surveillance of Tendons (Section 3.8.1*, SSER #3)

Prior to full power, the licensee shall supply the predicted lift-off forces required to complete Tables 4.6.1.5-1 and 4.6.1.5-2 of the Technical Specifications.

UNIT 2 - STATUS/CECo POSITION

These tables have been prepared for Unit 2 and are expected to be provided to the NRC prior to license issue. Therefore, this condition should not appear in the Unit 2 license.

UNIT 1 LICENSE - CONDITION

2.C.(8) Masonry Wall (Section 3.8.3, SER, SSER #2)

Based on the findings of our preliminary review of the licensee's submittals and its commitments related to masonry wall evaluation, the following actions are required by the licensee:

- (a) The present fixes for modifications implemented shall not preclude the option of implementing additional modifications if directed by our future review of the licensee's design criteria.
- (b) Prior to startup after the first refueling outage, the licensee shall resolve the differences between our interim criteria and the criteria used by the licensee to the satisfaction of the staff and shall implement the required wall fixes or modifications that might result from such a resolution.

UNIT 2 - STATUS/CECo POSITION

- References (a): D. L. Peoples letter to D. G. Eisenhut, dated July 8, 1980 in response to Information Request on Category I Masonry Walls Employed by Plants under CP and OL review, dated April 21, 1980.
- (b): L. O. DelGeorge letter to B. J. Youngblood dated February 4, 1981, in response to the Request for Additional Information on Category I Masonry Wall Design, dated January 19, 1981.
- (c): L. O. DelGeorge letter to A. Schwencer, dated April 24, 1981 providing response to R. L. Tedesco letter to J. S. Abel, dated March 2, 1981, requesting additional information in the design of concrete masonry walls for LaSalle County Station, Units 1 and 2.
- (d) C. W. Schroeder letter to R. D. Walker dated February 24, 1982, providing "Final Report in Response to NRC IE Bulletin 80-11, Masonry Wall Design for LaSalle County Station."
- (e) C. W. Schroeder letter to A. Schwencer dated December 9, 1982 providing "LaSalle County Station Units 1 and 2 Reevaluation of Safety-Related Concrete Masonry Walls."

References (a), (b), (c), (d), and (e) have provided Commonwealth Edison Company's input on this topic. The NRC has not provided any input to Commonwealth Edison Company for LaSalle County Station since the submittal of Reference (d) one year ago. As stated in Reference (e), which was submitted three months ago:

"Commonwealth Edison Company urges the NRC to conclude their review of this matter no later than June, 1983. Delay of resolution of this issue beyond that time may preclude completion of Commonwealth Edison review, design, procurement, and installation of any required fixes or modifications by the startup following the first refueling outage, which is currently scheduled for Fall, 1984." This same philosophy applies to Unit 2. Commonwealth Edison Company believes that the NRC should concur that the actions already taken are sufficient and no further action is required.

Commonwealth Edison Company continues to object to the concept of the imposition of license conditions for which resolution is not within the direct control of Commonwealth Edison. The startup of a unit following the first refueling outage should not be constrained because the NRC may not have completed their review on a schedule to permit licensee action. Therefore, this condition should not appear in the Unit 2 license.

UNIT 1 LICENSE - CONDITION

2.C.(9) Inservice Testing of Pumps and Valves (Section 3.9.6, SER)

Pursuant to 10 CFR 50.55a, the relief that the licensee has requested from the pump and valve testing requirements of 10 CFR Part 50, Section 55.55 (g)(2) and (g)(4)(i) is granted for that portion of the initial 120-month period during which we complete our review.

UNIT 2 - STATUS/CECo POSITION

Commonwealth Edison Company expects to submit the Unit 2 IST program prior to Unit 2 license issue. The same license condition is appropriate for Unit 2.

UNIT 1 LICENSE - CONDITION

2.C.(10) Dynamic Qualification (3.10, SER, SSER #1, SSER #2)

- (a) Prior to startup after the first refueling outage, the licensee shall complete any modifications or replacement of equipment as a result of the fatigue evaluation. In the interim, the licensee shall document the occurrence of every safety relief valve actuation into the suppression pool, the associated cumulative damage factors calculated for typical representative equipment and kept up-to-date, and report to NRC any malfunction of equipment that occurs due to any safety relief discharge.
- (b) Prior to startup after the first refueling outage, the licensee shall replace or modify the NSSS equipment (intermediate range monitor, C51-K-601A/H and two-inch air-operated globe valve, C11-F011) if the results of the requalification tests indicate either change is required.

UNIT 2 - STATUS/CECo POSITION

References (a): C. E. Sargent letter to A. Schwencer dated December 15, 1981, LaSalle County Station Units 1 and 2, SQRT Status Report and NRC Requested Information.

(b): C. E. Sargent letter to A. Schwencer, dated February 9, 1982, "LaSalle County Station Units 1 and 2, SQRT Status Report, Volume 12.

a) Reference (a) provided the following:

1. ASME - TGDA draft document dated 10-09-73, a fatigue evaluation for seismic loading.
2. A topical report by Sargent & Lundy "Fatigue Considerations in Equipment Qualification." This report was provided to the NRC-SQRT audit members during the SQRT audit of LaSalle in 1980.
3. Fatigue Analysis Reports on LPCS pump consisting of:
 - a) LPCS Dynamic Analysis Report (from which the loads are taken)
 - b) The fatigue evaluation report.

This evaluation package required no modifications or replacement of equipment. Commonwealth Edison Company has received no input from the NRC on this topic during the past 14 months. The requirements of this condition were met prior to Unit 1 license issue. Therefore, this condition should not appear in the Unit 2 license.

- b) Reference (b) provided the acceptable qualification results for the IRM (Intermediate Range Monitor) two months prior to the Unit 1 license issue date. Therefore, this part of the condition should not have appeared in the Unit 1 license and should not appear in the Unit 2 license. The two inch air operated globe valves C11-F011 and C11-F012 have been eliminated on Unit 2 and have been replaced by four other qualified valves as part of the Scram Discharge Volume modification. Those four valves have been installed. Therefore, this condition should not appear in the Unit 2 license.

UNIT 1 LICENSE - CONDITION

2.C.(11) Environmental Qualifications (Section 3.11, SER, SSER #1, SSER #2)

- (a) No later than March 31, 1985, the licensee shall be in compliance with the provisions of NUREG-0588, "Interim Staff Position on Environmental Qualification of Safety-Related Electrical Equipment", for safety-related electrical equipment exposed to a harsh environment.
- (b) Complete and auditable records must be available and maintained at a central location which describe the environmental qualification methods used for all safety-related electrical equipment in sufficient detail to document the degree of compliance with NUREG-0588. Such records shall be updated and maintained current as equipment is replaced, further tested, or otherwise further qualified to document complete compliance no later than March 31, 1985.

UNIT 2 - STATUS/CECO POSITION

The environmental qualification program for LaSalle County Station is common to both units. Commonwealth Edison Company is currently working on a schedule to meet the March 31, 1985, date. Unforeseen equipment qualification failures could result in the need for a case-by-case consideration as the due date approaches.

UNIT 1 LICENSE - CONDITION

2.C.(12) Seismic and Loss-of-Coolant Accident Loads (Section 4.2.3.4, SER, SSER #1, SSER #2)

- (a) By July 30, 1982, the licensee shall submit to NRC a complete description of the analytical methods along with all analytical results necessary to show that LaSalle fully meets the criteria of Appendix A to the Standard Review Plan, Section 4.2 (NUREG-0800) with regard to fuel assembly liftoff.
- (b) Prior to startup after the first refueling outage, the review of the fuel assembly liftoff issue must be satisfactorily resolved to the satisfaction of the staff.

UNIT 2 - STATUS/CECO POSITION

- a) License condition C.2.(12) treats the fuel assembly response to combined LOCA and seismic loads. The SER acknowledged GE's topical report NEDE-21175P on fuel lift-off but took exception to the fact that the conclusion of adequacy was based on an early conservative analysis. NRC's consultant on this generic issue had been working directly with GE on a more refined model on which the Commission was awaiting a generic response. Because the g-loading at LaSalle was significantly less than that needed to exceed allowable stresses or exceed the lift-off gap, the first conclusion in the SER was that future calculations would confirm the initial conclusion of adequacy for LaSalle, therefore the issue was resolved for LaSalle.

Subsequently in SSER #1, the staff reviewer quoted the results of a consultant's appraisal (Idaho National Engineering Laboratory Report, EGG-EA-5151, "GE Fuel Assembly Lift-Off", May 1980) as suggesting that significant lift-off was unlikely. Acknowledgment was also made of GE's June 8, 1981 LaSalle evaluation that the amount of lift-off was not sufficient to disengage the fuel from the lower tie-plate. A reiteration was made that this issue was considered resolved for LaSalle.

However, as a result of a preliminary analysis by a staff reviewer on GE's generic submittal, the staff held the generic issue open into late 1980 with the expectation that GE's refined model would be reported in a topical generic licensing report. When this report was delayed by higher priority work, the staff reviewer requested confirmation of the LaSalle lift-off conclusion based on the newer GE model. This was provided on June 8, 1981 by CECO. In SSER #2 the NRC concluded that, because the model was not described on the LaSalle docket and because the generic issue could not be resolved until GE provided the generic report with the actual computer model, this issue would become a condition of license for LaSalle. GE's topical report was scheduled for submittal in July 82, much too late for the initial license for fuel load of LaSalle Unit 1. CECO then arranged for a confirmatory engineering submittal for the Unit 1 license.

On February 24, 1982 CECo provided confirmatory engineering results for fuel lift-off for LaSalle calculated with the improved GE model. Also, technical model details were provided sufficient to describe the inputs, constraints, modeling considerations, etc., which pertained to the improved GE model. The conclusions remained the same and the methodology was adequately described to permit a critical analysis of its validity and accuracy. The Commission reviewer did not find this adequate or inadequate but iterated the obvious conclusion that LaSalle was serving as leverage to obtain the revised model in a generic report from GE; the condition of license had been met but was to be retained until the topical report was received by the NRC generic reviewer.

NEDE-21175-3P (GE Proprietary), the revised BWR fuel assembly report for BWR 4/5/6 was transmitted to NRC on July 30, 1982 for the LaSalle docket. By letter of July 27, 1982 the same report was submitted by GE to J. F. Quirk, the generic reviewer. This report provided the analytical results for the various BWR's and tabulated the wide margins of safety against lift-off. It also included the analytical methodology for which LaSalle license condition 2.C.(12) had been retained. This response met the scheduled deadline; however, to date, no acknowledgement of the fulfillment of this condition has been received by Edison.

Based upon the fact that (1) the calculated stresses and the margin for assembly lift-off at LaSalle have never been part of the issue and based upon the fact that (2) several LaSalle submittals established insignificance of fuel lift-off and (3) that the details of the model have been provided on the LaSalle docket as well as via the generic submittal, it is concluded that license condition 2.C.12(a) in NPF-11 has been completely fulfilled. It, therefore, should not appear in the Unit 2 license.

- b) No LaSalle specific contact has been made by the NRC on this topic during the seven months that have elapsed since Condition 2.C.(12).(a) was met for the LaSalle Unit 1. Commonwealth Edison Company continues to object to the concept of imposition of license conditions for which resolution is not within the direct control of Commonwealth Edison. The startup of a unit following the first refueling outage should not be constrained because the NRC may not have completed their review on a schedule to permit licensee action. Therefore, this condition should not appear in the Unit 2 license.

UNIT 1 LICENSE - CONDITION

2.C.(13) Surveillance of Control Blade (Section 4.2.3.14, SER)

I.E. Bulletin No. 79-26, Revision 1, "Boron Loss from BWR Control Blades," describes certain actions to be taken by licensees to determine boron loss from BWR control blades. The licensee shall comply with items 1, 2 and 3 of this bulletin and submit a written response on item 3 within 30 days after plant startup following the first refueling outage.

UNIT 2 - STATUS/CECo POSITION

Commonwealth Edison Company is participating in the GE BWR generic program on Control Rod Blade Surveillance and believes this is the appropriate forum for resolution of the topic with the NRC. The redundant information gathering exercise required by this condition is an inappropriate topic for a license condition. Therefore, this condition should not appear in the Unit 2 license.

UNIT 1 LICENSE - CONDITION

2.C.(14) Scram Discharge Volume (Sections 4.6.2, SER and 6.3.2.3, SSER #2

- (a) Prior to startup after the first refueling outage, the licensee shall incorporate the following additional modifications into the scram discharge volume system:
 - (i) Redundant vent and drain valves, and
 - (ii) Diverse and redundant scram instrumentation for each instrumented volume, including both delta pressure sensors and float sensors.
- (b) Prior to startup after the first refueling outage, the licensee shall complete system or procedural modifications, if required, as a result of the staff's completion of its review of the licensee's response to NUREG-0803.

UNIT 2 - STATUS/CECo POSITION

- (a) Commonwealth Edison Company currently expects that these modifications will be completed prior to Unit 2 license issue.
- (b) Commonwealth Edison Company is awaiting the completion of the review by the NRC on this topic. Commonwealth Edison Company continues to object to the concept of imposition of license conditions for which resolution is not within the direct control of Commonwealth Edison. The startup of a unit following the first refueling outage should not be constrained because the NRC may not have completed their reviewed on a schedule to permit license action. Therefore, this condition should not appear in the Unit 2 license.

UNIT 1 - LICENSE CONDITION

2.C.(15) Low Pressure in Pump Discharge of the Control Rod Drive (Section 4.6.2, SSER #2)

Prior to startup after the first refueling outage, the licensee shall install instrumentation for an automatic scram that would shut down the reactor in the event of low control rod drive pump discharge pressure to be activated during startup and refueling modes only.

UNIT 2 - STATUS/CEC₀ POSITION

The same license condition is appropriate for Unit 2.

UNIT 1 - LICENSE CONDITION

2.C.(16) Containment Long Term Program Load Specifications (6.2.1.1. SSER #2)

Prior to October 1, 1982, the licensee shall submit its confirmatory assessment of the containment design adequacy for pool dynamic loads (chugging, vent lateral and diaphragm reverse pressure) developed in conjunction with the Long Term Program and reported in NUREG-0808.

UNIT 2 - STATUS/CECo POSITION

Reference (a): C. W. Schroeder letter to A. Schwencer dated September 24, 1982, LaSalle County Station Units 1 and 2, Design Assessment Report, Revision 10.

License Condition 2.C.(16) was fulfilled by Reference (a). Therefore, this condition should not appear in the Unit 2 license.

UNIT 1 - LICENSE CONDITION

2.C.(17) DELETED

2.C.(17) Pressure Interlocks on Valves Interfacing at Low and High Pressure (Section 6.3.4, SSER #2)

Prior to startup after the first refueling outage, the licensee shall implement isolation protection in conformance to the requirements of Section 6.3 of the Standard Review Plan against overpressurization of the low pressure emergency core cooling systems (RHR/LPCI and LPCS) at the high and low pressure interface containing a check valve and a closed motor-operated valve.

UNIT 2 - STATUS/CECo POSITION

Commonwealth Edison Company currently expects that this modification will be completed on Unit 2 prior to Unit 2 license issue. Therefore, this condition should not appear in the Unit 2 license.

UNIT 1 - LICENSE CONDITION

2.C.(18) Compliance with Regulatory Guide 1.97 (Sections 7.5.2, SER)

By July 1, 1982, the licensee shall provide a plan for implementing modifications necessary to comply with Revision 2 of Regulatory Guide 1.97, "Instrumentation for Light Water Cooled Nuclear Power Plants to Assess Plant Conditions During and Following an Accident," dated December 1980.

UNIT 2 - STATUS/CECo POSITION

Reference (a): C. W. Schroeder letter to A. Schwencer dated June 29, 1982, LaSalle County Station Units 1 and 2, Compliance with Regulatory Guide 1.97.

Reference (a) fulfilled the requirements of License Condition 2.C.(18) for Units 1 and 2. Therefore, this condition should not appear in the Unit 2 license.

UNIT 1 - LICENSE CONDITION

2.C.(19) Additional Instrumentation and Control Concerns (Section 7.7.3.4, SSER #1)

The licensee shall resolve the following concerns to the NRC staff's satisfaction prior to startup after the first refueling outage:

- (a) whether common electrical power sources or sensor malfunctions may cause multiple control systems failures, and
- (b) whether high energy line breaks will result in unacceptable consequential control system failures.

UNIT 2 - STATUS/CECo POSITION

LaSalle responses to these questions were previously submitted to the NRC as follows:

1. By letter of September 30, 1981 Edison provided an "Assessment to Justify Interim Operation" of LaSalle (Rev. 0) pending completion of the requalification of safety-related equipment in potentially harsh environments. Subsequent discussion with "Component Application Statements" (see below) based on failure mode analyses of the safety equipment and its supporting equipment.
2. The "Ninety Day Report" was submitted on July 28, 1982 in response to Appendix C of SSER #2. This composite report responded to Appendix C requests for information; included an updated version of the "Assessment to Justify Interim Operations" with its Appendix F (as Volume II) that presented the component application statements for the mitigating equipment which could potentially experience a harsh environment. The methodology used in these extensive reports included considerations of a) failure effects on other safety systems; b) failure effects on other non-safety systems; c) failure effects of power supplies and other supporting equipment (pneumatic, structural structural, etc.); d) failure effects from external events, accidents, transients, etc.; and e) effects of worst single failure criterion. The failure effect of misleading the operator was discussed in the "Component Application Statements" for each safety-related device potentially exposed to harsh environments. Also, Section C of the basic report responded to NRC questions posed from the earlier Rev. 0 submittal identified in the first paragraph above.

3. FSAR Amendment 60 (March 82) included amplified responses to IE Notice 79-22 concerning potential effects of HELB-caused non-safety system failures on required safety-related systems. The LaSalle response is documented in FSAR response to Questions 031.286. Because the related Question 031.289 addressed the same type of potential failure propagation between non-safety and safety-related controls and sensors as caused by common power supply problems/failures, that enumeration was also included as Part B to the 031.288 writeup. See also the response to Q031.289.
4. FSAR Amendment 62 (December 82) provided responses to NRC questions 031.290 through 031.296 which addressed the hypothesis of multiple control system failures or common power/sensor losses due to HELB (including LOCA's). Upstream propagation of power equipment failures was considered also. Informational copy of these responses was provided by CECO letter of October 6, 1982 to Mr. A. Schwencer.
5. FSAR Appendix C addressed the location and extent of HELB events outside primary containment and possible mechanical effects resulting therefrom. Design of physical constraints, layout of piping and equipment exclusion zones resulted from this design consideration. Physical separation of redundant systems is a design feature of the cubiclized LaSalle plant.

The above references substantiate the conclusion that the results of multiple failures of non-safety related control systems-whether caused by HELB events, power/sensor failures or postulated safety system failures do not lead to results beyond those bounding events in Chapter 15 of the FSAR. All of the above referenced hypotheses are included within the context of the Nuclear Safety Operation Analysis (NSOA) of FSAR Appendix D which was used originally to identify the bounding BWR accident cases. Nothing new has been added except detailed interpretations on that fundamental safety analyses.

Inasmuch as four separate LaSalle analyses have addressed the issue of multiple failures at plant level (layout, separation), at system level, at component level, and at FEMA level (circuitry) and because no consequence has been found that exceeds that bounding accident cases of Chapter 15 of the LaSalle FSAR, it can be concluded that License Condition 2.C.(19) on NPF-11 has been fulfilled for Units 1 and 2. Therefore, this condition should not appear in the Unit 2 license.

UNIT 1 - LICENSE CONDITION

2.C.(20) Low and/or Degraded Grid Voltage (Section 8.2.2.2, SER)

The licensee shall install a second level of undervoltage protection prior to startup after the first refueling outage.

UNIT 2 - STATUS/CECo POSITION

Commonwealth Edison Company is attempting to complete this item prior to Unit 2 license issue. There are, however, potential hardware and delivery problems. If this item is not completed prior to Unit 2 license issue, the same license condition is appropriate for Unit 2.

UNIT 1 - LICENSE CONDITION

2.C.(21) Reliability of Diesel-Generators (Sections 8.3.1.1, SER and 9.6.3.4, SER)

Prior to startup after the first refueling outage, the licensee shall implement the following design modifications with respect to diesel-generator reliability:

- (a) A heavy duty turbocharger gear drive assembly be installed on the diesel-generators.
- (b) A prelube pump, powered from a reliable direct current power supply, be installed in the system to operate in parallel with the engine-driven lube oil pump, or an alternative acceptable to the NRC shall be installed to preclude dry-starting of the diesel-engine.
- (c) Controls and monitoring instrumentation be removed from the engine and engine skid, except instruments qualified for this location. The non-qualified control and monitoring instruments shall be installed on a free standing floor mounted panel and located on a vibration free floor area. If the floor is not vibration free, the panel shall be equipped with vibration mounts.

UNIT 2 - STATUS/CECo POSITION

- (a) Commonwealth Edison Company does not expect to complete this item on Unit 2 prior to license issue. The same license condition is appropriate for Unit 2.
- (b) This item has been the subject of several submittals and telecons between CECo and the NRC. Commonwealth Edison Company, in conjunction with the supplier and manufacturer, continue to believe that the modification proposed by the NRC degrades the reliability of the diesel generator because of the probability of introducing a vapor lock. Commonwealth Edison has proposed the modification recommended by the supplier and manufacturer as an acceptable alternative. The resolution of this issue on Unit 1 will provide the basis for closure on Unit 2.
- (c) Commonwealth Edison Company does not expect to complete this item on Unit 2 prior to license issue. The same license condition is appropriate for Unit 2.

UNIT 1 - LICENSE CONDITION

2.C.(22) Direct Current Power Systems (Section 9.3.1.2, SER)

Prior to startup after the first refueling outage for the 125 and 250-volt direct current systems for Divisions 1 and 2 and the 125-volt Division 3 direct current system, the following additional instrumentation shall be provided in the control room: (1) Battery current (ammeter-charge/ discharge), (2) Battery charger output voltage (voltmeter), (3) Battery charger output current (ammeter), (4) Battery high discharge rate alarm, and (5) Battery charger trouble alarm. In the interim, the licensee shall implement approved procedures to monitor battery current, battery charger output voltage, and battery charger output current at the local panels at least once per eight hour shift.

UNIT 2 - STATUS/CECo POSITION

Commonwealth Edison Company is attempting to complete this item prior to Unit 2 license issue. There are, however, potential hardware and delivery problems. If this item is not completed prior to Unit 2 license issue, the same license condition is appropriate for Unit 2.

UNIT 1 - LICENSE CONDITION

2.C.(23) Reactor Containment Electrical Penetrations (Section 8.4.1, SER)

Prior to startup after the first refueling outage, a redundant fault current device (circuit breakers or fuses) shall be provided on each penetrating circuit that would limit a fault current surge to be less than the surge for which the penetration is qualified except for low energy (milliamps) instrument systems.

UNIT 2 - STATUS/CECo POSITION

This change has been installed on Unit 2. Therefore, this condition should not appear in the Unit 2 license.

UNIT 1 - LICENSE CONDITION

2.C.(24) Separation of Class 1E and Non-Class 1E Cable Trays (Section 8.4.6.1, SER, SSER #1, SSER #2)

Prior to startup after the first refueling outage, the licensee shall provide adequate separation or barriers between Class 1E and adjacent non-Class 1E cable trays.

UNIT 2 - STATUS/CECo POSITION

A demonstration test was performed in February, 1983 and a report of the test results is expected to be submitted in March, 1983. Pending prompt NRC review and closure, it is expected that this issue will be closed prior to Unit 2 license issue. Therefore, this condition should not appear in the Unit 2 license.

UNIT 1 - LICENSE CONDITION

2.C.(25) Fire Protection Program (Section 9.5, SER. SSER #2, SSER #3)

- (a) The licensee shall maintain in effect and fully implement all provisions of the approved fire protection plan. In addition, the licensee shall maintain the fire protection program set forth in Appendix R to 10 CFR Part 50, except for the following deviations:
 - (i) Hydrostatic hose tests in accordance with NEPA 1962-1979, and
 - (ii) No automatic fire detection systems in areas 2K/3K and 5B4.
- (b) Prior to initial criticality, the licensee shall install a 1-hour rated barrier on all four sides of a partially protected power cable pan and a general sprinkler system, both located in the diesel-generator corridor.
- (c) Prior to startup after the first refueling outage, the licensee shall provide fire protection systems in fire areas 2C/3C, 4C3 and 6E.
- (d) Prior to startup after the first refueling outage, the licensee with respect to fire doors shall implement one of the following:
 - (i) Perform an engineering review of the manufacturer's certified doors and door frames by a nationally recognized laboratory to certify that the door and door frames provide the required fire resistance rating, or
 - (ii) Test a replicate "as installed" door assembly by a nationally recognized laboratory to determine the door rating, or
 - (iii) Replace manufacturer's labeled doors and door frames with UL rated items.
- (e) Prior to startup after the first refueling outage, the licensee shall demonstrate the adequacy of its fire protection for record storage.

UNIT 2 - STATUS/CECO POSITION

- a) Commonwealth Edison Company officially requests the same exemptions for Unit 2. The areas listed in (a).(ii) are Unit 1 and Unit 2 areas. A similar license condition is appropriate for Unit 2.

- a) This item has been completed for Unit 2. Therefore, this condition should not appear in the Unit 2 license.
- c) This item is currently expected to be completed prior to license issue for Unit 2. Therefore, this condition should not appear in the Unit 2 license.
- d) This item also applies to Unit 2. A similar license condition is appropriate for Unit 2.
- e) Both Units utilize common record storage areas. Because this item is being tracked by the Unit 1 license, inclusion in the Unit 2 license is merely redundant and unnecessary. Therefore, this condition should not appear in the Unit 2 license.

UNIT 1 - LICENSE CONDITION

2.C.(26) Radiation/Chemistry Technicians on the Backshift (Section 13.1, SSER #2)

- (a) All Radiation/Chemistry Technicians on the backshift shall be trained per the LaSalle's Training Qualification Guide. All such Technicians shall also have satisfactorily completed the following emergency response training:
 - (i) Tasks to be performed during the first 60 minutes of a serious emergency on the backshift;
 - (ii) Post-accident sampling and analysis for the first three hours of an emergency;
 - (iii) In-plant radiation surveys during an accident;
 - (iv) Use and interpretation of both portable and fixed area radiation monitoring equipment, such as the Eberline PING-3 and SAM-2;
 - (v) Interpretation of critical effluent monitoring data for assisting the Chief Engineer during the first hour of an accident (i.e., station vent monitor and standby gas treatment monitor);
 - (vi) First aid and bioassay techniques; and
 - (vii) Use of respiratory equipment during emergency situations.
- (b) By June 1, 1983, the licensee shall have Radiation/Chemistry Technicians onshift for 24 hours per day who meet ANSI N18.1-1971 or who are qualified in accordance with a NRC approved alternative program.

UNIT 2 - STATUS/CECo POSITION

Reference (a): C. W. Schroeder letter to Director of Nuclear Reactor Regulation dated March 11, 1983.

- a) This item has been completed. Radiation/Chemistry Technicians serve both Units. Therefore, this condition should not appear in the Unit 2 license.
- b) The June 1, 1983 due date is prior to the currently expected August, 1983 fuel load. An alternate program has been submitted to the NRC by Reference (a) and includes appropriate Unit 1 license and Technical Specification changes. This item will be closed prior to Unit 2 license issue. Therefore, this condition should not appear in the Unit 2 license.

UNIT 1 - LICENSE CONDITION

2.C.(27) Industrial Security (Section 13.6, SER, SSER #3)

The licensee shall maintain in effect and fully implement all provisions of the Commission's approved physical security plan, guard training and qualification plan, and contingency plan, including amendments made pursuant to the authority of 10 CFR 50.54(p). The approved plans which contain safeguard information are collectively entitled: "LaSalle County Station Security Plan Units 1 and 2," Revision 11, dated December 24, 1981; "LaSalle County Station Guard Training and Qualification Plan," submitted by their letter dated August 16, 1979, as revised in August, 1980; and "LaSalle Nuclear Power Station Contingency Plan, dated March, 1980, as revised by pages dated June, 1980.

The licensee is exempt from the commitment to fully implement those portions of the Security Plan as described in Items 1 and 2 in the licensee's letter dated April 1, 1982, provided that the compensatory measures delineated in the above referenced letter are in place. Compensatory measures as described in Item 3 in the April 1, 1982, letter are approved with full implementation of the security plan commitments to be accomplished no later than July 1, 1982.

The licensee is exempted from the provisions of 10 CFR 73.55(d)(9), but shall meet all other commitments of the physical security plan and the following additional items.

- (a) Change all keys, locks, and combinations and related equipment used to control access to protected areas and vital areas at least every 12 months.
- (b) Issue keys, locks, combinations, and other access control devices to protected and vital areas only to those individuals who possess access authorization to those areas.
- (c) Change keys, locks, combinations, and related equipment to which an individual had access within 5 days and immediately for card keys after access authorization is withdrawn due to lack of trustworthiness, reliability, or inadequate work performance.

UNIT 2 - STATUS/CECo POSITION

Paragraph 1 - Needs updating through revision current at time of license issue. A similar item is appropriate for Unit 2.

- Paragraph 2 - One security plan is in effect for both units. The provisions of this paragraph have expired. Therefore, this condition should not appear in the Unit 2 license.
- Paragraph 3 - The security plan applies to both Units 1 and 2. Therefore, Commonwealth Edison Company officially requests the same exemptions for Unit 2. The same license condition is appropriate for Unit 2.

UNIT 1 - LICENSE CONDITION

2.C.(28) Initial Test Program (Section 14, SER)

The licensee shall conduct the post-fuel-loading initial test program (set forth in Section 14 of the licensee's Final Safety Analysis Report, as amended) without making any major modifications of this program unless modifications have been identified and have received prior NRC approval. Major modifications are defined as:

- (a) Elimination of any test identified in Section 14 of the licensee's Final Safety Analysis Report, as amended as being essential;
- (b) Modification of test objectives, methods or acceptance criteria for any test identified in Section 14 of the licensee's Final Safety Analysis Report, as amended as being essential;
- (c) Performance of any test at a power level different from that described in the program; and
- (d) Failure to complete any tests included in the described program (planned or scheduled for power levels up to the authorized power level).

UNIT 2 - STATUS/CECo POSITION

The same license condition is appropriate for Unit 2.

UNIT 1 - LICENSE CONDITION

2.C.(29) Assurance of Proper Design and Construction (Section 17.4, SSER #2)

Prior to exceeding 5 percent of full power, the licensee shall have conducted an independent review of the mechanical and structural design of the loop C residual heat removal system, excluding all branch piping less than 3 inches, in the functioning mode of the low pressure injection system using loads resulting from the actuation of the automatic depressurization system in conjunction with the operating basis earthquake to verify that this system has been designed and constructed in accordance with all pertinent NRC requirements. This verification review shall consider design, installation, inspection, testing, and any other aspects necessary to ensure conformance with the design. This review shall be performed independently of the licensee and its contractors who performed design and construction activities for the LaSalle County Station, and it shall be completed to the satisfaction of NRC.

UNIT 2 - STATUS/CECo POSITION

The Unit 1 Independent Design Review performed by Teledyne was completed to the satisfaction of the NRC. The design and construction of both Units 1 and 2 are essentially identical. It is the position of Commonwealth Edison Company that the conclusions from the Unit 1 Independent Design Review are representative of and directly applicable to LaSalle County Station Unit 2. Therefore, this condition should not appear in the Unit 2 license.

UNIT 1 - LICENSE CONDITION

2.C.(30) NUREG-0737 Conditions (Section 22.2)

The licensee shall complete the following conditions to the satisfaction of the NRC. These conditions reference the appropriate items in Section 22.2, "TMI Action Plan Requirements for Applicants for Operating Licenses," in the Safety Evaluation Report and Supplements 1, 2 and 3, NUREG-0519.

(a) Shift Technical Advisor (I.A.1.1, SER, SSER #2)

The Shift Technical Advisor (STA) function shall be fulfilled by the Station Control Room Engineer (SCRE) who will be a designated SRO. However, if a SCRE is not available, the licensee shall provide a fully-trained on-shift technical advisor to the shift engineer (shift supervisor).

UNIT 2 - STATUS/CECo POSITION

The STA (SCRE) position has been implemented, in accordance with Technical Specification 6.1.C.6 and Figure 6.1-3. Therefore, this condition should not appear in the Unit 2 license.

UNIT 1 - LICENSE CONDITION

2.C.(30).(b) Nuclear Steam Supply System Vendor Review of Procedures
(I.C.7, SER)

Prior to beginning low-power testing, the licensee must assure that the General Electric review of the power-ascension test procedures has been completed and the General Electric recommendations have been incorporated.

UNIT 2 - STATUS/CECo POSITION

The Unit 2 power ascension test procedures are essentially identical to the Unit 1 procedures, with allowances for lessons learned from Unit 1 testing. Therefore, further vendor review is unnecessary. This condition should not appear in the Unit 2 license.

UNIT 1 - LICENSE CONDITION

2.C.(30).(c) Independent Safety Engineering Group (I.B.1.2, SER)

The licensee shall have an on-site independent engineering group.

UNIT 2 - STATUS/CECo POSITION

The on-site independent engineering group has been implemented, in accordance with Technical Specification 6.1.C.5. Therefore, this condition should not appear in the Unit 2 license.

UNIT 1 - LICENSE CONDITION

2.C.(30).(d) Control Room Design Review (I.D.1, SER, SSER #2)

The licensee shall correct the design deficiencies identified in Appendix C of Supplement No. 1 to the Safety Evaluation Report, NUREG-0519 on the schedule prescribed therein.

UNIT 2 - STATUS/CECo POSITION

This will be addressed in Commonwealth Edison's response to Generic Letter 82-33. The NRC Commissioners negated any previous commitment dates with their issuance of the generic letter. Therefore, this condition should not appear in the Unit 2 license.

UNIT 1 - LICENSE CONDITION

2.C.(30).(e) Training During Low-Power Testing (I.G.1, SER, SSER #2)

At least 4 weeks prior to performing the Special Test, Simulated Loss of Onsite and Offsite Alternating-Current Power Test, the licensee shall provide a safety analysis for the test and its procedures to NRC for review and approval.

UNIT 2 - STATUS/CECo POSITION

This condition applied only to Unit 1. Because the station operations crew operates both units, the training and experience gained by the staff during the Unit 1 startup is directly applicable for any requirements for Unit 2. Therefore, this condition should not appear in the Unit 2 license.

UNIT 1 - LICENSE CONDITION

2.C.(30).(f) Post Accident Sampling (II.B.3, SSER #2)

Prior to criticality, the licensee shall install and test a high radiation sampling system for obtaining reactor coolant and containment atmosphere sampling under degraded core accident conditions without excessive exposure.

UNIT 2 - STATUS/CECo POSITION

Commonwealth Edison Company expects that the Unit 2 portions of the high radiation sampling system to be fully installed and tested prior to Unit 2 license issue. Therefore, this condition should not appear in the Unit 2 license.

UNIT 1 - LICENSE CONDITION

2.C.(30).(g) Direct Indication of Safety/Relief Valve Position (II.D.3, SER, SSER #2)

Prior to startup after the first refueling outage, the licensee shall replace the safety/ relief valve position indicator to a model that meets the IEEE Standards 323-1974 and 344-1975.

UNIT 2 - STATUS/CECo POSITION

Commonwealth Edison Company is attempting to complete this item prior to Unit 2 license issue. There are, however, potential hardware and delivery problems. If this item is not completed prior to Unit 2 license issue, the same license condition is appropriate for Unit 2.

UNIT 1 - LICENSE CONDITION

2.C.(30).(h) Additional Accident-Monitoring Instrumentation (II.F.1, SER, SSER #2)

Attachment 1, Noble Gas Effluent Monitor

Prior to criticality, the licensee shall install and have procedures approved by the NRC for noble gas effluent monitoring system at plant effluent pathways.

Attachment 2, Sampling and Analysis of Plant Effluents

Prior to criticality, the licensee shall install and have procedures approved by the NRC for radioiodine and particulate sampling and analysis system at plant effluent pathways.

UNIT 2 - STATUS/CECo POSITION

These items are common to Unit 1 and 2. As such, they were completed prior to Unit 1 criticality. Therefore, this condition should not appear in the Unit 2 license.

UNIT 1 - LICENSE CONDITION

2.C.(30).(i) Instrumentation for Detection of Inadequate Core Cooling
(II.F.2, SER, SSER #1, SSER #2)

By July 31, 1982, the licensee shall submit a report addressing the analysis performed by the BWR Owners Group regarding additional instrumentation relative to inadequate core cooling and that the licensee shall implement the staff's requirements after the completion of the staff's review of this report.

UNIT 2 - STATUS/CECo POSITION

The report addressing the analysis performed by the BWR Owners Group was submitted by July 31, 1982. Commonwealth Edison Company is waiting for the staff to complete their review of the report and determine their requirements.

UNIT 1 - LICENSE CONDITION

2.C.(30).(j) Proper Functioning of Heat Removal Systems (II.K.1.22, SER, SSER #2, and II.K.3.13, SER, SSER #2)

The license shall implement the logic to restart automatically the core isolation cooling system prior to startup after the first refueling outage.

UNIT 2 - STATUS/CECo POSITION

This change has been installed on Unit 2. Therefore, this condition should not appear in the Unit 2 license.

UNIT 1 - LICENSE CONDITION

2.C.(30).(k) Modify Break Detection Logic to Prevent Spurious Isolation of High Pressure Coolant Injection and Reactor Core Isolation Cooling System (II.K.3.15, SER, SSER #2)

Prior to startup after the first refueling outage, the licensee shall implement a circuit modification to assure that transients monitored by pressure instruments to sense flow in these two systems actually sense continuous high steam flow.

UNIT 2 - STATUS/CEC₀ POSITION

This modification has been installed on RCIC. Therefore, this condition should not appear in the Unit 2 license.

UNIT 1 - LICENSE CONDITION

2.C.(30).(1) Modification of Automatic Depressurization System Logic - Feasibility for Increased Diversity for Some Event Sequences (II.K.3.18, SER, SSER #1, SSER #3)

- (a) By October 1, 1982, the licensee shall evaluate the alternative design modifications of the BWR Owners Group relative to the logic for the automatic depressurization system, submit such evaluation, and propose modification to NRC for review and approval.
- (b) Prior to startup after the first refueling outage, the licensee shall implement the approved alternative logic modification of the automatic depressurization system.

UNIT 2 - STATUS/CECo POSITION

- a) Commonwealth Edison Company submitted this item prior to October 1, 1982. Commonwealth Edison Company has been waiting since October 1, 1982, for NRC approval of our proposal.

Commonwealth Edison Company continues to object to the concept of imposition of license conditions for which resolution is not within the direct control of Commonwealth Edison. The startup of a unit following the first refueling outage should not be constrained because the NRC may not have completed their review on a schedule to permit licensee action. Therefore, this condition should not appear in the Unit 2 license.

- b) Commonwealth Edison is proceeding with the installation of our proposed change. The same license condition is appropriate for Unit 2.

UNIT 1 - LICENSE CONDITION

2.C.(30).(m) Restart of Core Spray and Low Pressure Core Injection System
(II.K.3.21, SER, SSER #2)

Prior to startup after the first refueling outage, the licensee shall provide an auto start for the high pressure core spray.

UNIT 2 - STATUS/CECo POSITION

This change has been installed on Unit 2. Therefore, this condition should not appear in the Unit 2 license.

UNIT 1 - LICENSE CONDITION

2.C.(30).(n) Automatic Switchover of Reactor Core Isolation Cooling System Suction - Verify Procedures and Modify Design (II.K.3.22, SER)

Prior to startup after the first refueling outage, the licensee shall implement the automatic switchover of the reactor core isolation cooling system suction from the condensate storage tank to the suppression pool when the condensate storage tank is low.

UNIT 2 - STATUS/CEC_o POSITION

This change has been installed on Unit 2. Therefore, this condition should not appear in the Unit 2 license.

UNIT 1 - LICENSE CONDITION

2.C.(30).(o) Upgrade Emergency Support Facilities (III.A.1.2, SER, SSER #1)

The licensee shall complete its Emergency Response Facilities as follows:

- | | | |
|-------|---------------------------------|-------------------|
| (i) | Safety Parameter Display System | December 31, 1982 |
| (ii) | Emergency Operations Facility | December 31, 1982 |
| (iii) | Technical Support Center | October 1, 1982 |

UNIT 2 - STATUS/CECo POSITION

- (i) Commonwealth Edison Company currently expects this item to be completed on Unit 2 prior to Unit 2 license issue. Therefore, this condition should not appear in the Unit 2 license.
- (ii) This facility is common to both units. The EOF was completed by December 31, 1982. Therefore, this condition should not appear in the Unit 2 license.
- (iii) This facility is common to both units. The TSC was completed by October 1, 1982. Therefore, this condition should not appear in the Unit 2 license.

UNIT 1 - LICENSE CONDITION

2.C.(30).(p) Improving Licensee's Emergency Preparedness - Long Term
(III.A.2, SER, SSER #1, SSER #2)

- (1) Prior to exceeding the five percent power, the licensee shall complete a successful emergency exercise with the LaSalle facility and LaSalle County.
- (2) Prior to exceeding five percent power, a test shall be performed to demonstrate an adequate alerting/notification system.
- (3) Prior to exceeding five percent power, the licensee shall demonstrate the state of offsite preparedness provides assurance that adequate protective measures can and will be taken in the event of a radiological emergency. The use of 10 CFR 50(s)(2) to specify a period within which corrective actions must be taken to assure an adequate state of emergency preparedness will include instances where NRC finds that the lack of progress in completion of the procedures in the Federal Emergency Management Agency's proposed rule set forth in 44 CFR Part 350 is an indication that major substantive problems exist in achieving or maintaining an adequate state of preparedness. Any corrective period specified will relate to substantiate problems identified by the Federal Emergency Management Agency.
- (4) The licensee shall provide the interim meteorological improvement and shall provide the mechanism for long-term improvements as follows:
 - (i) Prior to exceeding five percent power, the licensee shall install a process computer with the capability to retrieve meteorological information that provides a redundant means for data access.
 - (ii) Prior to exceeding five percent power, the licensee shall propose a plan for meeting the meteorological and dose assesement capability guidance of Appendix 2, NUREG-0654, Revision 1 as follows:
 - installation of hardware and software capability described above by July 1, 1982; and
 - full operational capability described above by January 1, 1983.
 - (iii) Prior to exceeding five percent power, the licensee shall include a description of the dose calculational methodology with a Class A transport and diffusion module, and a description of an acceptable meteorological measurement preventative and corrective maintainance program in the radiological emergency plan.

2.C.(30).(p) Improving Licensee's Emergency Preparedness - Long Term
(III.A.2, SER, SSER #1, SSER #2) (Cont'd)

UNIT 2 - STATUS/CECo POSITION

All of the above items are common to both Units 1 and 2. All of the above items have been completed. Therefore, this condition should not appear in the Unit 2 license.

6085N

UNIT 1 - LICENSE CONDITION

2.C.(31) Bolting of Valves

Prior to January 15, 1983, the licensee shall check the torque on all non-pressure boundary bolts (bolts whose failure will effect the operability of the valve) on each safety-related valve located outside containment.

UNIT 2 - STATUS/CECo POSITION

Commonwealth Edison Company currently expects to complete this work on all safety-related valves inside and outside the containment prior to Unit 2 license issues. Therefore, this condition should not appear in the Unit 2 license.

UNIT 1 - LICENSE CONDITION

2.C.(32) Vacuum Breaker Valves

Prior to November 1, 1982, the licensee shall complete a test and shall submit its evaluation of the results which confirm the capability of the vacuum breaker valves to withstand the opening and closing forces associated with pool swell.

UNIT 2 - STATUS/CECo POSITION

The test evaluation was submitted prior to November 1, 1982. Commonwealth Edison Company has designed a bumper modification to restore margin. This modification has been installed on all 4 Unit 2 vacuum breaker valves. Therefore, this condition should not appear in the Unit 2 license.

UNIT 1 - LICENSE CONDITION

2.C.(33) Heating-Ventilation and Air Condition Systems

- (a) Prior to exceeding five percent power operation, the licensee must provide formal documentation of information regarding HVAC design fabrication and installation, discussed in meetings with the NRC on August 2 and 4, 1982.
- (b) Prior to exceeding fifty percent power operation, the licensee shall submit the results of an independent review acceptable to the NRC staff of the HVAC system, including design changes, fabrication, and installation. The review shall encompass all safety-related HVAC systems and the effect of non-safety related HVAC system failures on safety systems.

UNIT 2 - STATUS/CECo POSITION

- a) This item was completed as required. Therefore, this condition should not appear in the Unit 2 license.
- b) The independent review of the HVAC systems was submitted and found acceptable by the NRC. In H. R. Denton's Director Decision DD-83-1, it was stated that:

"Enclosure 3 further concluded that the NRC inspection of these matters applied equally to both Units 1 and 2 and found no technical issues relating to HVAC systems to preclude licensing and subsequent operation of Unit 2."

Therefore, this issue is closed and this condition should not appear in the Unit 2 license.

UNIT 1 - LICENSE CONDITION

2.C.(34) Through the First Fuel Cycle of Plant Operation, Technical Specification 3.4.1.1 is Modified for One Recirculation Loop out of Service with Provisions

- (a) The steady-state thermal power level will not exceed 50 percent of rated power.
- (b) The minimum critical power ratio (MCPR) safety limit will be increased by 0.01 to 1.07.
- (c) The minimum critical power ratio limiting condition for operation (LCO) will be increased by 0.01.
- (d) The maximum average planar linear heat generation (MAPLHGR) limit will be reduced by 0.85.
- (e) Technical Specification Setpoints shall read as follows:
 - T.S.2.2.1 $S \leq 0.66W + 45.7$ (Trip Setpoint)
 $S \leq 0.66W + 48.7$ (Allowable)
 - T.S.3.2.2 $S \leq (0.66W + 45.7) T^*$
 $S_{RB} \leq (0.66W + 36.7) T^*$
 T^* as defined in T.S.3.2.2
 - T.S.3.3.6 APRM Upscale $\leq 0.66W + 36.7$ (Trip Setpoint)
APRM Upscale $\leq 0.66W + 39.7$ (Allowable)
RBM Upscale $\leq 0.66W + 34.7$ (Trip Setpoint)
RBM Upscale $\leq 0.66W + 37.7$ (Allowable)
- (f) The average power range monitor (APRM) flux noise will be measured once per shift; and the recirculation loop flow will be reduced if the flux noise averaged over 1/2 hour exceeds 5 percent peak to peak, as measured by the APRM chart recorder.
- (g) The core plate delta P noise will be measured once per shift, and the recirculation loop flow will be reduced if the noise exceeds one (1) psi peak-to-peak.

UNIT 2 - STATUS/CECo POSITION

In order to allow flexibility in operations, Commonwealth Edison Company requests that the same license condition appear in the Unit 2 license.

UNIT 1 - LICENSE CONDITION

- 2.D. Exemptions from certain requirements of Appendices G, H and J and 10 CFR Part 73 are described in the Safety Evaluation Report and Supplement No. 1, No. 2 and No. 3 to the Safety Evaluation Report. In addition, an exemption was requested until the completion of the first refueling from the requirements of 10 CFR 70.24 and an exemption from 10 CFR Part 50, Appendix E from performing a full scale exercise within one year before issuance of an operating license, both exemptions are described in Supplement No. 2 of the Safety Evaluation Report. Finally, an exemption was requested from the requirements of 10 CFR 50.44 until either the required 100 percent rated thermal power trip startup test has been completed or the reactor has operated for 120 effective full power days as specified by the Technical Specifications. This latter exemption is described in the safety evaluation of License Amendment No. 12. These exemptions are authorized by law and will not endanger life or property or the common defense and security and are otherwise in the public interest. Therefore, these exemptions are hereby granted. The facility will operate, to the extent authorized herein, in conformity with the application, as amended, and the rules and regulations of the Commission (except as hereinafter exempted therefrom), and the provisions of the Act.

UNIT 2 - STATUS/CECo POSITION

1. The new fuel vault is common to both units. Commonwealth Edison Company therefore officially requests that the same exemption to 10 CFR 70.24 be granted until the completion of the first refueling outage on Unit 1.
2. Annual exercises are being conducted for the LaSalle facility. The next exercise is scheduled for July 12, 1983. Therefore, this exemption should not be required for the Unit 2 license.
3. Commonwealth Edison Company officially requests that the same exemption from 10 CFR 50.44 be granted for Unit 2.

UNIT 1 - LICENSE CONDITION

- 2.E. This license is subject to the following additional condition for the protection of the environment:

Before engaging in additional construction or operational activities which may result in a significant adverse environmental impact that was not evaluated or that is significantly greater than that evaluated in the Final Environmental Statement and its Addendum, the licensee shall provide a written notification to the Director of the Office of Nuclear Reactor Regulation and receive written approval from that office before proceeding with such activities.

UNIT 2 - STATUS/CEC POSITION

The same license condition is appropriate for Unit 2.

UNIT 1 - LICENSE CONDITION

2.F. Reporting to the Commission:

- (a) The licensee shall report any violations of the requirements contained in Section 2, Items C(1), C(3) through (33), and E of this license within twenty-four (24) hours by telephone and confirmed by telegram, mailgram, or facsimile transmission to the NRC Regional Administrator, Region III, or designee, not later than the first working day following the violation, with a written follow up report within fourteen (14) working days.
- (b) The licensee shall notify the Commission, as soon as possible but not later than one hour, of any accident at this facility which could result in an unplanned release of quantities of fission products in excess of allowable limits for normal operation established by the Commission.

UNIT 2 - STATUS/CECo POSITION

- a) A similar license condition is appropriate for Unit 2.
- b) The same license condition is appropriate for Unit 2.

UNIT 1 - LICENSE CONDITION

- 2.G. The licensee shall have and maintain financial protection of such type and in such amounts as the Commission shall require in accordance with Section 170 of the Atomic Energy Act of 1954, as amended, to cover public liability claims.

UNIT 2 - STATUS/CECo POSITION

The same license condition is appropriate for Unit 2.

UNIT 1 - LICENSE CONDITION

2.H. This license is effective as of the date of issuance and shall expire April 17, 2022.

UNIT 2 - STATUS/CECo POSITION

Commonwealth Edison Company officially requests that the Unit 2 license also be effective for 40 years from the date of issuance.

6085N