



Commonwealth Edison
1400 Opus Place
Downers Grove, Illinois 60515

January 20, 1994

Mr. J. B. Martin
Regional Administrator
U. S. Nuclear Regulatory Commission
Region III
801 Warrenville Road
Lisle, IL 60532-4351

Subject: LaSalle County Nuclear Power Station Unit 1
Request for Regional Enforcement Discretion Regarding Facility
Operating License NPF-11, Appendix A,
Technical Specification Surveillance Requirement 4.3.1.1
NRC Docket No. 50-373

Dear Mr. Martin:

This letter documents the results of the teleconference held on January 20, 1994, between Commonwealth Edison (CECo) and the NRC Staff, in which Commonwealth Edison requested a Notice of Enforcement Discretion (NOED) from Technical Specification Surveillance Requirement 4.3.1.1 for LaSalle County Unit 1.

Due to extremely low system reserve on the Commonwealth Edison Company (CECo) distribution system, CECOs System Power Supply office has requested that LaSalle Station stop performing any testing that could jeopardize the ability of a unit to supply power to the distribution system. At 6:00 P.M. CST on January 20, 1994 the monthly functional tests for three Reactor Protection System (RPS) Instrumentation "Functional Units" listed in Table 3.3.1-1 will exceed the specified monthly surveillance interval and the allowed factor of 1.25 times the surveillance interval. These RPS instrumentation surveillances cause multiple half-scrams (one of the two RPS trip systems tripped at a time). During half-scrum testing, a single equipment failure or error could cause a full reactor scram.

CECo requested that the functional test interval for these three surveillances be extended an additional 36 hours due to weather related high system load demand. A notice of enforcement discretion was verbally approved by Region III at 1:00 P.M. CST on January 20, 1994 for an additional 48 hours (instead of the 36 hours CECO requested). The additional 12 hours beyond what CECO requested is due to the uncertainty in the weather conditions and to ensure that there is adequate time to complete the surveillances under controlled conditions.

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The basis of the request is provided in the Attachment and includes:

- The Technical Specification that will be violated;
- The circumstances surrounding the condition, including the need for prompt action;
- The safety basis for the request that enforcement discretion be exercised, including an evaluation of the safety significance and potential consequences of the proposed course of action;
- Any proposed compensatory measure(s);
- The justification for the duration of the request;
- The basis for the conclusion that the request will not have a potential adverse impact on the public health and safety and that a significant safety hazard is not involved;
- The basis for the conclusion that the request will not involve adverse consequences to the environment.

With Unit 1 in operating condition 1 (Run Mode), the surveillances will be performed as soon as the CEC system power supply conditions allow, but no later than the additional 48 hours that were granted (i.e., prior to 6:00 P.M. CST on January 22, 1994).

This request for Enforcement Discretion has been reviewed and approved by the LaSalle County On-Site Review Committee, in accordance with LaSalle County Station procedures.

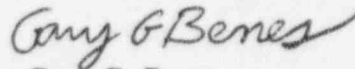
Mr. J. B. Martin

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CECo sincerely appreciates the NRC staff's effort and participation in the review of this request. Please direct any questions or comments to Gary Benes, Nuclear Licensing Administrator, at (708) 663-7282.

Very truly yours,

A handwritten signature in cursive script that reads "Gary G. Benes".

Gary G. Benes

Nuclear Licensing Administrator

Attachment

cc: B. Clayton, Region III Branch Chief
D. Hills, Senior Resident Inspector - LaSalle County
A. T. Gody, Jr., Project Manager - NRR
NRC Document Control Desk

ATTACHMENT

1. TECHNICAL SPECIFICATION OR LICENSING CONDITION THAT WILL BE VIOLATED

At 6:00 P.M. CST on January 20, 1994, LaSalle County Station Unit 1 Technical Specification Surveillance Requirement 4.3.1.1 monthly functional tests for three Reactor Protection System Instrumentation "Functional Units" listed in Table 3.3.1-1 will exceed the specified monthly surveillance interval and the allowed factor of 1.25 times the surveillance interval. The reactor protection system instrumentation surveillances are for item 5, Main Steam Line Isolation Valve - Closure; item 9, Turbine Stop Valve - Closure; and item 10, Turbine Control Valve Fast Closure, Valve Trip System Oil Pressure - Low. At 6:00 P.M. CST on January 20, 1994, per specification 4.0.3, the associated instrumentation must be declared inoperable:

4.0.3 Failure to perform a Surveillance Requirement within the specified time interval shall constitute a failure to meet the OPERABILITY requirements for a Limiting Condition for Operation. Exceptions to these requirements are stated in the individual Specifications. Surveillance requirements do not have to be performed on inoperable equipment.

With these trip functions inoperable, Technical Specification Limiting Condition for Operation 3.3.1 Action b. requires the following:

ACTION b. With the number of OPERABLE channels less than required by the Minimum OPERABLE Channels per Trip System requirement for both trip systems, place at least one trip system in the tripped condition within 1 hour and take the ACTION required by Table 3.3.1-1.

Per Table 3.3.1-1, the Action required for the Main Steam Line Isolation Valve - Closure Reactor Protection System Instrument channels being inoperable is:

ACTION 4 - Be in at least STARTUP within 6 hours.

Per Table 3.3.1-1, the Action required for the Turbine Stop Valve - Closure and the Turbine Control Valve Fast Closure, Valve Trip System Oil Pressure - Low Reactor Protection System Instrument channels being inoperable is:

ACTION 6 - Initiate a reduction in THERMAL POWER within 15 minutes and reduce turbine first stage pressure to ≤ 140 psig, equivalent to THERMAL POWER less than 30% of RATED THERMAL POWER, within 2 hours.

Therefore, Commonwealth Edison requests Enforcement Discretion from Technical Specification Surveillance Requirement 4.3.1.1 to extend the functional test interval for the reactor protection system instrumentation surveillances item 5, Main Steam Line Isolation Valve - Closure; item 9, Turbine Stop Valve - Closure; and item 10, Turbine Control Valve Fast Closure, Valve Trip System Oil Pressure - Low for an additional 36 hours to be able to restore the low Power Supply system reserve margin due to weather related high system load demand and severe winter weather.

2. CIRCUMSTANCES SURROUNDING THE SITUATION

Due to extremely low system reserve on the Commonwealth Edison Co. (CECo) distribution system, CEC Co System Power Supply office has requested that LaSalle station stop performing any testing that could jeopardize the ability of a unit to supply power to the distribution system. The Reactor Protection System (RPS) instrumentation surveillances cause multiple half-scrams (one of the two RPS trip systems tripped at a time). During half-scrum testing, a single equipment failure or error could cause a full reactor scram. Therefore, all half-scrum testing and main turbine surveillances have been put on hold until an adequate reserve margin based on power availability and system stability is reestablished. The surveillances in question will be past the allowed surveillance interval of 38.75 days (1.25 times the monthly frequency of 31 days) on January 20, 1994 at 6:00 P. M. CST. Due to current system demand, power is being purchased from utilities in the eastern United States. The utilities in the east are experiencing weather related system power problems and may not be able to continue to meet the eastern system grid needs. Relief from these conditions is expected within 36 hours.

3. EVALUATION OF SAFETY SIGNIFICANCE AND CONSEQUENCES

The change involves the functional testing interval of selected instrumentation in the RPS system. The instrumentation is fully operable and this testing only confirms that between calibration tests that the components remain operable. By extending the testing interval 36 hours the potential for instrument failure is not increased; however, the ability to detect a failure is slightly delayed. Redundant channels exist to accommodate the low probability of a component failure. The components in RPS are "fail safe" such that some failure mechanisms are immediately detectable. Reactor Protection System Instrumentation functional tests were completed for the APRMs on January 19, 1994, assuring that the scram channels are Operable. In any case the slight extension of the interval has minimal impact on safety.

4. COMPENSATORY ACTIONS

The following Compensatory Actions will be placed in effect:

- 1) The last Unit 1 surveillances, testing the MSIVs, Turbine Stop and Control Valves, were verified to be performed satisfactorily on December 13, 1993, beginning at 0030 hours CST(12:30 A.M) and ending at 0300 hours (3:00 A.M.).
- 2) The recent concerns on Unit 2 have been evaluated and are not considered to be an issue on LaSalle Unit 1 based on the performance of the past Unit 1 surveillances. The past five surveillances for the surveillances in 1) above have been reviewed and verified to be satisfactory. During the initial teleconference with the NRC on January 20, 1994, the NRC asked if there were any anomalies that occurred during the past five surveillances that were not recorded. Several of the operators who performed the surveillances were interviewed, and none of the operators that were interviewed were aware of unrecorded anomalies.

5. JUSTIFICATION FOR THE DURATION OF THE REQUEST:

The requested time extension for deferring the required surveillance is 36 hours. The time requested is based on the following information:

- The current cold wave in the immediate area is expected to continue for approximately 24 hours. The high demand for Electricity has the Commonwealth Edison System operating with no extra power reserve. Any loss of a large source of power, such as LaSalle Unit 1, reduces the margin of electrical grid stability on the Midwest Grid.
- Commonwealth Edison is currently purchasing power in order to maintain system grid stability. This condition is expected to continue until system load requirements lessen due to the midwest weather conditions improving and LaSalle Unit 2 is on line and ramping up in power. Midwest weather improvements are expected through the weekend. Unit 2 is now on line and ramping up in power.
- The current weather conditions on the East coast have impacted the Eastern Utilities and the Electrical Grid System. Some utilities have commenced Emergency Load Conservation Procedures and rolling Blackouts.

- The National Grid System from the Rocky Mountains to the East Coast has reduced Grid voltage by 5% in order to increase the margin of protection to the System.
- The speed of the Cold weather front is unpredictable and the most accurate estimate for duration for this emergency is 36 hours.
- With Unit 1 in Operating Condition 1 (Run Mode), the surveillances will be performed as soon as the CECO system power supply conditions allow, but not later than 0600 hours (6:00 A.M. CST) on January 22, 1994.
- If a Reactor Protection System Instrument Channel becomes inoperable during the time of Enforcement Discretion, then the Technical Specification Actions will be followed.

The safety significance associated with the duration of this request is minimal. The request for 36 hours additional time is being requested for Monthly surveillances. The General Electric Topical Reports (References 1 and 2), provide justification for extending the surveillance frequency from monthly to quarterly for numerous surveillances including these at issue. Reference 1 has been used by other utilities to change Technical Specifications to reflect this surveillance extension. Reference 2 demonstrates that LaSalle County Station Units 1 and 2 are bounded by the analyses approved in Reference 1 by the NRC. Commonwealth Edison is currently in the process of final approval of this Technical Specification request for submittal to the NRC. Part of the basis included increasing the frequency of the Manual Scram Reactor Protection System Instrumentation channel functional test from monthly to weekly. The NRC has concurred with this conclusion in its review of the topical reports. Although the Manual Scram functional tests have not been recently been done, the APRM functional tests were performed on January 19, 1994, verifying the Reactor Protection System channels are Operable.

6. EVALUATION OF SIGNIFICANT HAZARDS CONSIDERATION

Commonwealth Edison has evaluated the proposed request for Enforcement Discretion and determined that it does not represent a significant hazards consideration. Based on the criteria for defining a significant hazards consideration established in 10 CFR 50.92, operation of LaSalle County Station Unit 1 in accordance with the proposed request will not:

- 1) Involve a significant increase in the probability or consequences of an accident previously evaluated because:

The proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated. The proposed changes increase the surveillance test interval (STI) for RPS instrumentation. There are no changes to the systems themselves. Because of this, there is no change in the probability of an occurrence of an accident or the consequences of an accident or the consequence of a malfunction of equipment. With respect to the malfunction of equipment, topical reports (References 1 and 2) prepared by GE demonstrated that there is a reduction in scram frequency for the RPS. Part of this basis included increasing the frequency of the Manual Scram Reactor Protection System Instrumentation channel functional test from monthly to weekly. The NRC has concurred with this conclusion in its review of the topical reports. Although the Manual Scram functional tests have not recently been done, the APRM functional tests were performed on January 19, 1994, verifying the Reactor Protection System channels are Operable. The proposed changes are consistent with the safety evaluation reports issued in these topical reports. The proposed changes therefore do not involve a significant increase in the probability or consequences of an accident previously evaluated.

- 2) Create the possibility of a new or different kind of accident from any accident previously evaluated because:

The proposed changes do not create the possibility for an accident or malfunction of a different type than any evaluated previously in the UFSAR. The proposed changes increase the STI for RPS instrumentation functional tests. There are no changes to the systems. Since there are no system changes there is no possibility of a different accident or malfunction type than any previously evaluated.

- 3) Involve a significant reduction in the margin of safety because:

The proposed changes do not reduce the margin of safety as defined in the basis for any Technical Specification. The proposed changes do not change any setpoints in the RPS system or the levels of redundancy. Setpoints are based on drift occurring between specified calibration intervals and not on functional test frequencies. The bases either do not discuss the STI or state "... one channel may be inoperable for brief intervals to conduct required surveillance." The change in functional test frequency does not affect this basis. Based on the analysis prepared by GE and approved by the NRC, which examined the effects of extending the STI, a significant reduction in the margin of safety does not exist.