Commonwealth Edison
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July 21, 1983

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Subject: LaSalle County Station Unit 2
Completion of LSCS Unit 2
Preoperational Test Program
NRC Docket No. 50-374

References (a): LSCS FSAR Chapter 14.

(b): LSCS Unit 1 Technical Specifications, License NPF-11.

(c): D. G. Eisenhut letter to L. O. DelGeorge dated May 3, 1982.

(d): W. L. Stiede letter to H. R. Denton dated June 21, 1983.

Dear Mr. Denton:

Reference (a) describes the LSCS preoperational and startup test program. Commonwealth Edison Company's original intentions were to complete the entire preoperational test program prior to fuel load. However, it has become apparent that certain portions of a relatively small number of preoperational tests and system demonstrations have become the controlling items for fuel load. The delays in completing these tests are due to a variety of design, delivery, and installation problems.

Commonwealth Edison has reviewed the remaining preoperational testing, considering both the safety aspects of the individual systems and the anticipated system completion dates. Several of the systems and subsystems involved have been determined to have no impact on plant safety during shutdown and fuel loading conditions. This determination is based on the Unit 1 Technical Specifications (Reference (b)), and, where the Technical Specifications have no specific requirements, prudent judgment. The Unit 1 Technical Specifications were used because of the fluid state of the proposed Unit 2 Specifications; however, no differences between the two are expected to affect the justifications provided.

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The Attachment presents the results of Commonwealth Edison's review and justification that these systems and subsystems should not be required to be tested or operable as a prerequisite for fuel load. It is requested that approval be granted to defer the completion of the

preoperational tests listed on the Attachment beyond fuel load. With the exception of Primary Containment Isolation and Process Sampling, no parts of any of the systems listed are required. For these two tests, test evaluations will be completed prior to fuel load to ensure the adequacy of the portions of the systems required to support fuel load.

It should be noted that in a majority of cases it is anticipated that the physical testing will be completed prior to fuel load. The delay in the date required for test completion will allow additional time to ensure a thorough evaluation and review of the test results. Also included on the Attachment are the appropriate milestones in the Startup Test Program prior to which the tests and test evaluations must be completed.

A review of Chapter 14 of the FSAR has revealed that several of the startup test abstracts list, as an Initial Condition, "All construction and preoperational testing completed." Approval by the NRC to defer completion of preoperational tests is understood to include authorization to deviate from this startup test prerequisite until the specified milestone is attained.

Reference (c) extended the expiration of the Unit 2 Construction Permit CPPR-100 to September 30, 1983. Reference (d) stated that our review of the schedule of construction activities and preoperational testing indicated that fuel can be loaded in LaSalle County Unit 2 not later than October 1, 1983. This determination remains unchanged. Commonwealth Edison Company requests that the NRC provide a prompt review and approval of this preoperational test deferral request so that priorities and schedules may be implemented to assure that our license will be issued prior to Construction Permit CPPR-100 expiration and fuel load will be allowed to commence in September, 1983.

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

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

Very truly yours,

Cordell Reed

Cordell Reed
Vice-President

CWS/lm

cc: A. Bournia (Fed. Express)
J. G. Keppler - RIII
NRC Resident Inspector - LSCS

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Requested Preoperational Test Program Exceptions

TEST	TEST SECTIONS	JUSTIFICATION	COMPLETION REQUIRED PRIOR TO
PT-CM-201 Containment Monitoring	ALL	No equipment in this test is required operable during cold shutdown or refueling operations.	Initial Criticality
PT-CM-202 Post LOCA Containment Monitoring	ALL	No equipment in this test is required operable during cold shutdown or refueling operations.	Initial Criticality
PT-IN201 Drywell Pneumatics	ALL	No equipment operated by drywell pneumatics is required operable during cold shutdown or refueling operations.	Initial Criticality
PT-LD201 Leakage Detection	ALL	No leakage detection equipment is required operable during cold shutdown or refueling operations.	Initial Criticality
PT-MS201A MSIV Leakage Control System	ALL	The MSIV Leakage Control System is not required operable during cold shutdown or refueling operations.	Initial Criticality
PT-MS201B MSIV's and MS Instrumentation	ALL	No equipment in this test is required operable during cold shutdown or refueling operations.	Initial Criticality
PT-MS201C ADS and MS Safety/Relief	ALL	No equipment in this system is required to be operable until the reactor is critical and above 122 psig. Per FSAR Chapter 14, this test is to be finished during heatup in the startup test program.	Initial Heatup, prior to exceeding 122 psig.

TEST	TEST SECTIONS	JUSTIFICATION	PROPOSED COMPLETION
PT-NR202 Traversing Incore Probe	ALL	No equipment in this system is required during cold shutdown or refueling operations.	Initial Criticality
PT-OG201 Off-Gas	ALL	No equipment in this system is required during cold shutdown or refueling operations.	Initial Criticality
PT-PC201 Primary Containment Integrity	ALL	Primary Containment Integrity is not required during cold shutdown or refueling operations.	Initial Criticality
PT-PC203 Containment Isolation Systems	Everything except Secondary Containment Isolations	Only secondary containment integrity is required during refueling operations. Primary containment cannot be maintained while fueling.	Initial Criticality
PT-RI201 Reactor Core Isolation Cooling	ALL	No equipment in this system is required during cold shutdown or refueling operations.	Initial Criticality
PT-RP202 Remote Shutdown	ALL	The remote shutdown system is not required during cold shutdown or refueling operations.	Initial Criticality
PT-RR201 Reactor Recirculation	ALL	The reactor recirculation and flow control system is not required operable during cold shutdown or refueling operations.	Initial Criticality

TEST	TEST SECTIONS	JUSTIFICATION	PROPOSED COMPLETION
PT-SI202 Pipe Vibration Monitoring	ALL	The probability of a severe transient (e.g., seismic, LOCA) occurring during the preoperational test program that could damage system piping or components if the dynamic restraints are not installed is acceptably low; and the testing will be completed prior to power operation which would generate decay heat and fission product inventory. Therefore, the use of these systems will not be required to protect the health and safety of the public prior to the tests.	Initial Heat-up
PT-VP202 Post LOCA Hydrogen Recombiners	Portions involving Unit 2 (Both recombiners have been demonstrated with the Unit 1 containment	The hydrogen recombiner are not required to support Unit 2 during cold shutdown and refueling operations.	Initial Criticality
PT-VP203 Containment Ventilation	ALL	Containment ventilation is not required to maintain temperatures until after reactor heatup has occured and the reactor is adding heat to the containment.	Initial Heat-up
SD-PS201 Process Sampling	All portions other than those necessary to monitor reactor water quality	No requirements exist to maintain water quality other than for the reactor water.	Initial Criticality
SD-SA201 Service and Instrument Air	ALL	This system is non-safety related. Although it supplies some safety-related components, they are designed to fail in the conservative direction upon loss of air. This system has been in operation for a year, and has been a reliable air source.	Initial Criticality
SD-SI201	ALL	For the same reasons as applied to PT-SI202 (above).	Initial Heat-up