



Commonwealth Edison

1400 Opus Place
Downers Grove, Illinois 60515

October 24, 1994

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D.C. 20555

SUBJECT: LaSalle County Nuclear Power Station Units 1 and 2 Request for Exemptions from 10 CFR Appendix J and Request for Amendment to Facility Operating Licenses NPF-11 and NPF-18, Appendix A, Technical Specifications Section 3.6
NRC Docket Nos. 50-373 and 50-374

Pursuant to 10 CFR 50.12(a), Commonwealth Edison (ComEd) requests a one-time exemption from 10 CFR Appendix J for LaSalle Unit 2 to return to a CILRT Type A test schedule of three times in ten years and a permanent exemption from 10 CFR 50 Appendix J for LaSalle Units 1 and 2 to decouple the CILRT Type A test Schedule from the ISI schedule. Pursuant to 10 CFR 50.90, ComEd proposes to amend Appendix A, Technical Specifications Section 3.6 of Facility Operating Licenses NPF-11 and NPF-18.

Due to consecutive failures, 10 CFR 50 Appendix J and LaSalle Unit Two Technical Specification Surveillance Requirements require that Type A tests be performed every refueling outage on Unit Two until two consecutive Type A tests are satisfactory. LaSalle Unit Two Technical Specification Surveillance Requirements and Appendix J also require a Type A test to be performed when the plant is shutdown for the 10-year plant inservice inspections. The next refueling outage, the sixth for Unit 2, is the last refueling outage of the first ten year ISI period. Therefore a Type A test is required to be conducted due to consecutive failures and because the upcoming refueling outage is the last outage of the first ten year ISI period. In conjunction with these exemptions, Technical Specifications are required to be changed to allow for exemptions for LaSalle Unit 2 and for uniformity, Unit 1.

The proposed exemption requests and Technical Specification Amendment are subdivided as follows:

1. Attachment A gives a description and safety analysis of the proposed changes.
2. Attachment B includes the proposed changes to the Technical Specifications pages for LaSalle Units 1 and 2.

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3. Attachment C describes ComEd's evaluation performed in accordance with 10 CFR 50.92 (c), which confirms that no significant hazard consideration is involved.
4. Attachment D is an Exemption Request from Appendix J Requirements for the Type A Test Increased Frequency as a Result of Consecutive Failures.
5. Attachment E is an Exemption Request from Appendix J Requirements for the Type A Normal Test Schedule, Separating the Type A Test Schedule from the Inservice Inspection Schedule.
6. Attachment F is a Corrective Action Plan for Type C Test Failures Contributing to "As-found" Type A test Failures
7. Attachment G is a Previous and Proposed Type A Test Schedule.
8. Attachment H provides the Environmental Assessment Applicability Review.

These proposed exemptions and Technical Specification amendment have been reviewed and approved by ComEd On-Site and Off-Site Review in accordance with ComEd procedures.

The requested approval timeframe is March 15, 1995 in order to remove the currently scheduled Type A test and associated activities from the LaSalle Unit 2 sixth refueling outage scope.

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

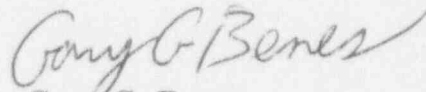
Commonwealth Edison is notifying the State of Illinois of this application for amendment by transmitting a copy of this letter and its attachments to the designated state official.

USNRC

October 24, 1994

Please direct any questions you may have concerning this submittal to this office.

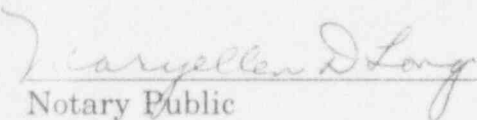
Very truly yours,



Gary G. Benes

Nuclear Licensing Administrator

Subscribed and Sworn to before me
on this 24th day of
October, 1994.


Notary Public

Attachments:

- A. Description and Safety Analysis of the Proposed Changes
- B. Marked-Up Technical Specification Pages
- C. Evaluation of Significant Hazards Considerations
- D. Exemption Request from Appendix J Requirements for the Type A Test Increased Frequency as a Result of Consecutive Failures.
- E. Exemption Request from Appendix J Requirements for the Type A Normal Test Schedule, Separating the Type A Test Schedule from the Inservice Inspection Schedule.
- F. Corrective Action Plan for Type C Test Failures Contributing to "As-found" Type A test Failures
- G. Previous and Proposed Type A Test Schedule.
- H. Environmental Assessment Applicability Review

cc: J. B. Martin, Regional Administrator - RIII
P. G. Brochman, Senior Resident Inspector - LSCS
W. D. Reckley, Project Manager - NRR
Office of Nuclear Facility Safety - IDNS

ATTACHMENT A
DESCRIPTION OF SAFETY ANALYSIS OF THE PROPOSED CHANGES

Description of the Proposed Change

This request for exemptions from 10 CFR 50 Appendix J and a license amendment request includes the following proposed exemptions/changes:

Proposed Exemptions:

1. LaSalle County Station (LaSalle) Unit 2 has experienced Containment Integrated Leak Rate Test (CILRT) (Type A test) failures for the "as-found" condition at the first, third and fourth refueling outages as a result of penalties from Local Leak Rate Test (LLRT) (Type B and C) failures. Therefore the requirements of 10 CFR 50 Appendix J, Section III.A.6(b) are applicable, necessitating that a Type A test be performed at both the fifth refueling outage (L2R05) and the sixth refueling outage (L2R06) due to consecutive "as-found" Type A test failures. The Type A test performed at the end of L2R05 was acceptable in the as-found condition.

ComEd is requesting a one-time exemption to allow LaSalle County Station Unit Two to return to or resume a Type A test schedule of three times in ten years. Due to consecutive failures, 10 CFR 50 Appendix J and LaSalle Unit Two Technical Specification Surveillance Requirements require that Type A tests be performed every refueling outage on Unit Two until two consecutive Type A tests are satisfactory. In conjunction with this exemption, Technical Specifications are required to be changed to allow for exemptions for LaSalle Unit 2 and for uniformity, Unit 1. See Attachment D for this exemption request.

2. In addition to the increased frequency requirements of 10 CFR 50 Appendix J, Section III.A.6(b), and Technical Specification Surveillance Requirements, a Type A test is required to be performed in the LaSalle Unit 2 sixth refueling outage, L2R06, for another reason. 10 CFR 50 Appendix J, Section III.D, and Technical Specification Surveillance Requirements include a requirement to perform the third Type A test of each set of three in ten years, when the plant is shutdown for the 10-year plant inservice inspections. L2R06 is the last scheduled refueling outage of the first 10 year Inservice Inspection (ISI) period. Therefore, a Type A test is required to be performed in L2R06.

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DESCRIPTION OF SAFETY ANALYSIS OF THE PROPOSED CHANGES

Description of the Proposed Change (continued)

ComEd is requesting a permanent exemption from 10 CFR 50 Appendix J, Section III.D, to decouple the Type A test schedule from the ISI schedule and a corresponding change to the Technical Specification for each unit. Without this exemption and amendment, a Type A test is required to be performed during the LaSalle Unit 2 sixth refueling outage, L2R06. See Attachment E for this exemption request.

Proposed Amendments to Technical Specifications:

1. LaSalle Unit 1 and 2 Technical Specification Surveillance Requirements 4.6.1.2 restate the requirements of 10 CFR 50 Appendix J for periodic leakage rate testing for Type A tests and therefore must be changed in conjunction with the requests for exemption from 10 CFR 50 Appendix J. The remainder of the surveillance requirements address Type B and C testing and the exceptions provided by Appendix J with an approved exemption concerning Main Steam Isolation Valve leakage test requirements.

The proposed amendment deletes Technical Specification 3/4.6.1.2, Primary Containment Leakage, and Surveillance Requirements 4.6.1.1.a, 4.6.4.3, and 4.6.6.1.d. The specifications deleted are replaced by a new surveillance requirement in Technical Specification 3/4.6.1.1, Primary Containment Integrity, that will require primary containment leakage tests to be performed in accordance with, and at a frequency specified by, 10 CFR 50, Appendix J, and approved exemptions.

Also, the Surveillance Requirements of Technical Specification 3/4.6.1.2 are referenced in specification 3/4.6.1.3, which will require change to correct the reference to agree with the numbering changes as a result of the deletion of Technical Specification 3/4.6.1.2.

2. Technical Specification Table 3.6.3-1, Primary Containment Isolation Valves, is proposed to be removed from Technical Specifications per Generic Letter 91-08 (Reference n). This includes deleting of the references to the Table in other specifications in accordance with the Generic Letter.

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DESCRIPTION OF SAFETY ANALYSIS OF THE PROPOSED CHANGES

Description of the Proposed Change (continued)

3. The surveillance test interval for the hydrogen recombiner functional test is proposed to be changed from a 6 month surveillance interval to an 18 month surveillance interval per Generic Letter 93-05 (Reference p). Generic Letter 93-05 also changes the frequency of "At least once per 18 months" to "At least once each REFUELING INTERVAL". This is based on changes recommended in Generic Letter 91-04, Changes in Technical Specification Surveillance Intervals to Accommodate a 24-Month Fuel Cycle (Reference r). LaSalle is not proposing changes from "At least once per 18 months" to "At least once each REFUELING INTERVAL" at this time, because of the additional changes that would be required per Generic Letter 91-04.

Description of the Current Operating License/Technical Specification Requirement

1. LaSalle Unit 1 and 2 Technical Specification 3/4.6.1.2. restates the requirements of 10 CFR 50 Appendix J for periodic leakage rating testing for Type A, B, and C tests:
 - a. The Limiting Condition for Operation (LCO) states the limits for Primary Containment leakage rates.
 - b. The Applicability states the following:

"When PRIMARY CONTAINMENT INTEGRITY is required per Specification 3.6.1.1."
 - c. The Action statements reflect restoration of any excess leakage to within the limits prior to "increasing reactor coolant system temperature above 200 °F".
 - d. Surveillance Requirement 4.6.1.2 states the following:

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DESCRIPTION OF SAFETY ANALYSIS OF THE PROPOSED CHANGES

Description of the Current Operating License/Technical Specification Requirement (continued)

"4.6.1.2. The primary containment leakage rates shall be demonstrated at the following test schedule and shall be determined in conformance with the criteria specified in Appendix J of 10 CFR Part 50 using the methods and provisions of ANSI N45.4-1972:"

Parts a, b and c discuss the requirements for Type A Overall Integrated Containment Leakage Rate tests. Parts d, e, f, g, and h give the requirements for Type B and C tests and include both exemptions from Appendix J as well as exceptions provided by Appendix J for certain primary containment penetration types. Part i disallows the surveillance test interval extension provided by specification 4.0.2 for the surveillance test intervals of 24 and 40 months to assure compliance with test intervals required by Appendix J.

- e. Surveillance Requirement 4.6.1.1.a, for the specification 3/4.6.1.1, PRIMARY CONTAINMENT INTEGRITY, discusses the requirements of 10 CFR 50, Appendix J with respect to penetrations subject to Type B testing and requires the following:

"4.6.1.1.a After each closing of each penetration subject to Type B testing, except the primary containment air locks, if opened following Type A or B test, by leak rate testing the seal with gas at P_a , 39.6 psig, and verifying that when the measured leakage rate for these seals is added to the leakage rates determined pursuant to Surveillance Requirement 4.6.1.2.d for all other Type B and C penetrations, the combined leakage rate is less than or equal to $0.60 L_a$."

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DESCRIPTION OF SAFETY ANALYSIS OF THE PROPOSED CHANGES

Description of the Current Operating License/Technical Specification Requirement (continued)

- f. Surveillance Requirement 4.6.4.3, for LCO 3.6.4, "All suppression chamber - drywell vacuum breakers shall be OPERABLE and closed", discusses the requirements of 10 CFR 50, Appendix J with respect to the suppression chamber - drywell vacuum breaker header flanges and requires the following:
- "4.6.4.3 Vacuum breaker header flanges which have been broken shall be leak tested after re-making by Type B test at 39.6 psig per Specification 4.6.1.2.d."
- g. Surveillance Requirement 4.6.6.1.d, for the LCO 3.6.6.1, "Two independent drywell and suppression chamber hydrogen recombiner systems shall be OPERABLE," discusses the requirements of 10 CFR 50, Appendix J with respect to the hydrogen recombiner systems and requires the following:
- "4.6.6.1.d. By measuring the leakage rate:
1. As a part of the overall integrated leakage rate test required by Specification 3.6.1.2, or
 2. By measuring the leakage rate of the system outside of the containment isolation valves at P_a , 39.6 psig, on the schedule required by Specification 4.6.1.2 and including the measured leakage as a part of the leakage determined in accordance with Specification 4.6.1.2."
- h. The following specifications reference Technical Specification 3/4.6.1.2, and will require change to correct the reference:
- 1) Definition 1.31 (in part):
- "PRIMARY CONTAINMENT INTEGRITY shall exist when:
- d. The primary containment leakage rates are within the limits of Specification 3.6.1.2."

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DESCRIPTION OF SAFETY ANALYSIS OF THE PROPOSED CHANGES

Description of the Current Operating License/Technical Specification Requirement (continued)

- 2) "4.6.2.1.d By conducting drywell-to-suppression chamber bypass leak tests and verifying that the A/\sqrt{k} calculated from the measured leakage is within the specified limit when drywell-to-suppression chamber bypass leak tests are conducted:
 - 1. At least once per 18 months at an initial differential pressure of 1.5 psi, and
 - 2. At the first refueling outage and then on the schedule required for Type A Overall Integrated Containment Leakage Rate tests by Specification 4.6.1.2.a; at an initial differential pressure of 5 psi,except that, if the first two ..."
- 2. LaSalle Unit 1 and 2 Technical Specification 3/4.6.3, Primary Containment Isolation Valves, includes Table 3.6.3-1, Primary Containment Isolation Valves, which specifically identifies the individual components by their plant identification number. This list of components is referenced in or by several Technical Specification Limiting Conditions for Operation and Surveillance Requirements, including the definition of Primary Containment Integrity. The following specifications refer to Table 3.6.3-1 in LaSalle Unit 1 and 2 Technical Specifications:
 - a. Definition 1.31 (in part):

"PRIMARY CONTAINMENT INTEGRITY shall exist when:

 - a. All primary containment penetrations required to be closed during accident conditions are either:
 - 1. Capable of being closed by an OPERABLE primary containment automatic isolation system, or"

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DESCRIPTION OF SAFETY ANALYSIS OF THE PROPOSED CHANGES

Description of the Current Operating License/Technical Specification Requirement (continued)

- "2. Closed by at least one manual valve, blind flange, or deactivated automatic valve secured in its closed position, except as provided in Table 3.6.3-1 of Specification, 3.6.3."
- b. Table 3.3.2-1, Isolation Actuation Instrumentation, footnote (a):
 - "(a) See Specification 3.6.3, Table 3.6.3-1 for valves in each valve group."
- c. Table 3.3.2-3, Isolation System Instrumentation Response Time, footnote #:
 - "# Isolation system instrumentation response time specified for the Trip Function actuating each valve group shall be added to isolation time shown in Table 3.6.3-1 and 3.6.5.2-1 for valves in each valve group up to obtain ISOLATION SYSTEM RESPONSE TIME for each valve."
- d. Surveillance Requirement 4.6.1.1.b:
 - "b. At least once per 31 days by verifying that all primary containment penetrations not capable of being closed by OPERABLE containment automatic isolation valves and required to be closed during accident conditions are closed by valves, blind flanges, or deactivated automatic valves secured in position, except as provided in Table 3.6.3-1 of Specification 3.6.3."

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Description of the Current Operating License/Technical Specification Requirement (continued)

- e. Technical Specification 3/4.6.3: (applicable sentences or phrases only)

LIMITING CONDITION FOR OPERATION 3.6.3:

"The primary containment isolation valves and the reactor instrumentation line excess flow check valves shown in Table 3.6.3-1 shall be OPERABLE with isolation times less than or equal to those shown in Table 3.6.3-1."

ACTION:

- "a. With one or more of the primary containment isolation valves shown in Table 3.6.3-1 inoperable:"
- "b. With one or more of the reactor instrumentation line excess flow check valves shown in Table 3.6.3-1 inoperable:"

Surveillance Requirements 4.6.3.1 through 4.6.3.4.:

- "4.6.3.1 Each primary containment isolation valve shown in Table 3.6.3-1 shall be demonstrated OPERABLE prior to returning the valve to service after maintenance, repair or replacement work is performed on the valve or its associated actuator, control or power circuit by cycling the valve through at least one complete cycle of full travel and verifying the specified isolation time."
- "4.6.3.2 Each primary containment automatic isolation valve shown in Table 3.6.3-1 shall be demonstrated OPERABLE during COLD SHUTDOWN or REFUELING at least once per 18 months by verifying that on a containment isolation test signal each automatic isolation valve actuates to its isolation position."

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Description of the Current Operating License/Technical Specification Requirement (continued)

- "4.6.3.3 The isolation time of each power operated or automatic valve shown in Table 3.6.3-1 shall be determined to be within its limit when tested pursuant to Specification 4.0.5."
- "4.6.3.4 Each reactor instrumentation line excess flow check valve shown in Table 3.6.3-1 shall be demonstrated OPERABLE at least once per 18 months by verifying that the valve checks flow."
3. The change proposed to Technical Specification 3/4.6.6.1, Drywell and Suppression Chamber Hydrogen Recombiner Systems, affects Surveillance Requirement, 4.6.6.1.b, which is as follows.
- "b. At least once per 6 months by verifying, during a recombinder system functional test:
1. That the heaters are OPERABLE by determining that the current in each phase differs by less than or equal to 5% from the other phases and is within 5% of the value observed in the original acceptance test, corrected for line voltage differences.
 2. That the reaction chamber gas temperature increases to 1200 ± 25 °F within 2 hours."

Bases for the Current Requirements

1. The Bases for the current Unit 1 and 2 Technical Specification 3/4.6.1.2 is as follows:

"The limitations on primary containment leakage rates ensure that the total containment leakage volume will not exceed the value assumed in the accident analyses at the peak accident pressure of 39.6 psig, P_a . As an added conservatism, the measured overall integrated leakage rate is further limited to less than or equal to $0.75 L_a$ during performance of the periodic tests to account for possible degradation of the containment leakage barriers between leakage tests.

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Bases for the Current Requirements (continued)

Operating experience with the main steam line isolation valves has indicated that degradation has occasionally occurred in the leak tightness of the valves; therefore the special requirement for testing these valves.

The surveillance testing for measuring leakage rates is consistent with the requirements of Appendix J to 10 CFR 50 with the exception of exemption(s) granted for main steam isolation valve leak testing and testing the airlocks after each opening."

The Limiting Condition for Operation for Technical Specification 3/4.6.1.2 provides the limits for Primary Containment leakage rates to assure the leakage assumed in the accident analyses, L_a , is not exceeded. Because this testing is conducted with a unit in Cold Shutdown, the Action requirements assure that the associated unit is not started (< 200 °F) unless Primary containment leakage is less than $0.75 L_a$. This provides margin to allow for potential degradation until the next Type A test.

Surveillance Requirements 4.6.1.1.a, 4.6.1.2, 4.6.4.3, and 4.6.6.1.d restate the requirements of Appendix J for the Type A, B, and C tests and/or test frequencies, so that LaSalle is required to conduct Primary Containment Leakage Rate tests by both 10 CFR 50 Appendix J with approved exemptions and Technical Specifications, which includes many of the exemptions currently approved.

2. LaSalle Unit 1 and 2 Technical Specifications related to primary containment isolation valves currently depend on a list of the valves, Table 3.6.3-1, contained in Technical Specifications. The Bases for Technical Specification 3/4.6.3, Primary Containment Isolation Valves, is the following:

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DESCRIPTION OF SAFETY ANALYSIS OF THE PROPOSED CHANGES

Bases for the Current Requirements (continued)

"The OPERABILITY of the primary containment isolation valves ensures that the containment atmosphere will be isolated from the outside environment in the event of a release of radioactive material to the containment atmosphere or pressurization of the containment. Containment isolation within the time limits specified ensures that the release of radioactive material to the environment will be consistent with the assumptions used in the analyses for a LOCA."

Table 3.6.3-1 specifies primary containment isolation valves by component number and group or category of isolation valves, thus providing positive control of the valves which were identified as primary containment isolation valves. Where other specifications, including the definition of PRIMARY CONTAINMENT INTEGRITY, refer to primary containment isolation valves, Table 3.6.3-1 is referenced.

3. Technical Specification 3/4.6.6.1, Drywell and Suppression Chamber Hydrogen Recombiner Systems Surveillance Requirement 4.6.6.1.b, performance of a system functional test for each primary containment hydrogen recombiner, ensures that the recombiners are OPERABLE and can attain and sustain the temperature necessary for hydrogen recombination. In particular, this Surveillance Requirement verifies that the reaction chamber gas temperature increases to 1200°F within 2 hours to check the ability of the recombiner to function properly and verifies heater operability by verifying heater phase currents are within specified limits.

Description of the Need for Amending the Technical Specification

1. Technical Specification changes to the LaSalle Unit 2 Technical Specification Surveillance Requirement 3/4.6.1.2 are needed as companions to the exemption requests addressed in Attachments D and E, because Surveillance Requirement 4.6.1.2 basically duplicates the testing requirements of 10 CFR 50 Appendix J. Without the approval of the requested amendments to Technical Specifications 3/4.6, LaSalle cannot implement the exemptions, upon approval by the Commission.

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DESCRIPTION OF SAFETY ANALYSIS OF THE PROPOSED CHANGES

Description of the Need for Amending the Technical Specification

(continued)

Also, any time a rule change occurs or an exemption is required, a Technical Specification amendment is also required. The Surveillance Requirements under 4.6.1.2 associated with Type B and C tests are also duplicated with previously approved exemptions listed as part of the Surveillance Requirements. In addition, Surveillance Requirements 4.6.1.1.a, 4.6.4.3, and 4.6.6.1.d include 10 CFR 50, Appendix J, leakage testing requirements on specific systems or components.

In order to simplify implementation of rule changes and/or future exemptions, Technical Specification 3/4.6.1.2, Primary Containment Leakage, and Surveillance Requirements 4.6.1.1.a, 4.6.4.3, and 4.6.6.1.d are proposed to be deleted and replaced with a Surveillance Requirement added to Technical Specification 3/4.6.1.1, Primary Containment Integrity, that will require Primary Containment Leakage testing in accordance with 10 CFR 50, Appendix J, and approved exemptions. This will help minimize the need for future changes to the Primary Containment specifications.

2. The changes required to be made to the Primary Containment Integrity and Leakage Technical Specifications involve pages that include reference to the Technical Specification table of Primary Containment Isolation Valves, Table 3.6.3-1. LaSalle has been planning to delete this table in accordance with Reference n and since the table deletion involves the deletion of references to the table, now is an appropriate time.
3. Technical Specification 3/4.6.6.1, Drywell and Suppression Chamber Hydrogen Recombiner Systems, references Technical Specification 3.6.1.2 and 4.6.1.2 in Surveillance Requirement 4.6.6.1.d. Specification 3/4.6.1.2 is proposed to be replaced with a new surveillance requirement under Technical Specification 3/4.6.1.1, Primary Containment Integrity. As a result, Surveillance Requirement 4.6.6.1.d requires a change, which has been proposed above to be deleted with replacement by proposed Surveillance Requirement 4.6.1.1.b. Per Reference p, the functional frequency can be changed from once per 6 months to once per 18 months. This surveillance interval extension will save approximately 3 to 4 man-days per unit per fuel cycle. Also, the Residual Heat Removal (RHR) Pump, associated with the hydrogen recombinder being functionally tested, must be

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Description of the Need for Amending the Technical Specification

(continued)

run during the surveillance to provide cooling for the recombiner. Extending the surveillance interval extension thus reduces run time on the associated RHR pump by about 8 to 10 hours per unit per fuel cycle.

Description of the Amended Technical Specification Requirement

1. LaSalle Technical Specification 3/4.6.1.2 is being deleted and replaced with a new Surveillance Requirement under Technical Specification 3/4.6.1.1, Primary Containment Integrity. Also, special leakage rate tests for the Main Steam Isolation Valves and hydrostatically tested ECCS and RCIC valves will be moved to Technical Specification 3/4.6.3, Primary Containment Isolation Valves. The following are the proposed changes needed to implement deletion of specification 3/4.6.1.2.

- a. Changes to Definition 1.31 (in part) are proposed as follows: (New wording is in italics.)

"PRIMARY CONTAINMENT INTEGRITY shall exist when:

- d. The primary containment leakage rates are *maintained* within the limits *per Surveillance Requirement 4.6.1.1.b.*"
 - b. The current primary containment leakage specifications are being replaced with new Surveillance Requirement 4.6.1.1.b, which is proposed as follows:
 - b. *"Perform required visual examinations and leakage rate testing except for primary containment air lock testing and main steam lines through the isolation valves, in accordance with and at the frequency" specified by 10 CFR 50, Appendix J, as modified by approved exemptions.*

The overall integrated leakage rate acceptance criterion is $\leq 1.0 L_a$. The Type B and C combined leakage rate acceptance criterion is $\leq 0.60 L_a$. However, during the first unit startup

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Description of the Amended Technical Specification Requirement

(continued)

following testing performed in accordance with 10 CFR 50, Appendix J, as modified by approved exemptions, the leakage rate acceptance criteria are $< 0.60 L_a$ for the combined Type B and Type C tests, and $< 0.75 L_a$ for the Type A test."

Footnote # is added to assure that the frequency requirements specified by 10 CFR 50, Appendix J, are met and is consistent with current Surveillance Requirement 4.6.1.2.i.

" # The provisions of Specification 4.0.2 are not applicable to the frequencies specified by 10 CFR 50, Appendix J."

- c. Surveillance Requirement 4.6.2.1.d is proposed as follows to delete criteria that was only applicable during the first few cycles for each LaSalle unit. The deleted material includes a reference to 4.6.1.2.a and the proposed changes are in italics:

"4.6.2.1.d By conducting drywell-to-suppression chamber bypass leak tests *at least once per 18 months at an initial differential pressure of 1.5 psi and verifying that the A/\sqrt{k} calculated from the measured leakage is within the specified limit.*

If any 1.5 psi leak test results in a calculated $A/\sqrt{k} > 20\%$ of the specified limit, then the test schedule for subsequent tests shall be reviewed by the Commission.

If two consecutive 1.5 psi leak tests result in a calculated A/\sqrt{k} greater than the specified limit, then:

1. A 1.5 psi leak test shall be performed at least once per 9 months until two consecutive 1.5 psi leak tests result in the calculated A/\sqrt{k} within the specified limits, and

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Description of the Amended Technical Specification Requirement
(continued)

2. A 5 psi leak test, performed with the second consecutive successful 1.5 psi leak test, results in a calculated A/\sqrt{k} within the specified limit, after which the above schedule of *once per 18 months* for only 1.5 psi leak tests may be resumed.

If any required 5 psi leak test results in a calculated A/\sqrt{k} greater than the specified limit, then the test schedule for subsequent tests shall be reviewed by the Commission.

If two consecutive 5 psi leak tests result in a calculated A/\sqrt{k} greater than the specified limit, then a 5 psi leak test shall be performed at least once per 9 months until two consecutive 5 psi leak tests result in a calculated A/\sqrt{k} within the specified limit, after which the above schedule of *once per 18 months* for only 1.5 psi leak tests may be resumed."

- d. The new Surveillance Requirement 4.6.3.6 and associated footnote * are proposed as follows to retain the special leakage rate tests for main steam lines through the isolation valves and through primary containment isolation valves in hydrostatically tested lines that penetrate the primary containment: (New wording is in italics.)

"4.6.3.6 *At least once per 18 months:*

- a. *Verify leakage rate for all four main steam lines through the isolation valves is ≤ 100 scfh when tested at ≥ 25.0 psig.**
- b. *Verify combined leakage rate of ≤ 1 gpm times the total number of primary containment isolation valves through hydrostatically tested lines that*

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Description of the Amended Technical Specification Requirement

(continued)

*penetrate the primary containment is not exceeded when these isolation valves are tested at $1.1 P_w \geq 43.6$ psig.**

** Results shall be excluded from the combined leakage for all penetrations and seals subject to Type B and C tests."*

- e. To support and provide clear application and understanding of the proposed Surveillance Requirement 4.6.1.1.b, a definition of L_a is proposed to be added to the Definitions, section 1.0, of Technical Specifications as follows:

" L_a

1.20 *The maximum allowable primary containment leakage rate, L_w , shall be 0.635 % of primary containment air weight per day at the calculated peak containment pressure ($P_a = 39.6$ psig)."*

The remaining definitions are renumbered.

2. Table 3.6.3-1 is being deleted from Technical Specifications and included in the UFSAR as part of section 6.2. Table 3.6.3-1 where referenced is being replaced with descriptions which will include all of the applicable primary containment isolation valves.
- a. Changes to definition 1.31 (in part) are proposed as follows: (New wording is in italics.)

"PRIMARY CONTAINMENT INTEGRITY shall exist when:

- a. All primary containment penetrations required to be closed during accident conditions are either:
1. Capable of being closed by an OPERABLE primary containment automatic isolation system, or

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2. Closed by at least one manual valve, blind flange, or deactivated automatic valve secured in its closed position, except *for valves that are open under administrative control as permitted by Specification 3.6.3.*"
- b. Technical Specification Table 3.3.2-1, Isolation Actuation Instrumentation, Table Notation (a) and the associated footnote are deleted.
- c. Technical Specification Table 3.3.2-3, Isolation System Instrumentation Response Time, footnote #: (New wording is in italics.)

"# Isolation system instrumentation response time specified for the Trip Function actuating *the MSIVs* shall be added to *MSIV* isolation time to obtain ISOLATION SYSTEM RESPONSE TIME for each valve."
- d. Current Surveillance Requirement 4.6.1.1.b is proposed to be renumbered as 4.6.1.1.a and is as follows: (New wording is in italics.)

"a. At least once per 31 days by verifying that all primary containment penetrations** not capable of being closed by OPERABLE containment automatic isolation valves and required to be closed during accident conditions are closed by valves, blind flanges, or deactivated automatic valves secured in position, except *for valves that are open under administrative control as permitted by Specification 3.6.3.*"
- e. The following shows the proposed wording for applicable portions of Technical Specification 3/4.6.3: (New wording is in italics. Deleted text is indicated by () where no replacement text is provided.)

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a. Bases for deletion and relocation:

10 CFR 50.36(c) requires that Technical Specifications include items in five specific categories including safety limits; limiting safety system settings; limiting control settings; limiting conditions for operation; surveillance requirements; design features; and administrative controls. However, the rule does not specify the particular requirements to be included in a plant's Technical Specifications. The NRC has developed guidance criteria, as described in the "Final Policy Statement on Technical Specifications Improvements for Nuclear Power Reactors," published in Federal Register 58 FR 39132 (dated July 22, 1993), which can be used to determine which of the design conditions and associated surveillance provisions need to be located in the Technical Specifications.

The policy statement requires that Technical Specifications must include those conditions or limitations on reactor operation which are "necessary to obviate the possibility of an abnormal situation or event giving rise to an immediate threat to the public health and safety." The guidance criteria are summarized as follows:

- 1) Detection of abnormal degradation of the reactor coolant pressure boundary;
- 2) Conditions for bounding design basis accident and transient analyses;
- 3) Primary success paths to prevent or mitigate design basis accidents and transients; and
- 4) Functions determined to be important to risk or operating experience.

The policy statement recognized that items which are relocated from the Technical Specifications to licensee-controlled documents such as the updated FSAR (UFSAR for LaSalle Units 1 and 2) would be controlled in accordance with the requirements of 10 CFR 50.59,

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"Changes tests, and experiments." 10 CFR 50.59 provides criteria to determine when planned facility or operating changes require prior NRC approval for any unreviewed safety questions. Also, NRC inspection and enforcement of licensees enable the NRC to monitor facility changes and licensee adherence to UFSAR commitments and to take any remedial action that may be appropriate.

Technical Specification 3/4.6.1.1, Primary Containment Integrity, by definition 1.31, requires primary containment leakage rates to be within the limits of current specification 3.6.1.2. Thus, if leakage rates are not within limits, then Primary Containment Integrity is not maintained and the actions required by specification 3.6.1.1 must be taken. This connection to primary containment operability is maintained and even clarified by the proposed Surveillance Requirement 4.6.1.1.b, which requires conducting leakage testing in accordance with Appendix J and approved exemptions. Also, the acceptance criteria is maintained by the proposed specifications and definition of L_a . The 10 CFR 50.59 change process and the 10 CFR 50.12 exemption process assure proper control of changes to the primary containment leakage testing as described in the LaSalle UFSAR.

- b. Bases for the Proposed Technical Specifications for Primary Containment Leakage:

The deleted specifications are replaced by proposed Surveillance Requirements 4.6.1.1.b and 4.6.3.6, with any approved exemptions to Appendix J listed in the UFSAR that are currently included in LaSalle Unit 1 and 2 Technical Specifications. Compliance with the requirements of 10 CFR 50, Appendix J, are still assured by the definition of L_a and the new Surveillance Requirements 4.6.1.1.b and 4.6.3.6. The UFSAR will include specifics concerning LaSalle's compliance with the requirements of 10 CFR 50, Appendix J, and the exemptions that have been approved by the NRC.

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This change is consistent with both NUREG 1433, Revision 0, and changes that have been accepted by the NRC for inclusion in NUREG 1433, Revision 1, but without relaxation of the current leakage acceptance criteria in LaSalle Unit 1 and 2 Technical Specifications. The NRC Policy Statement guidance criteria is satisfied concerning the removal of these specifications. The primary containment leakage rates are used as initial conditions in the Design Basis Accident (DBA) radiological evaluations, according to Regulatory Guide 1.3.

However, since leak rates cannot be monitored and controlled during power operation, they are not considered process variables and therefore are not suitable for a limiting condition for operation. Thus, retention of the following in LaSalle Technical Specifications, with respect to primary containment leakage testing, satisfies the requirement to assure that the initial conditions concerning the DBA radiological evaluations are maintained:

- 1) A Surveillance Requirement in specification 3.6.1.1,
- 2) Adding a definition of L_a to section 1.0 of Technical Specifications, and
- 3) The change to the definition of Primary Containment Integrity concerning primary containment leakage,
- 4) Reference to 10 CFR 50, Appendix J, and approved exemptions which specify the test methods and frequencies for primary containment leakage testing requirements.
- 5) Retention of the special leakage testing requirements for main steam lines through the isolation valves and the testing of hydrostatically tested lines as proposed Surveillance Requirement 4.6.3.6 assures compliance with an approved exemption for main steam lines through the isolation valves and 10 CFR 50, Appendix J, for hydrostatically tested lines.

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The acceptance criteria for overall integrated leakage rate testing is L_a or $0.75 L_a$ depending on whether a Type A test is being performed in a given refueling outage or the unit is between scheduled Type A tests. This is evident by the following:

- 1) The current Limiting Condition for Operation 3.6.1.2.a. for overall integrated leakage rate, which requires primary containment leakage rates to be less than or equal to L_a , 0.635 percent by weight of the containment air per 24 hours at P_a , 39.6 psig for the overall integrated leakage rate.
- 2) The Action statements and Type A test Surveillance Requirements require overall integrated leakage to be less than or equal to $0.75 L_a$ when conducting a Type A test.

The current Limiting Condition for Operation 3.6.1.2.b for Type B and C testing is as follows:

- "b. A combined leakage rate of less than or equal to $0.60 L_a$ for all penetrations and all valves listed in Table 3.6.3-1, except for main steam isolation valves and valves which are hydrostatically leak tested per Table 3.6.3-1, subject to Type B and C tests when pressurized to P_a , 39.6 psig."

The action statements for combined Type B and C leakage rate also require less than or equal to $0.60 L_a$ when Type B and C leakage rate testing is conducted.

The proposed specification retains these limits for operational leakage limits for leakage rates by proposed Surveillance Requirement 4.6.1.1.b, because of the following acceptance criteria that is part of proposed 4.6.1.1.b:

"The overall integrated leakage rate acceptance criterion is $\leq 1.0 L_a$. The Type B and C combined leakage rate acceptance criterion is $\leq 0.60 L_a$. However, during the first unit startup following testing

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performed in accordance with 10 CFR 50, Appendix J, as modified by approved exemptions, the leakage rate acceptance criteria are $< 0.60 L_a$ for the Type B and Type C tests, and $< 0.75 L_a$ for the Type A test."

Action statements currently require the leakage acceptance criteria of $0.75 L_a$ for Type A tests and $0.60 L_a$ for combined Type B and C tests, except for main steam lines through the isolation valves and valves which are hydrostatically tested, to be met or restored prior to exceeding 200 °F. Therefore the proposed acceptance criteria is consistent with the current specification 3/4.6.1.1 Limiting Condition for Operation and associated Action statements and Surveillance Requirements.

Therefore, the threshold for an inoperable containment during power operation (after satisfactorily passing the test acceptance criteria) is $1.0 L_a$, not $0.75 L_a$. The primary containment is fully capable of performing its intended safety function at leakage rates up to L_a , and removing the definition of L_a from Limiting Conditions for Operation, Actions, and Surveillance Requirements for primary containment, will facilitate understanding and proper application. Further clarification is proposed by inclusion of specific acceptance criteria for proposed Surveillance Requirement 4.6.1.1.b.

- c. Bases for changes in location of special Appendix J test requirements and exemptions to 10 CFR 50, Appendix J:

- 1) The Type A test interval is defined as 40 ± 10 months in current Surveillance Requirement 4.6.1.2.a, which is consistent with the requirement of Appendix J section III.D.1:

"... a set of three Type A tests shall be performed, at approximately equal intervals during each 10-year service period."

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The Type A test interval will continue to be 40 ± 10 months, to assure compliance with the Appendix J requirement for normal periodic test frequency. This interpretation of the frequency will be stated in the LaSalle Units 1 and 2 UFSAR.

The remainder of current Surveillance Requirement 4.6.1.2.a is consistent with Appendix J, section III.A.5 for peak pressure tests.

Therefore, since proposed Surveillance Requirement 4.6.1.1.b requires testing and test frequency in accordance with 10 CFR 50, Appendix J, and approved exemptions, the requirements are maintained.

- 2) Current Surveillance Requirement 4.6.1.2.b, concerning special requirements to be met when Type A tests exceed $0.75 L_a$, is consistent with Appendix J section III.A.6(a) and III.A.6(b). Therefore, since proposed Surveillance Requirement 4.6.1.1.b requires testing and test frequency in accordance with 10 CFR 50, Appendix J, and approved exemptions, the requirements are maintained.
- 3) Current Surveillance Requirement 4.6.1.2.c concerning verification of the accuracy of each Type A test is consistent with Appendix J section III.A.3.(b). Therefore, since proposed Surveillance Requirement 4.6.1.1.b requires testing and test frequency in accordance with 10 CFR 50, Appendix J, and approved exemptions, the requirements are maintained.
- 4) Current Surveillance Requirement 4.6.1.2.d requires Type B and C tests and test frequencies with exceptions for specifically listed tests. The tests and test frequency are in accordance with Appendix J. Some exceptions or exemptions are addressed by items 5) through 8). Thus, Surveillance Requirement 4.6.1.2.d is being deleted and proposed Surveillance Requirement 4.6.1.1.b assures Type B and

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C tests will be performed in accordance with and at the frequency required by Appendix J and approved exemptions.

- 5) Current Surveillance Requirement 4.6.1.2.e specifies that "Air locks shall be tested and demonstrated OPERABLE per Surveillance Requirement 4.6.1.3." The exception for the testing of Air Locks is specified in proposed Surveillance Requirement 4.6.1.1.b as an exception to Appendix J. The specific requirements for the primary containment air lock for each unit are currently and will remain as specification 3/4.6.1.3, Primary Containment Air Locks. Also, the Definition of Primary Containment Integrity refers to specification 3.6.1.3. Therefore, air lock testing and operability requirements are retained in Technical Specifications and are not affected by this proposed amendment.
- 6) Current Surveillance Requirement 4.6.1.2.f requires special frequency requirements for leak rate testing for main steam lines through the isolation valves. The Limiting Condition for Operation (LCO), 3.6.1.2.c, provides special acceptance criteria of "less than or equal to 100 scf per hour for all four main steam lines through the isolation valves when tested at 25.0 psig." The LCO is modified by footnote *, which states this is an exemption to Appendix "J" of 10 CFR 50. This testing requirement, frequency, and acceptance criteria are relocated to specification 3/4.6.3, Primary Containment Isolation Valves, as proposed Surveillance Requirement 4.6.3.6.a. This assures that the exemption concerning the main steam lines through the isolation valves is clearly separated from Type B and C combined leakage rate. The Main steam line leakage through the isolation valves is excluded from the Type B and C combined leakage rate, because the main steam line leakage through the isolation valves is separately accounted for in the LOCA accident analysis for the dose consequences. This was approved by the NRC in NUREG 0519,

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including Supplement 6 to NUREG 0519. To maintain this exemption, proposed Surveillance Requirement 4.6.3.6.a is modified by a footnote.

Therefore, the approved exemption regarding the leakage test requirements for main steam lines through the isolation valves is maintained as worded in proposed Surveillance Requirement 4.6.3.6.a. Maintaining this exemption in Technical Specifications is appropriate to assure proper interpretation of OPERABILITY and leakage test requirements for main steam lines through the isolation valves. The results of the leakage tests are not included in combined Type B and C leakage rates per the approved exemption. Therefore, the proposed Surveillance Requirement 4.6.3.6.a is located in specification 3/4.6.3 to make clear the special leakage requirements and acceptance criteria for main steam lines through the isolation valves.

- 7) Current Surveillance Requirement 4.6.1.2.g concerning special testing requirements to be met for leakage from isolation valves that are sealed with fluid from a seal system, is consistent with Appendix J section III.C. Therefore, since proposed Surveillance Requirement 4.6.1.1.b requires testing and test frequency in accordance with 10 CFR 50, Appendix J, and approved exemptions, the requirements are maintained without the specific requirement in Technical Specifications.
- 8) Current Surveillance Requirement 4.6.1.2.h requires special frequency requirements for leak rate testing for ECCS and RCIC containment isolation valves in hydrostatically tested lines which penetrate the primary containment. The Limiting Condition for Operation (LCO), 3.6.1.2.d, provides special acceptance criteria as follows:

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"A combined leakage rate of less than or equal to 1 gpm times the total number of ECCS and RCIC containment isolation valves in hydrostatically tested lines which penetrate the primary containment, when tested at 1.10 P_a, 43.6 psig."

This testing requirement, frequency, and acceptance criteria are relocated to specification 3/4.6.3, Primary Containment Isolation Valves as proposed Surveillance Requirement 4.6.3.6.b. This assures that the special surveillance frequency and acceptance criteria concerning ECCS and RCIC containment isolation valves in hydrostatically tested lines remains clearly separated from Type B and C combined leakage rate.

UFSAR Section 6.2 and NUREG 0519, section 6.2.6.2, states that the leakage from these valves will be excluded when determining the combined leakage rate for all penetrations and valves as specified in Paragraph III.C.3 of Appendix J. This was approved by the NRC in NUREG 0519, section 6.2.6.2. To maintain this exemption, proposed Surveillance Requirement 4.6.3.6.b is modified by a footnote.

Therefore, the approved exemption regarding the leakage test requirements for ECCS and RCIC containment isolation valves in hydrostatically tested lines is maintained as worded in proposed Surveillance Requirement 4.6.3.6.a. Maintaining this exemption in Technical Specifications is appropriate to assure proper interpretation of OPERABILITY and leakage test requirements for ECCS and RCIC containment isolation valves in hydrostatically tested lines. The results of the leakage tests are not included in combined Type B and C leakage rates per the approved exemption. Therefore the proposed Surveillance Requirement 4.6.3.6.b is located in specification 3/4.6.3 to make clear the special leakage requirements and acceptance criteria for main steam lines through the isolation valves.

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- 9) Current Surveillance Requirement 4.6.1.2.i concerns the surveillance frequency for 24 month or 40 ± 10 month frequencies to make extensions of these surveillance intervals per specification 4.0.2 "N/A", Not Applicable. These frequencies pertain to the Type B or C test frequency and the Type A test frequency of Appendix J, section III.D. Appendix J, section III.D states that 2 years (24 months) is the maximum interval for Type B and C testing. Type A test frequency is given as "a set of three Type A tests shall be performed, at approximately equal intervals during each 10-year service period." The criterion for extension of the interval is maintained by the 40 ± 10 month limit.

This requirement is being retained in order to maintain the frequency requirements of 10 CFR 50, Appendix J. Proposed Surveillance Requirement 4.6.1.1.b is modified by footnote # to make the provisions of specification 4.0.2 not applicable to the frequencies of Appendix J.

- 10) Current Surveillance Requirement 4.6.4.3 is being deleted. The surveillance lists the requirement to perform a Type B test at 39.6 psig, P_a , on vacuum breaker header flanges that have been broken, in accordance with 4.6.1.2.d. These flanges are within the primary containment penetration boundary for vacuum breaker penetrations and therefore 10 CFR 50, Appendix J, section III.D.2, requires the following:

"If opened following a Type A or B test, containment penetrations subject to Type B testing shall be Type B tested prior to returning the reactor to an operating mode requiring containment integrity."

Proposed Surveillance Requirement 4.6.1.1.b requires performance of leak rate testing in accordance with and at the frequency specified by Appendix J. This assures that vacuum breaker header flanges, as well as other Type B tested penetrations, will be Type B tested

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when required. Therefore, deletion of this surveillance requirement does not change the requirement to Type B test these flanges after being broken.

- 11) Current Surveillance Requirement 4.6.6.1.d is being deleted. The surveillance lists the requirement to perform leak rate testing of the Drywell and Suppression Chamber Hydrogen Recombiner Systems. These systems are an extension of the Primary Containment, because the systems are designed for operation during accidents. As a result, the system leakage must be accounted for in the Type A test total leakage. The leakage testing is allowed to be performed as part of a Type A test or by measuring the leakage rate of the system outside of the containment isolation valves at P_a , 39.6 psig. Proposed Surveillance Requirement 4.6.1.1.b requires performance of leakage rate testing in accordance with and at the frequency specified by Appendix J. The Drywell and Suppression Chamber Hydrogen Recombiner Systems are designed to be part of the primary containment during an accident. Therefore, Appendix J requires this system to either be open (vented) to the primary containment during a Type A test, or accounted for by a separate leakage rate test that is included in the overall integrated leakage rate test. Therefore, deletion of this surveillance requirement does not change the requirement to perform the leakage rate testing required of the Drywell and Suppression Chamber Hydrogen Recombiner Systems.
2. LaSalle Unit 1 and 2 Technical Specification 3/4.6.3, Primary Containment Isolation Valves, includes Table 3.6.3-1, Primary Containment Isolation Valves, which specifically identifies the individual components by their plant identification number. This list of components is referenced in or by several Technical Specification Limiting Conditions for Operation and Surveillance Requirements, including the definition of Primary Containment Integrity.

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Table 3.6.3-1 is being deleted in accordance with Generic Letter 91-08, Removal of Component Lists from Technical Specifications (Reference n). The changes proposed to specification 3/4.6.3, definitions, and other specifications referencing Table 3.6.3-1 are changed or verified to be descriptive of the components to which the definition or specification applies. The wording changes are consistent with the changes recommended by Generic Letter 91-08, Enclosure 2, "Existing STS Requirements and Changes to Allow the Removal of Component Lists.

The following addresses Generic Letter 91-08 recommendations in Enclosure 1, "Removal of Component Lists from Technical Specifications," concerning notes in Table 3.6.3-1:

- a. LaSalle Technical Specification 3/4.6.3 and associated Table 3.6.3-1 do not have a reference to the applicability of specification 3.0.4, because LaSalle Unit 1 and 2 Technical Specifications have been amended to incorporate the changes to 3.0.4 per Generic Letter 87-09. Therefore, no changes to this specification concerning 3.0.4 applicability are required.
- b. Table 3.6.3-1 note * pertains to items a.1, Main Steam Isolation Valves (MSIVs) to indicate that these valves also have a lower limit of 3 seconds on isolation time. Specification 3/4.4.7, Main Steam Isolation Valves, includes the closure time limits for MSIVs as a range of ≥ 3 seconds and ≤ 5 seconds. Therefore, note * duplicates the requirements of an existing specification and can be deleted with the deletion of Table 3.6.3-1.
- c. Note (a) applies to the "Valve Group" column in Table 3.6.3-1, which refers to the "Valve Groups Operated by Signal" column in Table 3.3.2-1, Isolation Actuation Instrumentation. The information concerning valves in valve groups and the isolation signals that operate each valve group is in LaSalle UFSAR Section 6.2. Therefore, the note (a) of Table 3.6.3-1 is not required to be

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retained. Likewise, note (a) of Table 3.3.2-1 is being deleted, since Table 3.6.3-1 is being removed from Technical Specifications.

- d. Note (b), "Not included in total sum of Type B and C tests," has been retained in Technical Specifications. This note pertains to the approved exemption regarding the leakage test requirements for main steam lines through the isolation valves. This exemption with a footnote similar to note (b) is proposed Surveillance Requirement 4.6.3.6.a.
- e. Note (c), "May be opened on an intermittent basis under administrative control," is being retained in specification 3/4.6.3 as footnote **. This footnote will be modified to include the wording for this note proposed by the Generic Letter as:

"Locked or sealed closed valves may be opened on an intermittent basis under administrative control."

The note is proposed by LaSalle to be added to specification 3/4.6.3 and will appear as follows:

"*** Locked or sealed closed valves may be opened on an intermittent basis under administrative control."

Making this note apply to all "locked or sealed closed valves" that are locked or sealed closed is consistent with the design requirements of General Design Criteria (GDC) 55, 56, and 57 of Appendix A to 10 CFR 50. The design of these valves includes positive control features to ensure that they are maintained closed. Without this footnote, the opening of these locked or sealed closed valves would be contrary to the operability requirements for these valves. Remote manual valves associated with closed systems are an acceptable alternative to a locked or sealed closed valve for closed systems as stated in GDC 57 in Appendix A to 10 CFR 50, and will thus be covered under this footnote.

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In conjunction with this change, per Generic Letter 91-08, the definition of Primary Containment Integrity and the Surveillance Requirements for demonstrating Primary Containment Integrity in specification 4.6.1.1.b are being revised to remove reference to Table 3.6.3-1. These sections of the LaSalle Technical Specifications are proposed to be revised to state "..., except for valves that are open under administrative control as permitted by Specification 3.6.3."

The considerations that constitute an acceptable administrative control for opening locked or sealed closed containment isolation valves were recommended by Generic Letter 91-08 to be stated in the Bases section for specification 3.6.3. This consideration is being added to the Bases for this specification as follows:

- "The opening of locked or sealed closed containment isolation valves on an intermittent basis under administrative control includes the following considerations: (1) stationing an operator, who is in constant communication with the control room, at the valve controls, (2) instructing this operator to close these valves in an accident situation, and (3) assuring that environmental conditions will not preclude access to close the valves and that this action will prevent the release of radioactivity outside the primary containment."
- f. Note (d), "Not closed by SLCS actuation," is being deleted, because the information is currently included as footnote (f) to Table 3.3.2-1, Isolation Actuation Instrumentation.
 - g. Notes (e) and (f) pertain to the steam supply line to both the Reactor Core Isolation Cooling (RCIC) system and Steam Condensing Mode of the Residual Heat Removal (RHR) system. Outboard of the Primary Containment, the steam supply line

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splits to provide steam to each of the two systems. Downstream of the split, each line has an isolation valve. The isolation actuation signals for each of these valves differ based on leak detection type isolations, or system specific isolations. The information concerning which isolation actuation signal(s) apply to which automatic isolation valve are contained in UFSAR Section 6.2 as stated in c. above concerning Note (a). Therefore, Notes (e) and (f) are being deleted from Technical Specifications.

- h. Note (g) pertains to those isolation valves that are not subject to Type C testing requirements of 10 CFR 50, Appendix J. This note does not alter Appendix J, but instead clarifies where either the NRC has granted exemptions to Type C leak testing or where Appendix J does not require this testing. UFSAR Section 6.2 includes applicability of Appendix J requirements for each primary containment penetration. This Appendix J leakage rate testing applicability was addressed in the LaSalle SER, NUREG 0519, section 6.2.6.5 (Reference s). Also, proposed surveillance requirement 4.6.1.1.b states that containment leakage rate testing is done in accordance with Appendix J and approved exemptions. No further clarification is needed in LaSalle Technical Specifications. Therefore, this note is not required to address this clarification.
- i. Note (h), "Opens on an isolation signal. Valves will be open during Type A test. No Type C test required," pertains to the Post LOCA Containment Monitoring isolation valves. This information is in UFSAR Table 6.2-21 as the following notes:

Note 28, discusses the alternate basis for meeting GDC 56.

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Note 37, discusses the basis for opening on an isolation actuation signal.

Note 40, discusses the basis for the position during a Type A leakage test and as a result that no Type C leakage test is required.

These valves are required to be opened for weekly and monthly Technical Specification surveillances to determine containment oxygen concentration and Post LOCA Containment Monitoring instrumentation Channel Check, respectively. Also, the valves are open at other times, such as the following:

- 1) During and/or after primary containment inerting or de-inerting,
- 2) During and/or after primary containment pressure control adjustments,
- 3) Valve testing,
- 4) Oxygen or hydrogen monitoring instrumentation surveillances, which require system flow or verification tests, and
- 5) Any time oxygen monitoring is determined to be needed to confirm primary containment oxygen concentration is less than 4% in Operational Condition 1 at greater than 15% Thermal Power.

Note 37 will be revised at the next scheduled update to the UFSAR, to reflect the opening of these remote manual valves for surveillance testing or for monitoring oxygen concentration. Primary Containment operability is not affected, by the opening of these valves during operation for surveillance testing or maintenance, because the valves are open during the Type

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A test and Type C testing is Not Applicable. Based on the above, this note is being deleted from Technical Specifications.

- j. Note (i), "also closed by drywell pressure-high signal," pertains to RHR Shutdown Cooling Mode isolation valves. The information concerning which isolation actuation signal(s) apply to which automatic isolation valve are contained in UFSAR Section 6.2 as stated in c. above concerning Note (a). Therefore, Note (i) is being deleted from Technical Specifications.
- k. Note (j), "hydraulic leak test at 43.6 psig," pertains to primary containment isolation valve leakage through hydrostatically tested lines that penetrate the primary containment. This note identifies the valves to be tested in accordance with current Surveillance Requirement 4.6.1.2.h regarding ECCS and RCIC containment isolation valves that are in hydrostatically tested lines, which penetrate the primary containment. Note (j) also applies to the Reactor Recirculation pump seal injection supply penetration containment isolation valves, Table 3.6.3-1, items d.9. As a result, the proposed relocated Surveillance Requirement, 4.6.3.6.b, is being reworded to refer to "primary containment isolation valves through hydrostatically tested lines that penetrate the primary containment." This generic wording will encompass the applicable ECCS and RCIC valves and the Reactor Recirculation pump seal injection supply penetration containment isolation valves. Therefore, Note (j) is being relocated to UFSAR Section 6.2 to identify the applicability to specific containment isolation valves and a proposed Technical Specification Surveillance Requirement 4.6.3.6.b. is being retained in Technical Specifications to address the test frequency and acceptance criteria.

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- l. Note (k), "Not subject to Type C leakage test - leakage rate tested per Specification 4.4.3.2.2," pertains to High/Low pressure interface valves for reactor coolant pressure isolation valve leakage. This note does not alter Appendix J, but instead clarifies where either the NRC has granted exemptions to Type C leak testing or where Appendix J does not require this testing. Therefore, this note is not required to address this clarification. UFSAR Section 6.2 includes applicability of Appendix J requirements for each primary containment penetration. Also, proposed surveillance requirement 4.6.1.1.b states that containment leakage rate testing is done in accordance with Appendix J and approved exemptions. No further clarification is needed in LaSalle Technical Specifications. Specification 3/4.4.3.2 identifies the specific valves in Table 3.4.3.2-1, Reactor Coolant System Pressure Isolation Valves, and adequately addresses the requirements for leakage testing of High/Low pressure interface valves for reactor coolant pressure isolation valve leakage without this note.
- m. Note (l) is as follows:
 - (l) These penetrations are provided with removable spools outboard of the outboard isolation valve. During operation, these lines will be blind flanged using a double O-ring and a type B leak test. In addition, the packing of these isolation valves will be soap-bubble tested to ensure insignificant or no leakage at the containment test pressure each refueling outage.

This note applies to four manual isolation valves, Table 3.6.3-1 items b.5 through b.8. This information is in UFSAR Table 6.2-21 as Note 43. Note (l) does not alter Appendix J, but instead

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clarifies where either the NRC has granted exemptions to Type C leak testing or where Appendix J does not require this testing. Therefore, Note (l) is not required to address this clarification and is being relocated with Table 3.6.3-1.

- n. Notes (m) and (n) pertain specifically to the RCIC test return line primary containment isolation valves. These special requirements with respect to containment isolation boundary and Appendix J leakage testing requirements are currently in UFSAR Table 6.2-21 as Note 49. Notes (m) and (n) do not alter Appendix J, but instead clarify where either the NRC has granted exemptions to Type C leak testing or where Appendix J does not require this testing. The NRC Safety Evaluation Report for LaSalle Unit 1 license NPF-11 amendment 81 and Unit 2 license NPF-18 amendment 65 approved these special leakage test and containment boundary requirements (Reference v). Therefore, Notes (m) and (n) are not required to address this clarification and are being relocated with Table 3.6.3-1.

The maximum isolation time (seconds) listed for many of the automatic isolation valves listed in Table 3.6.3-1 is listed as 1.0 times the "nominal operating times" calculated using Note 7 of UFSAR Table 6.2-21. However, Note 7 states that "standard operating time" is 110% of the nominal operating time. Therefore, for those valves listed with "maximum isolation time (seconds)" in Technical Specification Table 3.6.3-1, equal to the "nominal operating times" in UFSAR Table 6.2-21, note 7, the "standard operating time" of 110% of the nominal operating time will be used. This is consistent with manufacturer information for the given valve types. The basis for operability of valves with standard operating times rather than specifically required times, such as MSIVs, is the IST program concerning valve stroke times that establishes an acceptance range to monitor valve performance as required by Technical Specification Surveillance Requirement 4.6.3.3.

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3. The surveillance test interval for the hydrogen recombiner functional test is proposed to be changed to once every 18 months from a 6 month surveillance interval per Generic Letter 93-05, section 8.5 of Enclosure 1, (Reference p) and NUREG-1366, section 8.5 (Reference q).

Per section 8.5 of NUREG-1366, this surveillance interval extension is based on a search of Licensing Event Reports (LERs) to assess the reliability of hydrogen recombiners. LaSalle operating experience has shown that these components normally pass the Surveillance when performed at the 6 month Frequency. A review of LaSalle LERs has shown only one LER that involved the operability of the hydrogen recombiner system and that was due to a Part 21 issue regarding circuit breaker environmental qualification. Therefore, the LaSalle Hydrogen Recombiner operability is consistent with or better than that found by the NRC in determining this surveillance interval extension based on all LERs. LaSalle has two hydrogen recombiners subsystems that are shared by Unit 1 and Unit 2. Both hydrogen recombiners subsystems are required to be Operable for either or both units in Operational Conditions 1 and 2.

Generic Letter 93-05 also changes the frequency of "At least once per 18 months" and "At least once per 6 months" to "At least once each REFUELING INTERVAL". This is based on changes recommended in Generic Letter 91-04, "Changes in Technical Specification Surveillance Intervals to Accommodate a 24-Month Fuel Cycle" (Reference r). The Generic Letter 91-04 changes are not being included at this time, because of other Technical Specification changes required to implement Generic Letter 91-04. Therefore, the current practice of specifying "At least once per 18 months" is being retained for surveillances being performed at refueling intervals.

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PROPOSED FACILITY OPERATING LICENSE CHANGES FOR REQUESTED EXEMPTIONS

The proposed change to LaSalle County Station, Unit 1 Facility Operating License NPF-11, section 2.D, to document the exemption described in Attachment E is as follows:

"(e) An exemption from the requirement of paragraph III.D of Appendix J to conduct the third Type A test of each ten-year service period when the plant is shutdown for the 10-year plant inservice inspections. Exemption (e) is described in the safety evaluation accompanying Amendment No. ____ to this license."

Section 2.D of license NPF-11 has also been reformatted to more clearly distinguish between exemptions and a marked up copy is provided in Attachment B.

The proposed change to LaSalle County Station, Unit 2 Facility Operating License NPF-18, section 2.D, to document the exemptions described in Attachments D and E is as follows:

"(c) An exemption from the requirement of paragraph III.D of Appendix J to conduct the third Type A test of each ten-year service period when the plant is shutdown for the 10-year plant inservice inspections. (d) A one-time exemption from the requirement of paragraph III.A.6(b) of Appendix J to resume a Type A test schedule of three times in ten years. Exemptions (c) and (d) are described in the safety evaluation accompanying Amendment No. ____ to this license.

Section 2.D of license NPF-18 has also been reformatted to more clearly distinguish between exemptions and a marked up copy is provided in Attachment B.

Schedule

This Technical Specification amendment request and the exemptions to 10 CFR 50, Appendix J, are requested to be approved by March 15, 1995 in order to remove the currently scheduled Type A test and associated activities from the LaSalle Unit 2 sixth refueling outage scope.

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References

- a. IE Information Notice 85-71, dated August 22, 1985.
- b. Licensee Event Report, LER 50-374-87-002, Revision 1, Dated October 29, 1987.
- c. Licensee Event Report, LER 50-374-90-004, Revision 1, Dated September 25, 1990.
- d. Not used.
- e. Letter from D. L. Mineck to Dr. T. E. Murley, dated April 2, 1990; Subject: Duane Arnold Energy Center - Request for Limited Exemption from 10 CFR 50, Appendix J Retest Requirements.
- f. Letter from B. Holian to G. B. Slade, dated February 11, 1991; Subject: Amendment No. 135 to Provisional Operating License No. DPR-20 (TAC Nos. 77564, 77752, and 77850).
- g. Not used.
- h. LTS-300-5, Local Leak Rate Test, 0.6 L_a Accountability Program.
- i. LTS-100-22, Drywell Pneumatic System Discharge Isolation Valves Local Leak Rate Tests 1(2)IN017, 1(2)IN031, and 1(2)IN018.
- j. Letter from P. L. Piet to USNRC, dated October 11, 1991; Subject: LaSalle County Station Unit 2 Request for One-time Exemption from Appendix J, to 10 CFR Part 50 Accelerated Type A Testing Requirements and Request for Amendment to Facility Operating Licenses NPF-11 and NPF-18, Appendix A, Technical Specification Surveillance Requirement 4.6.1.2.
- k. Deviation Report 1-2-92-0007 dated February 18, 1992, and Supplement 1 dated September 11, 1992.
- l. LTS-300-4, Primary Containment Integrated Leak Rate Test.
- m. Maintenance Department Memorandum No. 27 of May 1, 1992, Maintenance Problem Analysis Data Sheet ("PADS").

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- n. Generic Letter 91-08, Removal of Component Lists from Technical Specifications, dated May 6, 1991.
- p. Generic Letter 93-05, Line-Item Technical Specifications Improvements to Reduce Surveillance Requirements for Testing During Power Operation, dated September 27, 1993, Section 8.5 Hydrogen Recombiner.
- q. NUREG-1366, Improvements to Technical Specifications Surveillance Requirements, published December 1992, Section 8.5 Hydrogen Recombiner (PWR, BWR).
- r. Generic Letter 91-04, Changes in Technical Specification Surveillance Intervals to Accommodate a 24-Month Fuel Cycle, dated April 2, 1991.
- s. NUREG-0519, Safety Evaluation Report related to the operation of LaSalle County Station Units 1 and 2, Docket Nos. 50-373 and 50-374, Commonwealth Edison Company; by U.S. Nuclear Reactor Regulation, dated March 1981.
- t. Letter dated July 2, 1992 from G. J. Diederich to U.S. NRC; transmitting the report, Reactor Containment Building Integrated Leak Rate Test, LaSalle County Nuclear Power Station, Docket No. 50-374, NPF-18, Unit 2, for the March 27, 1992 (L2R04) Type A test.
- u. Letter dated March 17, 1994 from D. J. Ray to U.S. NRC; transmitting the report, Reactor Containment Building Integrated Leak Rate Test, LaSalle County Nuclear Power Station, Docket No. 50-374, NPF-18, Unit 2, for the December 8, 1993 (L2R05) Type A test.
- v. Letter dated November 27, 1991 from B. L. Siegel, Office of NRR, to T. J. Kovach, issuance of amendments (TAC NOS. 77812 and 77813) to Facility Operating License No. NPF-11, Amendment No. 81 and Facility Operating License No. NPF-18, Amendment No. 65 for LaSalle County Station, Units 1 and 2, respectively.