



Commonwealth Edison
1400 Opus Place
Downers Grove, Illinois 60515

February 1, 1995

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

Subject: LaSalle County Nuclear Power Station Unit 1
Inservice Inspection Program
Submittal of Relief Request RI-32
NRC Docket Nos. 50-373

LaSalle County Station performs inservice inspections in accordance with ASME Section XI, 1980 Edition, Winter 1980 addenda. ASME Section XI, IWA-2420 and IWA-2400 provide the requirements for establishing Inservice Inspection Intervals. Relief Request RI-32 requests Relief pursuant to 10 CFR 50.55a(a)(3)(ii) that the Initial Inservice Inspection Interval for Unit 1 be extended approximately four months through the end of the LaSalle Unit 1 seventh refueling outage, currently scheduled to begin January 28, 1996.

ComEd requests approval of this relief request prior to November 23, 1995, which is when the Initial Inservice Inspection Interval for Unit 1 currently ends.

Please contact this office should further information be required.

Very truly yours,

Gary G. Benes
Nuclear Licensing Administrator

Attachment

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

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**RELIEF REQUEST NO. RI-32
FOR LASALLE COUNTY STATION UNIT 1**

COMPONENT IDENTIFICATION

Code Classes: 1, 2, & 3

References: SubArticle IWA-2400
SubSubArticle IWA-2420

Examination Categories: All Section XI Code Categories

Item Numbers: All Section XI Items

Description: Relief from ASME Section XI Requirements pursuant to 10 CFR 50.55a(a)(3)(ii) for establishing the Initial Inservice Inspection Interval for LaSalle County Station Unit 1.

CODE REQUIREMENT

LaSalle Station is committed to the 1980 Edition, Winter 1980 Addendum of ASME Section XI. SubSubArticle IWA-2420 defines the length of the Initial Inservice Inspection Interval of Inspection Plan "B" as being equal to ten years following the initial start of the power unit into commercial operation. SubArticle IWA-2400 provides the methodology to be used by Licensees in establishing Inspection Intervals, and in paragraph (c) of that Subarticle allows for each Inspection Interval to be decreased, or extended (but not cumulatively) by as much as one year. Additionally, paragraph (c) allows for the extension of an Inservice Inspection Interval during which a power unit is continuously out of service for six months or more by a time period equal to the outage length.

BASIS FOR RELIEF

LaSalle County Station Unit 1 is currently in its Initial Inservice Inspection Interval, and is utilizing Inspection Plan "B". The commercial service date of LaSalle County Station Unit 1 is January 1, 1984. At the end of the first fuel cycle, LaSalle Unit 1 underwent a continuous refueling outage which lasted 329 days, and extended its Initial Inspection Interval accordingly. In order to complete examinations scheduled for the last refueling outage of the Initial Inspection Interval, LaSalle also determined that it would be necessary to further extend its Initial Inspection Interval by one year until November 23, 1995 to coincide with its seventh refueling outage scheduled for September 20, 1995. However, LaSalle is currently pursuing such regulatory relief as may be necessary in order to defer its Unit 1 seventh refueling outage,

until approximately January 28, 1996 thru March 20, 1996. The deferral of the outage until approximately January 28, 1996 thru March 20, 1996 would result in LaSalle County Station Unit 1 exceeding the amount of time allowed by ASME Section XI for the completion of its Initial Inservice Inspection Interval by approximately four months.

LaSalle believes that in this specific case, imposition of the Code Requirement would result in undue hardship and unusual difficulty in that it would require bringing the unit to the cold shutdown condition for the sole purpose of completing the remaining small number of examinations which could be deferred for a relatively short time frame (approximately four months) if relief from the Code Requirement were granted.

LaSalle further believes that the deferral of these examinations to coincide with the refueling outage does not violate the intent of the ASME Section XI Code, and thus deferred completion of the required examinations would still give adequate assurance that the structural integrity of ASME Code components and their supports is maintained, as well as provide the appropriate level of quality and safety.

PROPOSED ALTERNATE EXAMINATION

LaSalle County Station shall complete the required tests and examinations in accordance with the 1980 Edition, Winter of 1980 Addendum of ASME Section XI using the same methods as would normally have been used.

APPLICABLE TIME PERIOD

Relief is requested pursuant to 10 CFR 50.55a(a)(3)(ii) to extend the Initial Inservice Inspection Interval through the end of the seventh refueling outage at LaSalle County Station Unit 1.