



Commonwealth Edison

One First National Plaza, Chicago, Illinois

Address Reply to: Post Office Box 767

Chicago, Illinois 60690

October 6, 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
Updated Status of 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): Cordell Reed letter to H. R. Denton
dated July 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, as explained in Reference (c), 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.

Reference (c) provided Commonwealth Edison's request for approval to defer the completion of certain 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.

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October 6, 1983

As explained in Reference (c), 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 of remaining tests will allow additional time to ensure a thorough evaluation and review of the test results.

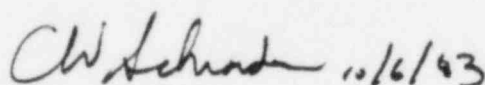
A review of Chapter 14 of the FSAR has revealed that several of the startup test abstracts list, as an Initial Condition, "All construction and preoperational testing completed." Approval by the NRC to defer completion of preoperational tests is understood to include authorization to deviate from this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

The purpose of this letter is to provide you with an update of the status of the systems listed in Reference (c). The attachment to this letter indicates the current status of the preoperational tests for which deferral was requested and further substantiates our expectations that it is anticipated that, in a majority of cases, the physical testing will be completed prior to fuel load.

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

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

Very truly yours,

Handwritten signature of C. W. Schroeder, dated 10/16/83.

C. W. Schroeder
Nuclear Licensing Administrator

CWS/lm

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

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Requested Preoperational Test Program Exceptions

| <u>TEST</u> | <u>TEST SECTIONS</u> | <u>JUSTIFICATION</u> | <u>COMPLETION REQUIRED PRIOR TO</u> | <u>10/04/83 Status</u> |
|---|----------------------|--|--|--|
| PT-CM-201 Containment Monitoring | ALL | No equipment in this test is required operable during cold shutdown or refueling operations. | Initial Criticality | 90% complete |
| PT-CM-202 Post LOCA Containment Monitoring | ALL | No equipment in this test is required operable during cold shutdown or refueling operations. | Initial Criticality | 23% complete |
| PT-IN201 Drywell Pneumatics | ALL | No equipment operated by drywell pneumatics is required operable during cold shutdown or refueling operations. | Initial Criticality | 95% complete |
| PT-LD201 Leakage Detection | ALL | No leakage detection equipment is required operable during cold shutdown or refueling operations. | Initial Criticality | 100% complete test being evaluated by engineering |
| PT-MS201A MSIV Leakage Control System | ALL | The MSIV Leakage Control System is not required operable during cold shutdown or refueling operations. | Initial Criticality | 88% complete |
| PT-MS201B MSIV's and MS Instrumentation | ALL | No equipment in this test is required operable during cold shutdown or refueling operations. | Initial Criticality | 83% complete |
| 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 | 38% complete |

| TEST | TEST SECTIONS | JUSTIFICATION | PROPOSED COMPLETION | 10/04/83 Status |
|--|--|---|---------------------|---|
| 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 | 100% complete evaluation review done. |
| PT-VP202 Post LOCA Hydrogen Recombiners | Portions involving Unit 2 (Both recom- biners 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 | 0% complete. |
| 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 | 37% complete. |
| 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 | 84% complete |
| 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 | 100% complete evaluation review done. |
| SD-SI201 | ALL | For the same reasons as applied to PT-SI202 (above). | Initial Heat-up | 59% complete. |

| <u>TEST</u> | <u>TEST SECTIONS</u> | <u>JUSTIFICATION</u> | <u>PROPOSED COMPLETION</u> | 10/04/83 <u>Status</u> |
|--|--|---|----------------------------|---|
| PT-NR202 Traversing Incore Probe | ALL | No equipment in this system is required during cold shutdown or refueling operations. | Initial Criticality | 0% complete. |
| PT-OG201 Off-Gas | ALL | No equipment in this system is required during cold shutdown or refueling operations. | Initial Criticality | 66% complete. |
| PT-PC201 Primary Containment Integrity | ALL | Primary Containment Integrity is not required during cold shutdown or refueling operations. | Initial Criticality | 100% complete test being evalu- ated by engineering |
| 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 | 80% complete. |
| PT-RI201 Reactor Core Isolation Cooling | ALL | No equipment in this system is required during cold shutdown or refueling operations. | Initial Criticality | 100% complete evaluation review done |
| PT-RP202 Remote Shutdown | ALL | The remote shutdown system is not required during cold shutdown or refueling operations. | Initial Criticality | 88% complete. |
| PT-RR201 Reactor Recirculation | ALL | The reactor recirculation and flow control system is not required operable during cold shutdown or refueling operations. | Initial Criticality | 80% complete. |