

May 19, 1995

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



SUBJECT: LaSalle County Nuclear Power Station Units 1 and 2
Application for Amendment to Facility Operating Licenses NPF-11
and NPF-18, Appendix A, Technical Specifications
NRC Docket Nos. 50-373 and 50-374

Pursuant to 10 CFR 50.90, ComEd proposes to amend Appendix A, Technical Specifications of Facility Operating Licenses NPF-11 and NPF-18. The proposed change revises LaSalle Unit 1 and LaSalle Unit 2 Technical Specification Surveillance Requirement 4.7.5.1.1, Fire Suppression Water System. The proposed change involves the revision of the technical specification requirement that verifies each fire protection valve is in the correct position at least once per 31 days. The proposed change will only require a monthly visual inspection of the fire protection valves that are accessible during plant operation. The valves that are not accessible during plant operation will be visually inspected at least once per 18 months.

The proposed amendment request is subdivided as follows:

1. Attachment A gives a description and safety analysis of the proposed charges.
2. Attachment B includes the proposed changes to the Technical Specification pages for LaSalle Units 1 and 2.
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 provides an Environmental Assessment Applicability Review.

This proposed amendment has been reviewed and approved by ComEd On-Site and Off-Site Review in accordance with ComEd procedures.

There are no specific schedule requirements associated with this amendment proposal. Therefore, ComEd requests that this amendment be approved by the NRC within about six months, i.e., NRC approval by approximately November of 1995,

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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.

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



Very truly yours,

A handwritten signature in dark ink, appearing to read "Gary G. Benes". The signature is fluid and cursive, written over the printed name.

Gary G. Benes
Nuclear Licensing Administrator

Subscribed and Sworn to before me
on this 19th day of
May, 1995.

A handwritten signature in dark ink, appearing to read "Mary Jo Yack". The signature is written in a cursive style over the printed name.

Mary Jo Yack
Notary Public

Attachments:

- A. Description and Safety Analysis of the Proposed Changes
- B. Marked-Up pages to the Technical Specifications for LaSalle Unit 1 and LaSalle Unit 2
- C. Evaluation of Significant Hazards Considerations
- D. 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 proposed change involves the revision of the technical specification requirement that verifies each fire protection valve is in the correct position at least once per 31 days. The proposed change will only require a monthly visual inspection of the fire protection valves that are accessible during plant operation. The valves that are not accessible during plant operation will be visually inspected at least once per 18 months.

Description of the Current Operating License/Technical Specification Requirement

The current requirements of Technical Specification Surveillance Requirement 4.7.5.1.1, Fire Suppression Water System, requires the following:

"4.7.5.1.1 The fire suppression water system shall be demonstrated OPERABLE:

- a. At least once per 31 days by verifying that each valve (manual, power operated, or automatic) in the flow path is in its correct position.

Bases for the Current Requirement

The LaSalle Technical Specification Bases includes the following:

The OPERABILITY of the fire suppression systems ensures that adequate fire suppression capability is available to confine and extinguish fires occurring in any portion of the facility where safety related equipment is located. The fire suppression system consists of the water system, deluge and/or sprinklers, CO₂ systems, and fire hose stations. The collective capability of the fire suppression systems is adequate to minimize potential damage to safety related equipment and is a major element in the facility fire protection program.

The surveillance requirements provide assurance that the minimum OPERABILITY requirements of the fire suppression systems are met.

Description of the Need for Amending the Technical Specification

During plant operations there are, and will be, areas within the plant that should be considered inaccessible due to conditions that make personnel access undesirable due to personnel health concerns. In regards to the fire suppression water system, there are currently seven valves located within the LaSalle Unit 2 heater bay that should

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DESCRIPTION OF SAFETY ANALYSIS OF THE PROPOSED CHANGES

be considered inaccessible. The seven valves in the Unit 2 heater bay are located near areas that have 100 to 400 mrem/hr fields when the unit is at full power. Performing the surveillance for these seven valves has resulted in a total dose of approximately 50 mrem each month. Performance of the surveillance for the valves located in the Unit 2 heater bay is undesirable since it creates personnel hazards from an ALARA standpoint. Recently, the seven valves that are locked open in the heater bay were tagged with Out-Of-Services (OOS). Performance of the surveillance is now completed by verifying that the valves are listed on the OOS and that the OOS is still valid. Currently, heater bay entries are not performed to complete the surveillance. However, the practice of allowing OOS to remain open indefinitely is undesirable, and approval of this amendment would eliminate this OOS.

Therefore, ComEd requests a Technical Specification amendment to only require a monthly visual inspection of the fire protection valves that are accessible during plant operation. The valves that are not accessible during plant operation will be visually inspected at least once per 18 months. This amendment is requested for both units with the intent that if any additional fire protection valves are determined to be inaccessible in the future due to conditions that make personnel access undesirable due to personnel health concerns, those valves would also only require a visual inspection at least once per 18 months.

Description of the Amended Technical Specification Requirement

ComEd proposes that the Technical Specification be amended to require a monthly visual inspection of the fire protection valves that are accessible during plant operation as follows:

4.7.5.1.1 The fire suppression water system shall be demonstrated OPERABLE:

- a. At least once per 31 days by verifying that each valve (manual, power operated, or automatic) in the flow path accessible during plant operation is in its correct position.

In addition, a Requirement e. to perform the surveillance when the fire protection valves are accessible is proposed as follows:

- e. At least once per 18 months by verifying that each valve (manual, power operated, or automatic) in the flow path not accessible during plant operation is in its correct position.

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The verification requirement of the inaccessible valves will be satisfied by a surveillance that is performed once per 18 months when the Unit is shutdown.

Bases for the Amended Technical Specification Request

The proposed change to allow the fire protection valves that are inaccessible during power operation to only be surveilled once per 18 months will not affect the capability of the fire suppression water system.

A check of the LaSalle LER database for the entire operating lifetime of LaSalle Units 1 and 2 was performed, and there has not been any instances in which any Technical Specification related fire protection valves have been found out of position. Several instances where valves have been found unlocked have occurred, but the valves were found in the correct position. Also, in 1989 it was discovered that four fire protection valves were found to have exceeded the monthly surveillance frequency requirements (LER #89-015-00) due to procedure deficiencies that allowed these valves to be excused from surveillance during instances of high radiation levels. Surveillances were then performed and the valves were found to be in their normally locked open positions. This 100% record of properly positioned valves is strong evidence that valve tampering is not a problem.

The seven valves that are currently inaccessible during power operation are all locked in the open position (all fire protection valves that are in the fire suppression water flow path are either locked or seal wired in the required position). As described, the areas these valves are in are relatively inaccessible at power, so access to these areas is very limited. Based on these facts, combined with the 100% plant lifetime record of properly positioned Technical Specification related fire protection valves, it can be concluded that the fire protection valves that are inaccessible during power operation can be visually inspected only once per 18 months with virtually no risk to the operability of the fire protection water systems.

To ensure these conditions remain valid, any Technical Specification fire protection valves that may be determined to be inaccessible in the future by the On-site Review and Investigative Function will be verified locked in the appropriate position within 31 days prior to establishing the change in surveillance frequency.

This change will make Technical Specification 3.7.5.1, Fire Suppression Water System, consistent with Technical Specification 3.7.5.4, Fire Hose Stations, in regards to only requiring a monthly visual inspection of the equipment that is accessible during plant operations, with the equipment that is not accessible during plant operation to be visually inspected at least once per 18 months.

ATTACHMENT A
DESCRIPTION OF SAFETY ANALYSIS OF THE PROPOSED CHANGES

Schedule

There are no specific schedule requirements associated with this amendment proposal. Therefore, ComEd requests that this amendment be approved by the NRC within about six months, i.e., NRC approval by approximately November of 1995, with 30 days required for implementation of the approved amendments.