

ATTACHMENT B

PROPOSED AMENDMENTS TO THE LICENSE/TECHNICAL SPECIFICATIONS

NPF-11

3/4 7-11*

3/4 7-12

NPF-18

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* These pages do not have changes; they are included for information only.

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PLANT SYSTEMS

3/4.7.5 FIRE SUPPRESSION SYSTEMS

FIRE SUPPRESSION WATER SYSTEM

LIMITING CONDITION FOR OPERATION

3.7.5.1 The fire suppression water system shall be OPERABLE* with:

- a. Two OPERABLE fire suppression diesel driven fire pumps, each with a capacity of 2500 gpm, with their discharge aligned to the fire suppression header,
- b. An OPERABLE flow path capable of taking suction from the CSCS water tunnel and transferring the water through distribution piping with OPERABLE sectionalizing control or isolation valves to the yard hydrant curb valves, the last valve ahead of the water flow alarm device on each sprinkler, hose standpipe, and the last valve ahead of the deluge valve on each deluge or spray system required to be OPERABLE per Specifications 3.7.5.2 and 3.7.5.4.

APPLICABILITY: At all times.

ACTION:

- a. With one fire pump and/or one water supply inoperable, restore the inoperable equipment to OPERABLE status within 7 days or, prepare and submit a Special Report to the Commission pursuant to Specification 6.6.C within the next 30 days outlining the plans and procedures to be used to restore the inoperable equipment to OPERABLE status or to provide an alternate backup pump or supply. The provisions of Specification 3.0.3 are not applicable.
- b. With the fire suppression water system otherwise inoperable:
 1. Establish a backup fire suppression water system within 24 hours, and
 2. Prepare and submit a Special Report in accordance with Specification 6.6.C;
 - a) By telephone within 24 hours,
 - b) Confirmed by telegraph, mailgram or facsimile transmission no later than the first working day following the event, and
 - c) In writing within 14 days following the event, outlining the action taken, the cause of the inoperability and the plans and schedule for restoring the system to OPERABLE status.

*The normal or emergency power source may be inoperable in OPERATIONAL CONDITION 4 or 5 or when defueled.

PLANT SYSTEMS

SURVEILLANCE REQUIREMENTS

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 - accessible during plant operation
- b. At least once per 12 months by cycling each testable valve in the flow path through at least one complete cycle of full travel.
- c. At least once per 18 months by performing a system functional test which includes simulated automatic actuation of the system throughout its operating sequence, and:
 1. Verifying that each automatic valve in the flow path actuates to its correct position,
 2. Verifying that each fire suppression pump develops at least 3750 gpm at a system head of 205 feet,
 3. Cycling each valve in the flow path that is not testable during plant operation through at least one complete cycle of full travel, and
 4. Verifying that each fire suppression pump starts sequentially to maintain the fire suppression water system pressure greater than or equal to 118 psig.
- d. At least once per 3 years by performing a flow test of the system in accordance with Chapter 5, Section 11 of the Fire Protection Handbook, 14th Edition, published by the National Fire Protection Association.

4.7.5.1.2 Each diesel driven fire suppression pump shall be demonstrated OPERABLE:

- a. At least once per 31 days by:
 1. Verifying the fuel day tank contains at least 130 gallons of fuel.
 2. Starting:
 - a) The fuel transfer pump and transferring fuel from the storage tank to the day tank.
 - b) The diesel driven pump from ambient conditions and operating for at least 30 minutes on recirculation flow.

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.

PLANT SYSTEMS

SURVEILLANCE REQUIREMENTS

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- 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.
- b. At least once per 12 months by cycling each testable valve in the flow path through at least one complete cycle of full travel.
- c. At least once per 18 months by performing a system functional test which includes simulated automatic actuation of the system throughout its operating sequence, and:
 1. Verifying that each automatic valve in the flow path actuates to its correct position,
 2. Verifying that each fire suppression pump develops at least 3750 gpm at a system head of 205 feet,
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- 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.

4.7.5.1.2 Each diesel-driven fire suppression pump shall be demonstrated OPERABLE:

- a. At least once per 31 days by:
 1. Verifying the fuel day tank contains at least 130 gallons of fuel.
 2. Starting:
 - a) The fuel transfer pump and transferring fuel from the storage tank to the day tank.
 - b) The diesel-driven pump from ambient conditions and operating for at least 30 minutes on recirculation flow.

PLANT SYSTEMS

3/4.7.5 FIRE SUPPRESSION SYSTEMS

FIRE SUPPRESSION WATER SYSTEM

LIMITING CONDITION FOR OPERATION

3.7.5.1 The fire suppression water system shall be OPERABLE* with:

- a. Two OPERABLE fire suppression diesel driven fire pumps, each with a capacity of 2500 gpm, with their discharge aligned to the fire suppression header,
- b. An OPERABLE flow path capable of taking suction from the CSCS water tunnel and transferring the water through distribution piping with OPERABLE sectionalizing control or isolation valves to the yard hydrant curb valves, the last valve ahead of the water flow alarm device on each sprinkler, hose standpipe, and the last valve ahead of the deluge valve on each deluge or spray system required to be OPERABLE per Specifications 3.7.5.2 and 3.7.5.4.

APPLICABILITY: At all times.

ACTION:

- a. With one fire pump and/or one water supply inoperable, restore the inoperable equipment to OPERABLE status within 7 days or, prepare and submit a Special Report to the Commission pursuant to Specification 6.6.C within the next 30 days outlining the plans and procedures to be used to restore the inoperable equipment to OPERABLE status or to provide an alternate backup pump or supply. The provisions of Specification 3.0.3 are not applicable.
- b. With the fire suppression water system otherwise inoperable:
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PLANT SYSTEMS

SURVEILLANCE REQUIREMENTS

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- 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 accessible during plant operation
- b. At least once per 12 months by cycling each testable valve in the flow path through at least one complete cycle of full travel.
- c. At least once per 18 months by performing a system functional test which includes simulated automatic actuation of the system throughout its operating sequence, and:
 1. Verifying that each automatic valve in the flow path actuates to its correct position,
 2. Verifying that each fire suppression pump develops at least 3750 gpm at a system head of 205 feet,
 3. Cycling each valve in the flow path that is not testable during plant operation through at least one complete cycle of full travel, and
 4. Verifying that each fire suppression pump starts sequentially to maintain the fire suppression water system pressure greater than or equal to 118 psig.
- d. At least once per 3 years by performing a flow test of the system in accordance with Chapter 5, Section 11 of the Fire Protection Handbook, 14th Edition, published by the National Fire Protection Association.

4.7.5.1.2 Each diesel-driven fire suppression pump shall be demonstrated OPERABLE:

- a. At least once per 31 days by:
 1. Verifying the fuel day tank contains at least 130 gallons of fuel.
 2. Starting:
 - a) The fuel transfer pump and transferring fuel from the storage tank to the day tank.
 - b) The diesel-driven pump from ambient conditions and operating for at least 30 minutes on recirculation flow.

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.

PLANT SYSTEMS

SURVEILLANCE REQUIREMENTS

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ATTACHMENT C

SIGNIFICANT HAZARDS CONSIDERATIONS

Commonwealth Edison has evaluated the proposed Technical Specification Amendment and determined that it does not represent a significant hazards consideration. Based on the criteria for defining a significant hazards consideration established in 10 CFR 50.92, operation of LaSalle County Station Units 1 and 2 in accordance with the proposed amendment will not:

- 1) Involve a significant increase in the probability or consequences of an accident previously evaluated because:

The proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated in the UFSAR. The proposed change only changes the testing frequency for valves that are inaccessible during power operation. 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. Therefore, the change to the frequency of testing will have no effect on the capability of fire suppression water systems, since all Technical Specification fire protection valves, both accessible and inaccessible at power operation, have a plant history of 100% correct valve lineup during monthly surveillances. Additionally, all fire protection valves that are in the fire suppression water flow path are either locked or seal wired in the required position at all times. The change does not impact the probability of any fire or other accident occurrence. Therefore, the proposed change does not cause an increase in the probability or consequences of an accident previously evaluated.

- 2) Create the possibility of a new or different kind of accident from any accident previously evaluated because:

The proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated in the UFSAR. The proposed change only changes the testing frequency for valves that are inaccessible during power operation. The change to the frequency of testing will have no effect on the capability of fire suppression water systems, since the valves, both accessible and inaccessible at power operation, have a plant lifetime history of 100% correct valve lineup during monthly surveillances. Additionally, these valves are locked or sealed in the required position at all times. The change does not alter the performance of the fire suppression water system, and therefore introduces no new failure modes. With no alteration or degradation to equipment or system operation, the change introduces no new accident or malfunction.

ATTACHMENT C
SIGNIFICANT HAZARDS CONSIDERATIONS

- 3) Involve a significant reduction in the margin of safety because:

The proposed change does not reduce the margin as defined in the bases for any Technical Specification. The proposed change only changes the testing frequency for all Technical Specification fire protection valves that are inaccessible during power operation. The plant history of 100% correct valve lineup for the Technical Specification fire protection valves, combined with the fact that these valves are always locked or sealed in the required position ensures that the bases' minimum OPERABILITY requirements of the fire suppression systems are met.

Guidance has been provided in "Final Procedures and Standards on No Significant Hazards Considerations," Final Rule, 51 FR 7744, for the application of standards to license change requests for determination of the existence of significant hazards considerations. This document provides examples of amendments which are and are not considered likely to involve significant hazards considerations. These proposed amendments most closely fit the example of a change which may either result in some increase to the probability or consequences of a previously analyzed accident or may reduce in some way a safety margin, but where the results of the change are clearly within all acceptance criteria with respect to the system or component specified in the standard review plan.

This proposed amendment does not involve a significant relaxation of the criteria used to establish safety limits, a significant relaxation of the bases for the limiting safety system settings or a significant relaxation of the bases for the limiting conditions for operations. Therefore, based on the guidance provided in the Federal Register and the criteria established in 10 CFR 50.92(c), the proposed change does not constitute a significant hazards consideration.

ATTACHMENT D
ENVIRONMENTAL ASSESSMENT STATEMENT APPLICABILITY REVIEW

Commonwealth Edison has evaluated the proposed amendment against the criteria for identification of licensing and regulatory actions requiring environmental assessment in accordance with 10 CFR Part 51.21. It has been determined that the proposed changes meet the criteria for categorical exclusion as provided for under 10 CFR Part 51.22(c)(9). This conclusion has been determined because the changes requested do not pose significant hazards considerations or do not involve a significant increase in the amounts, and no significant changes in the types of any effluents that may be released off-site. Additionally, this request does not involve a significant increase in individual or cumulative occupational radiation exposure.