

ATTACHMENT B

TECHNICAL SPECIFICATION CHANGES FOR LASALLE UNIT 2

SUMMARY OF PROPOSED CHANGES FOR LASALLE UNIT 2 (NPF-18)

Section 3.4.2 Page 3/4 4-6	SRV safety valve function lift setting tolerances changed from +1%, -3% to $\pm 3\%$; SRV as-left safety valve function lift setting tolerances specified to be $\pm 1\%$
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REACTOR COOLANT SYSTEM

3/4.4.2 SAFETY/RELIEF VALVES

LIMITING CONDITION FOR OPERATION

3.4.2 The safety valve function of 17 of the below listed 18 reactor coolant system safety/relief valves shall be OPERABLE with the specified code safety valve function lift setting^a; all installed valves shall be closed with OPERABLE position indication.

- a. 4 safety/relief valves @ 1205 psig
 - b. 4 safety/relief valves @ 1195 psig
 - c. 4 safety/relief valves @ 1185 psig
 - d. 4 safety/relief valves @ 1175 psig
 - e. 2 safety/relief valves @ 1150 psig
- Handwritten note:* $\pm 3\%$ (with arrows pointing to the pressure values in the list)

APPLICABILITY: OPERATIONAL CONDITIONS 1, 2, and 3.

ACTION:

- a. With the safety valve function of one or more of the above required safety/relief valves inoperable, be in at least NOT SHUTDOWN within 12 hours and in COLD SHUTDOWN within the next 24 hours.
- b. With one or more safety/relief valves stuck open, provided that suppression pool average water temperature is less than 110°F, close the stuck open relief valve(s); if unable to close the open valve(s) within 2 minutes or if suppression pool average water temperature is 110°F or greater, place the reactor mode switch in the Shutdown position.
- c. With one or more of the above required safety/relief valve stem position indicators inoperable, restore the inoperable stem position indicators to OPERABLE status within 7 days or be in at least NOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.

SURVEILLANCE REQUIREMENTS

4.4.2.1 The safety/relief valve stem position indicators of each safety/relief valve shall be demonstrated OPERABLE by performance of a:

- a. CHANNEL CHECK at least once per 31 days, and a
- b. CHANNEL CALIBRATION at least once per 18 months.^{**}

4.4.2.2 The low low set function shall be demonstrated not to interfere with the OPERABILITY of the safety/relief valves or the ADS by performance of a CHANNEL CALIBRATION at least once per 18 months.

^aThe lift setting pressure shall correspond to ambient conditions of the valves at nominal operating temperatures and pressures.

Up to two inoperable valves may be replaced with spare OPERABLE valves with lower setpoints until the next refueling outage.

^{**}The provisions of Specification 4.0.4 are not applicable provided the surveillance is performed within 12 hours after reactor steam pressure is adequate to perform the test.

Handwritten note: Following testing, lift settings shall be within $\pm 1\%$.

ATTACHMENT C

SIGNIFICANT HAZARDS CONSIDERATION

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 Unit 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 probability of an accident previously evaluated will not increase as a result of this change, because the only changes are the tolerances for the SRV opening setpoints and the speed of the RCIC turbine and pump. Changing the maximum allowable opening setpoint for the SRVs does not cause any accident previously evaluated to occur, or degrade valve or system performance in any way so as to cause an accident to occur with an increased frequency. In addition, the increased speed of the RCIC turbine and pump are within the design limits of the system. RCIC operability and failure probabilities are not impacted by this change. This is supported by the Safety Analysis (Attachment A) and in Attachments E and G (GE and S&L Analyses, respectively).

The consequences of an ASME Overpressurization Event are not significantly increased and do not exceed the previously accepted licensing criteria for this event. GE has calculated the revised peak vessel pressure for LaSalle Station to be 1341 psig, which is well below the 1375 psig criterion of the ASME Code for upset conditions, referenced in Section 5.2.2, Overpressurization Protection, of the Updated Final Safety Analysis Report (UFSAR), and NUREG-0519 (Safety Evaluation Report related to the operation of LaSalle County Station, Units 1 and 2, March 1981), and Section 15.2-4, Closure of Main Steam Isolation Valves (BWR) of NUREG-0800 (Standard Review Plan).

GE has also performed an analysis of the limiting Anticipated Transient Without Scram (ATWS) event, which is the MSIV Closure Event. This analysis calculated the peak vessel pressure to be 1457 psig, which is well below the 1500 psig criterion of the ASME Code for emergency conditions.

Per NUREG-0519, listed above, Section 5.4.1, and Technical Specification 4.7.3.b, the RCIC pump is required to develop flow greater than or equal to 600 gpm in the test flow path with a system head corresponding to reactor vessel operating pressure when steam is supplied to the turbine at 1000 +20, -80 psig. Increasing

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the turbine and pump speed ensures these criteria will still be met and the consequences of an accident will not increase.

The conclusions given in Attachments A, E, and G with regards to containment dynamic loads, high pressure system performance, main steam piping loads, LOCA impact and MCPR impact also show that current accident and transient analyses are not impacted by this change beyond those reanalyzed by GE in Attachment E.

Therefore, there is not a significant increase in the 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 only physical changes are to increase the allowable tolerances for SRV opening setpoints and to increase the RCIC pump and turbine speeds. These changes do not result in any changed component interactions. The SRVs and RCIC will still provide the functions for which they were designed. Since all of the other systems evaluated in Attachments A, E, and G will continue to function as intended, the proposed changes do not create the possibility of a new or different kind of accident from any previously evaluated.

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

While the calculated peak vessel pressures for the ASME Overpressurization Event and the MSIVC ATWS Event are larger than that previously calculated without the proposed setpoint tolerance increases, the new peak pressures remain far below the respective licensing acceptance limits associated with these events. These licensing acceptance limits have been previously evaluated as providing a sufficient margin of safety. For other accidents and transients, the increased setpoint tolerances have a negligible, if any, effect on the results, so the margin of safety is preserved.

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

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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 acceptable criteria with respect to the system or component specified in the applicable 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 51.21. It has been determined that the proposed changes meet the criteria for a categorical exclusion as provided under 10 CFR 51.22 (c)(9). This conclusion has been determined because the changes requested do not pose significant hazards consideration or do not involve a significant increase in the amounts, and no significant changes in the types, of any effluents that may be released offsite. Additionally, this request does not involve a significant increase in individual or cumulative occupational radiation exposure.

ATTACHMENT E

GE SRV SETPOINT TOLERANCE RELAXATION ANALYSIS

FOR

LASALLE COUNTY STATION UNITS 1 AND 2

ATTACHMENT F

WITHHOLDING AFFIDAVIT

FOR

GENERAL ELECTRIC SRV SETPOINT TOLERANCE

RELAXATION ANALYSIS REPORT

General Electric Company

AFFIDAVIT

I, George B. Stramback, being duly sworn, depose and state as follows:

- (1) I am Project Manager, Licensing Services, General Electric Company ("GE") and have been delegated the function of reviewing the information described in paragraph (2) which is sought to be withheld, and have been authorized to apply for its withholding.
- (2) The information sought to be withheld is contained in the GE proprietary report GE-NE-B13-01760, *Safety Review for La Salle County Station Units 1 and 2, Safety/Relief Valves Reduction and Setpoint Tolerance Relaxation Analyses*, Class III (GE Proprietary Information), dated March 1995. The proprietary information is delineated by bars marked in the margin adjacent to the specific material.
- (3) In making this application for withholding of proprietary information of which it is the owner, GE relies upon the exemption from disclosure set forth in the Freedom of Information Act ("FOIA"), 5 USC Sec. 552(b)(4), and the Trade Secrets Act, 18 USC Sec. 1905, and NRC regulations 10 CFR 9.17(a)(4), 2.790(a)(4), and 2.790(d)(1) for "trade secrets and commercial or financial information obtained from a person and privileged or confidential" (Exemption 4). The material for which exemption from disclosure is here sought is all "confidential commercial information", and some portions also qualify under the narrower definition of "trade secret", within the meanings assigned to those terms for purposes of FOIA Exemption 4 in, respectively, Critical Mass Energy Project v. Nuclear Regulatory Commission, 975F2d871 (DC Cir. 1992), and Public Citizen Health Research Group v. FDA, 704F2d1280 (DC Cir. 1983).
- (4) Some examples of categories of information which fit into the definition of proprietary information are:
 - a. Information that discloses a process, method, or apparatus, including supporting data and analyses, where prevention of its use by General Electric's competitors without license from General Electric constitutes a competitive economic advantage over other companies;
 - b. Information which, if used by a competitor, would reduce his expenditure of resources or improve his competitive position in the design, manufacture, shipment, installation, assurance of quality, or licensing of a similar product;

- c. Information which reveals cost or price information, production capacities, budget levels, or commercial strategies of General Electric, its customers, or its suppliers;
- d. Information which reveals aspects of past, present, or future General Electric customer-funded development plans and programs, of potential commercial value to General Electric;
- e. Information which discloses patentable subject matter for which it may be desirable to obtain patent protection.

The information sought to be withheld is considered to be proprietary for the reasons set forth in both paragraphs (4)a. and (4)b., above.

- (5) The information sought to be withheld is being submitted to NRC in confidence. The information is of a sort customarily held in confidence by GE, and is in fact so held. The information sought to be withheld has, to the best of my knowledge and belief, consistently been held in confidence by GE, no public disclosure has been made, and it is not available in public sources. All disclosures to third parties including any required transmittals to NRC, have been made, or must be made, pursuant to regulatory provisions or proprietary agreements which provide for maintenance of the information in confidence. Its initial designation as proprietary information, and the subsequent steps taken to prevent its unauthorized disclosure, are as set forth in paragraphs (6) and (7) following.
- (6) Initial approval of proprietary treatment of a document is made by the manager of the originating component, the person most likely to be acquainted with the value and sensitivity of the information in relation to industry knowledge. Access to such documents within GE is limited on a "need to know" basis.
- (7) The procedure for approval of external release of such a document typically requires review by the staff manager, project manager, principal scientist or other equivalent authority, by the manager of the cognizant marketing function (or his delegate), and by the Legal Operation, for technical content, competitive effect, and determination of the accuracy of the proprietary designation. Disclosures outside GE are limited to regulatory bodies, customers, and potential customers, and their agents, suppliers, and licensees, and others with a legitimate need for the information, and then only in accordance with appropriate regulatory provisions or proprietary agreements.
- (8) The information identified in paragraph (2), above, is classified as proprietary because it contains detailed results of analytical methods and processes, including computer codes, which GE has developed, obtained NRC approval of, and applied to perform evaluations of the safety relief valves for the BWR.

The development and approval of the BWR computer codes used in this analysis was achieved at a significant cost, on the order of several million dollars, to GE.

The development of the evaluation process along with the interpretation and application of the analytical results is derived from the extensive experience database that constitutes a major GE asset.

- (9) Public disclosure of the information sought to be withheld is likely to cause substantial harm to GE's competitive position and foreclose or reduce the availability of profit-making opportunities. The information is part of GE's comprehensive BWR safety and technology base, and its commercial value extends beyond the original development cost. The value of the technology base goes beyond the extensive physical database and analytical methodology and includes development of the expertise to determine and apply the appropriate evaluation process. In addition, the technology base includes the value derived from providing analyses done with NRC-approved methods.

The research, development, engineering, analytical and NRC review costs comprise a substantial investment of time and money by GE.

The precise value of the expertise to devise an evaluation process and apply the correct analytical methodology is difficult to quantify, but it clearly is substantial.

GE's competitive advantage will be lost if its competitors are able to use the results of the GE experience to normalize or verify their own process or if they are able to claim an equivalent understanding by demonstrating that they can arrive at the same or similar conclusions.

The value of this information to GE would be lost if the information were disclosed to the public. Making such information available to competitors without their having been required to undertake a similar expenditure of resources would unfairly provide competitors with a windfall, and deprive GE of the opportunity to exercise its competitive advantage to seek an adequate return on its large investment in developing these very valuable analytical tools.

STATE OF CALIFORNIA)
)
COUNTY OF SANTA CLARA)

ss:

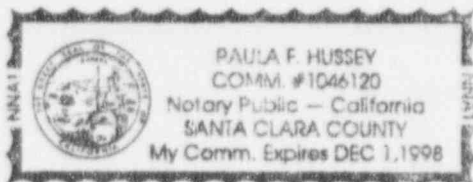
George B. Stramback, being duly sworn, deposes and says:

That he has read the foregoing affidavit and the matters stated therein are true and correct to the best of his knowledge, information, and belief.

Executed at San Jose, California, this 29th day of March 1995.

George B. Stramback
George B. Stramback
General Electric Company

Subscribed and sworn before me this 29th day of March 1995.



Paula F. Hussey
Notary Public, State of California