



Commonwealth Edison

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March 21, 1984

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Subject: LaSalle County Station Unit 2
Technical Specification Certification
NRC Docket No. 50-374

Reference (a): D. G. Eisenhower letter to Cordell Reed
dated March 8, 1984.

(b): C.W. Schroeder letter to H. R. Denton
dated January 13, 1984.

Dear Mr. Denton:

The purpose of this letter is to respond to Reference (a).

The interaction of LaSalle County Station personnel with the Standard Technical Specifications dates back to approximately 1974 when G. J. Diederich, then Assistant Superintendent for Operations, was a member of the BWR Standard Technical Specifications Committee. Mr. Diederich, who is now Station Superintendent at LaSalle County Station, thus gained first hand knowledge of the development, philosophy, and NRC staff positions as they were incorporated into the original BWR Standard Technical Specifications (STS).

In 1978, Commonwealth Edison Company prepared the original draft of the LaSalle County Station Technical Specifications. This preparation included reviews by individual system test engineers, departmental reviews and a series of meetings with the entire operating staff to review the tech specs in detail. Further reviews were performed on a chapter by chapter basis by the NSSS vendor (GE) and the A/E (Sargent and Lundy). Following submittal of FSAR Chapter 16 (Amendment 39, October 1978), the NRC requested that future versions be submitted as marked up copies of the GE STS. This was performed as requested.

Two years prior to the Unit 1 license issue, the Tech Specs for Unit 1 were thoroughly reviewed by Commonwealth Edison Engineering, Station Staff, Nuclear Licensing, and Nuclear Safety for accuracy. These reviews included providing each page and all subsequent changes to the applicable system test engineers and other "experts" for review and comment. These comments were reviewed and many discussions were held within the Company and with NRR (Messrs. Bottimore, Bournia and reviewers).

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NRR issued many changes during this period (several dozen) to incorporate staff requirements, design changes and CECO requests. These changes also received multiple reviews by cognizant individuals.

During the almost two full years since the Unit 1 License NPF-11 was issued, it has been our experience that the Unit 1 Technical Specifications accurately reflect the plant and the FSAR. Certain specifications were found to have minor discrepancies that were either corrected by license amendments or were determined to be adequately controlled and identified in the Unit 1 Technical Specification upgrade to match Unit 2 (Reference b). The Unit 2 Tech Spec preparation started with the current Unit 1 Tech Spec at the time as the draft document and changes were made where differences existed. This was submitted to NRR as a draft. Additional changes were made and submitted in May, 1983 to D. Hoffman (NRR). These changes included improvements over Unit 1, clarifications, relaxations and new revised staff requirements where necessary. Such changes were held (at NRC request) for review and issuance at Unit 2 licensing, with the intention to then promptly backfit on Unit 1. The proof and review copy was received in August, 1983 and again was reviewed on site for accuracy by system test engineers and other "experts". Subsequently discussions were held with the staffs' reviewers including, a meeting at the Bethesda offices on September 20, 1983. Since the license condition identified in SSER Supplement 5 item 1.10(7)(1) on reactor containment electrical penetrations' redundant fault current devices was not issued due to installation of subject devices, a clarifying upgrade to the Unit 2 Technical Specification 3.8.3.2 will be submitted as an administrative change to note the backup devices.

The status of Unit 1 and Unit 2 Technical Specifications has been discussed on several occasions between the NRC Staff and Commonwealth Edison Company. During the Unit 2 operational readiness review meeting in Bethesda, Commonwealth Edison Company again stated our intention to upgrade the Unit 1 Technical Specifications to match the Unit 2 Technical Specifications. This action was agreed to by NRR management. On January 13, 1984, Reference (b) was submitted to fulfill our commitment. These changes were justified based on the fact that the NRC had just issued the exact same specifications on Unit 2 less than a month before (12/16/83). The NRC rejected this Unit 1 Technical Specification amendment request. Commonwealth Edison Company is in the process of reformatting our request and expect resubmittal in the near future.

It is our understanding that the NRC Region III recently concluded an extensive onsite review of the Technical Specifications for Containment Isolation and AC/DC power. We understand that review, which will be documented in an inspection report to be issued in the near future, concluded that those specifications are technically adequate.

March 21, 1984

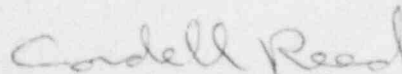
Based upon the detailed, iterative process utilized to prepare the Unit 1 Technical Specifications, the positive two year operating experience with the Unit 1 Technical Specifications, the use of the Unit 1 Technical Specifications as the basis for the Unit 2 Technical Specifications, and the positive three month experience since the operating license was issued with the Unit 2 Technical Specifications, I conclude and certify that the Unit 2 Technical Specifications do accurately reflect the plant and the FSAR. Furthermore, I am satisfied that, because of these factors, no further adequacy reviews are warranted by Commonwealth Edison Company at this time.

Certain issues as to the interpretations of specifications and overly restrictive action statements that have been previously identified by Commonwealth Edison Company, owners groups, and NRR generic letters will continue to be pursued. Commonwealth Edison Company is also participating in the BWR Owners Group Technical Specification Improvements Committee and expects substantial changes in Technical Specifications to result from that effort. Finally, we are encouraged by the work that the NRC is initiating (NUREG-1024) to provide an overall upgrade of Technical Specifications.

To the best of my knowledge and belief the statements contained herein are true and correct. In some respects these statements are not based on my personal knowledge but upon information furnished by other Commonwealth Edison and contractor employees. Such information has been reviewed in accordance with Company practice and I believe it to be reliable.

Enclosed for your use are one signed original and thirty-nine (39) copies of this letter.

Very truly yours,

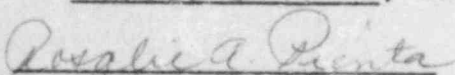


Cordell Reed
Vice President

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cc: Dr. A. Bournia - TSC
NRC Resident Inspector - LSCS

SUBSCRIBED and SWORN to
before me this 21st day
of March, 1984


Notary Public