

August 28, 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 of Facility Operating Licenses
NPF-11 and NPF-18, Appendix A, Technical
Specifications, and Exemption to Appendix J of 10CFR50
Regarding Elimination of MSIV Leakage Control System
and Increased MSIV Leakage Limits
NRC Docket Nos. 50-373 and 50-374

REFERENCES: See Attachment of References

Pursuant to 10 CFR 50.90, Commonwealth Edison (ComEd) proposes to amend Appendix A, Technical Specifications, of Facility Operating Licenses NPF-11 and NPF-18 (LaSalle County Station Units 1 and 2) to support elimination of the Main Steam Isolation Valve Leakage Control System (MSIV LCS) and instead use the main steamline drains and condenser to process MSIV leakage. The proposed changes would also increase the allowable MSIV leakage from 100 scfh for all four main steam lines to 100 scfh per steam line (400 scfh for all four main steam lines). Evaluations to demonstrate seismic adequacy of the proposed alternate leakage pathway for each unit, as well as calculations of off-site and main control room doses are also included with this request.

Also included with this submittal pursuant to 10CFR50.12(a), ComEd hereby requests an exemption for LaSalle Station Units 1 and 2 for MSIV leakages from the acceptance test criteria specified in Appendix J of 10CFR50. This will replace an exemption granted by NUREG 0519 as modified by NUREG 0519, Supplement 6 (References 1 and 2). Changes to Section 2.D of Unit 1 and Unit 2 License NPF-11 and NPF-18, respectively, are proposed for documentation of exemption approval.

As part of this amendment request, two additional changes are requested:

1. Removal of a list of MSIV LCS motor operated valves from the table of Motor Operated Valves Thermal Overload Protection.
2. A minor correction is also made to Index page XIV. This Bases Index correction was erroneously left out of the amendment request approved in Reference 3, which deleted the section still listed on this index page.

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The requested changes are consistent with the results of work performed by the BWR Owner's Group (BWROG) in support of the resolution of Generic Issue C-8, "MSIV Leakage and LCS Failure". The GE BWROG Generic Topical Report, NEDC-31858P, which was the product of this work, is listed as Reference 6.

ComEd requests that this amendment be categorized as a Cost Benefit Licensing Action (CBLA). The amendment will save approximately \$345,000 per year. These savings will be realized through elimination of MSIV Leakage Control System valve and instrumentation surveillances and by reducing the number of MSIV refurbishments that are necessary due to leakage. Worker dose will also be reduced, and the frequency of outage extensions due to unanticipated MSIV refurbishments will decrease.

This amendment request closely resembles license amendments approved for Limerick-2 (Reference 4) and Edwin I. Hatch (Reference 5).

This proposed amendment request is subdivided as follows:

1. Attachment A gives a description and safety analysis of the proposed changes in this amendment.
2. Attachment B includes a summary of the proposed changes and the marked-up License/Technical Specifications pages for LaSalle Units 1 and 2 with the requested changes indicated.
3. Attachment C is an application for exemption to Appendix J of 10CFR50.
4. Attachment D describes ComEd's evaluation performed in accordance with 10 CFR 50.92 (c), which confirms that no significant hazard consideration is involved.
5. Attachment E provides an Environmental Assessment Applicability Review per 10 CFR 51.21.
6. Attachment F is the input assumptions to the General Electric Report detailing the off-site dose calculation results for LaSalle Station.
7. Attachment G is a General Electric Report detailing the off-site dose calculation results for LaSalle Station.

August 28, 1995

8. Attachment H is the Sargent and Lundy Seismic Report for LaSalle Unit 1.
9. Attachment I is the Sargent and Lundy Seismic Report for LaSalle Unit 2.

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

ComEd requests that NRC review of the Technical Specification changes be completed by LaSalle Unit 1 Cycle 7 shutdown, which is scheduled to occur January 27, 1996, so that the necessary modifications can proceed with assurance that this licensing amendment is acceptable to your staff. It is requested that implementation for the individual units be upon startup from refueling after each unit's Cycle 7.

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,

Gary G. Benes
Gary G. Benes

Nuclear Licensing Administrator

Subscribed and Sworn to before me
on this 28th day of
August, 1995.

Mary Jo Yack
Notary Public

Attachments:

- A. Description of Safety Analysis of the Proposed Changes
- B. Proposed License/Technical Specification Pages
- C. Application for Exemption to Appendix J of 10CFR50
- D. Evaluation of Significant Hazards Considerations
- E. Environmental Assessment Applicability Review
- F. Input Assumptions to General Electric Dose Calculations Report
- G. General Electric Dose Calculations Report
- H. Sargent & Lundy Seismic Report, Unit 1
- I. Sargent & Lundy Seismic Report, Unit 2

cc: H. J. Miller - Regional Administrator, Region III
R. M. Latta - Project Manager, NRR
P. G. Brochman, Senior Resident Inspector - LaSalle County Station
Office of Nuclear Facility Safety - IDNS

ATTACHMENT OF REFERENCES

1. NUREG-0519, Safety Evaluation Report Related to the Operation of LaSalle County Station Units 1 and 2, dated March 1981.
2. NUREG-0519 Supplement 6, Safety Evaluation Report Related to the Operation of LaSalle County Station Units 1 and 2, dated November 1983.
3. Letter, W. D. Reckley to D. L. Farrar, "Issuance of Amendments (TAC Nos. M90702 and M90703)", March 16, 1995.
4. Letter, F. Rinaldi, NRR, to J. A. Hunger, Jr., "Increase Allowable MSIV Leak Rate and Deletion of MSIV LCS - Limerick Generating Station, Unit 2 (TAC NO. M88656)", February 16, 1995.
5. Letter, K. N. Jabbour, NRR, to J. T. Beckham, Jr., "Issuance of Amendment - Edwin I. Hatch Nuclear Plant, Unit 2 (TAC NO. M87850)", March 17, 1994.
6. GE Document, "BWROG Report for Increasing MSIV Leakage Rate Limits and Elimination of Leakage Control Systems", NEDC 31858P, Revision 2, which was submitted to the NRC by BWROG letter dated October 4, 1993.

ATTACHMENT A

DESCRIPTION AND SAFETY ANALYSIS OF PROPOSED CHANGES TO APPENDIX A, TECHNICAL SPECIFICATIONS OF FACILITY OPERATING LICENSES NPF-11 and NPF-18

Description of the Proposed Change

ComEd proposes to replace the use of the MSIV LCS for processing MSIV leakage with the main steamlines, main steamline drains, and the main condenser. Because this arrangement provides a higher capacity for processing leakage than the existing LCS, this request would also change the allowable MSIV leakage from 100 scfh for all four main steam lines to 100 scfh per steam line (400 scfh for all four main steam lines).

A request for exemption of the MSIV leakages from the overall integrated leak rate test (Type A) and the combined local leak rate test (Type B and C) criteria of Appendix J is also included with this submittal as Attachment C. Changes to Section 2.D of Unit 1 and Unit 2 Licenses NPF-11 and NPF-18, respectively, are proposed for documentation of exemption approval, and marked up pages are included in Attachment B.

MSIV LCS motor operated valves are being deleted from Table 3.8.3.3-1, Motor Operated Valves Thermal Overload Protection, because the valves are being eliminated with the MSIV LCS.

As part of this amendment request, a minor correction is also made to Index page XIV. This Bases Index correction was erroneously left out of the amendment request approved in Reference 3.

Description of the Current Requirement

The LaSalle Units 1 and 2 Technical Specifications provide a requirement in Section 3.6.1.4 for operability of the Main Steam Isolation Valve Leakage Control System (MSIV LCS), including provisions for performance of various system functional tests which provide assurance of system operability.

The other applicable Technical Specification requirement is the Section 4.6.3.6 surveillance requirement for operability of the MSIVs. The total leakage of all four Main Steam Lines (through the MSIVs) must be less than or equal to 100 scfh.

MSIV LCS motor operated valves are listed in Table 3.8.3.3-1, Motor Operated Valves Thermal Overload Protection, because they have thermal overload protection that is bypassed during an accident condition.

Bases for the Current Requirement

Following a design basis seismic event, the integrity of some of the auxiliary main steam supply lines which were not originally seismically qualified could be violated due to excessive vibration. If this seismic event also coincided with a design basis Loss-Of-Coolant Accident (LOCA) in which substantial core degradation occurred, any vessel leakage through the MSIVs (and its associated radioactive products) could bypass secondary containment or escape through a non-seismically qualified line in the turbine building that ruptures during the event.

The MSIV LCS provides an alternate flowpath for MSIV leakage to secondary containment, where it can be treated by the Standby Gas Treatment system and released in a controlled manner through the stack. A diagram of the LCS at LaSalle is shown in Figure 1.

MSIV LCS motor operated valves are currently required to have bypass devices of the thermal overload protection to ensure that the thermal overload protection will not prevent safety related valves from performing their safety function.

Need for Revision of the Requirement

The current capacity of the MSIV LCS is 100 scfh. This provides adequate leakage control for the low amounts of leakage which would be expected to occur during an accident. However, should the leakage rate exceed the designed capacity of the LCS, a concern of Generic Issue C-8, no alternate pathway exists to process that leakage. In addition, the LCS at LaSalle operates with a negative pressure relative to the steamlines. It therefore induces more leakage through the MSIVs than would normally occur. Since the LCS recovers leakage from between the inboard and outboard MSIVs, it is also inconsistent with the philosophy of multiple barriers for preventing fission product release.

There are currently 24 MSIV-LCS instruments that require calibrations on monthly, 18 month, and 36 month frequencies. In all, these calibrations expend \$200,000 per year. Per Generic Letter 89-10, there are also 16 valves per unit which require motor operated valve surveillances and Votes testing. This currently costs the company \$85,000 per year. Although not quantified, these surveillances also result in personnel exposure, since the instrumentation is located within a radiologically posted area.

Besides costs associated with the MSIV LCS itself, MSIV leakage rates exceeding current Technical Specification requirements have caused outage extensions, valve refurbishments, and personnel dose accumulation. On average, 2 MSIVs fail the leak rate requirements every 5 years. This adds up to a refurbishment cost of \$150,000 per valve, dose accumulation, and outage extensions.

The valve refurbishments also contribute to repeated valve failures. Each time the seat is machined, the thickness is reduced, which may lead to earlier than necessary seat replacement. Disassembly and assembly also cause wear on the various components removed. By increasing the allowable leakage, MSIV refurbishment for minor leakages may be avoided, thereby reducing one of the root causes of repeated valve failures.

Table 3.8.3.3-1 needs to be revised to delete the MSIV LCS valves, because the MSIV LCS and associated valves are being eliminated. The remainder of Table 3.8.3.3-1 is being retained in Technical Specifications, rather than to relocate the table from Technical Specifications, in order to minimize the number of procedures that would be needed to implement the amendment upon approval.

Description of the Revised Requirement

Due to the limitations and costs described above, ComEd proposes to replace the use of the MSIV LCS for processing MSIV leakage with the main steamlines, main steamline drains, and the main condenser. Diagrams of these systems, as well as an overall diagram of the revised flowpath, are found in Attachments H and I. Because this arrangement provides a higher capacity for processing leakage than the existing LCS, this request would also change the allowable MSIV leakage from 100 scfh for all four main steam lines to 100 scfh per steam line (400 scfh for all four main steam lines).

A request for exemption of the MSIV leakages from the overall integrated leak rate test (Type A) and the combined local leak rate test (Type B and C) criteria is given in Attachment C. The requested changes to the Unit 1 and 2 Technical Specifications are included as Attachment B. However, a summary of those changes follows:

- 1) The MSIV LCS operability LCO and its associated surveillance requirements and Bases (Sections 3/4.6.1.4 and B 3/4.6.1.4) will be deleted due to the elimination of that system.
- 2) The MSIV allowable leakage rate (Sections 4.6.3.6.a and B 3/4.6.3) will be increased from 100 scfh through all four main steam lines to 100 scfh per steam line (400 scfh for all four main steam lines).

If any one main steam line exceeds the allowed leakage, the leaking MSIV will be refurbished back to less than 25 scfh prior to startup. This requirement will be administratively controlled through the station leak rate test program.

Technical Specification Table 3.8.3.3-1, Motor Operated Valves Thermal Overload Protection, item 1, MSIV LCS system valves and Bypass devices. The list of components under item 1 is proposed to be replaced with the word "Deleted" to maintain the same alphanumeric order within the table.

As part of this amendment request, a minor correction is also made to Index page XIV. This correction was erroneously left out of the amendment request pertaining to the exemption approved in Reference 3.

Bases for the Revised Requirement

A. Description of Alternate Leakage Pathway

The use of the main steamlines, main steamline drains, and the main condenser as an alternate pathway for processing MSIV leakage is

supported by work by the BWR Owner's Group (BWROG) and documented in the GE Report, "BWROG Report for Increasing MSIV Leakage Rate Limits and Elimination of Leakage Control Systems, "NEDC 31858P, Revision 2, which was submitted to the NRC by BWROG letter dated October 4, 1993. This report is listed as Reference 6.

With the deletion of the MSIV LCS, which involves cutting and capping all piping connecting the MSIV LCS to the Main Steam system, MSIV leakage will pass from the outboard MSIV, through the Main Steamlines, Main Steamline Drains and into the condenser. The large volume in the main condenser holds up fission products that escape through the MSIVs, limiting release to the environment. This alternate pathway is more reliable than the existing LCS since less equipment is employed. The alternate pathway also has a much higher capacity for processing leakage than does the MSIV LCS, with a capacity of only 100 scfh. In addition, the MSIV LCS will only operate at less than 35 psig reactor vessel steam dome pressure, whereas the alternate pathway is independent of reactor pressure.

To properly align the pathway, in addition to closing the MSIVs and the containment isolation valves, operators will close valves to isolate the leakage pathway from the auxiliary steam supplies. The operating drains will also be closed and the shutdown drains will be opened. All of the remote manually operated valves that need to be moved have Class 1E power supplies. Upon approval of this amendment, design control for all of these valves will be maintained. Appropriate changes to station procedures will be made to reflect deletion of the MSIV LCS and use of the alternate.

B. Verification of Seismic Adequacy of Alternate Pathway

The alternate pathway requires that the main steam system piping and main condenser be qualified to remain intact during a seismic event to prevent escape of the leakage should a LOCA with substantial core degradation and a seismic event coincide. The reports demonstrating seismic adequacy of these systems are included as Attachments H and I.

The Sargent & Lundy (S&L) reports evaluate design and analysis criteria for the main steam piping, condenser, and turbine building. These conclusions are summarized below. In addition, walkdowns were performed by S&L to identify any possible seismic concerns. These concerns are listed in Attachments H and I as outliers. The walkdowns were performed consistent with the Reference 6 BWROG guidelines. Qualifications for the individuals performing the walkdowns are given in Section 4 of Attachments H and I.

The S&L reports verify the ability of the turbine building to withstand seismic forces associated with the safe shutdown earthquake (SSE). The turbine building is a Class II structure that must be designed to ensure that any failures of it do not impact the structural integrity of a Class I system. The turbine buildings were designed to the Uniform Building Code of 1970, which included requirements for tornado and seismic loadings. Based on the design criteria and structural description, S&L concluded that the turbine buildings would not collapse under an SSE at LaSalle.

Specific evaluations were performed for the LaSalle condensers due to their size and weight being greater than those in the "Earthquake Experience Database" of the BWROG report (Reference 6). This evaluation utilized the EPRI methodologies of Reference 10.4 listed in Attachments H and I. S&L verified that the anchorage High Confidence of Low Probability of Failure was well within the design basis SSE value.

The main steam piping, including associated instrument and sample lines was evaluated and, with two exceptions (outliers) per unit, was shown to be rugged enough to withstand the safe shutdown earthquake. The main steamlines up to the turbine stop valves and the bypass line, the main steam drain up to the last motor operated valve before the condenser, the warm-up lines up to the structural anchors, and certain small bore instrument lines at LaSalle were originally designed to ANSI B31.1 piping standards and seismically analyzed in accordance with ASME Boiler and Pressure Vessel (B&PV) Code Section III, class 2 and 3 rules, although they were designed as non-safety-related. However, the design methods are consistent with seismic Category I qualification methods for LaSalle's safety-related piping and supports. Some small bore sensing instrument lines were not designed to ASME section III, class 2 and 3 rules, but fall well within the BWROG "Earthquake Experience Database".

Action will be taken prior to eliminating the MSIV LCS to resolve the concerns with the outliers, ensuring the entire alternate leakage path will withstand seismic forces. The process sampling line in the steam tunnel was identified as an outlier for each unit and the valves will be administratively controlled closed as a resolution. The block walls supporting three pressure sensing lines were also identified as outliers for both units and will be reinforced to ensure adequate seismic performance.

With the exceptions of the identified outliers, which will be resolved, and the main condensers, for which a separate detailed evaluation was performed, the seismic performance of the new leakage pathway is bounded by the results given in the Reference 6 BWROG topical.

The lines in the leakage path downstream of the MSIVs will receive inspections in accordance with the station's In-Service Inspection (ISI) program for ASME Section XI, Class II piping. All maintenance and modifications will be performed as for Class II piping. Drawings and documentation will be updated with the current configurations to ensure future modifications maintain acceptable seismic performance for all leakage path lines, consistent with the S&L seismic qualification walkdown.

C. Dose Consequences for Alternate Pathway

The proposed MSIV leakage pathway is consistent with the philosophy of protection by multiple barriers for limiting fission product release to the environment. Except for the requirement to establish a proper flow path from the MSIVs to the condenser, the proposed method is passive and does not require any additional logic control and interlocks.

Attachment G is a plant-specific radiological analysis, which was performed by GE to assess the effects of the proposed increase to the allowable MSIV leakage rate in terms of Main Control Room (MCR) and off-site doses following a postulated design basis LOCA. This analysis utilizes the hold-up volumes of the main steam piping and condenser as an alternate method for treating the MSIV leakage. Elevated releases, such as through offgas or the mechanical vacuum pump, are bounded by the GE dose calculation. Attachment F provides the input assumptions for the Attachment G analysis.

The results of the analysis show that the off-site and MCR doses, calculated with MSIV leakage of 100 scfh per steam line (400 scfh for all four main steam lines), remain well within the limits specified in 10CFR100 and 10CFR50, Appendix A. These dose results are also bounded by those presented in the Reference 6 BWROG topical.

These doses result from the increased MSIV leakage limit and the new MSIV leakage pathway. Table 1 shows the resulting doses when these results are added to the LOCA doses currently provided in the UFSAR. The old LOCA doses included a dose contribution from 100 scfh of MSIV leakage. The new dose contribution from 400 scfh of MSIV leakage was added to the old LOCA doses without subtracting the old 100 scfh dose contribution; therefore, this is a conservative method. The results indicate an increase in the reported LOCA doses, however, adequate margin to the specified limits is maintained.

D. MSIV LCS Motor Operated Valves

The MSIV LCS motor operated valves are being eliminated with the MSIV Leakage Control System. As a result, the safety function and the requirement for bypass of the associated thermal overload protection will be eliminated with the valves and system. Therefore, the list of MSIV LCS valves and the associated bypass devices are proposed to be deleted from Table 3.8.3.3-1 of each Unit's Technical Specifications.

Schedule Requirements

Commonwealth Edison requests that NRC review of the Technical Specification changes be completed by LaSalle Unit 1 Cycle 7 shutdown, which is scheduled to occur January 27, 1996, so that the necessary modifications can proceed with assurance that this licensing amendment is acceptable to your staff. It is requested that implementation for the individual units be upon startup from refueling after each unit's Cycle 7.

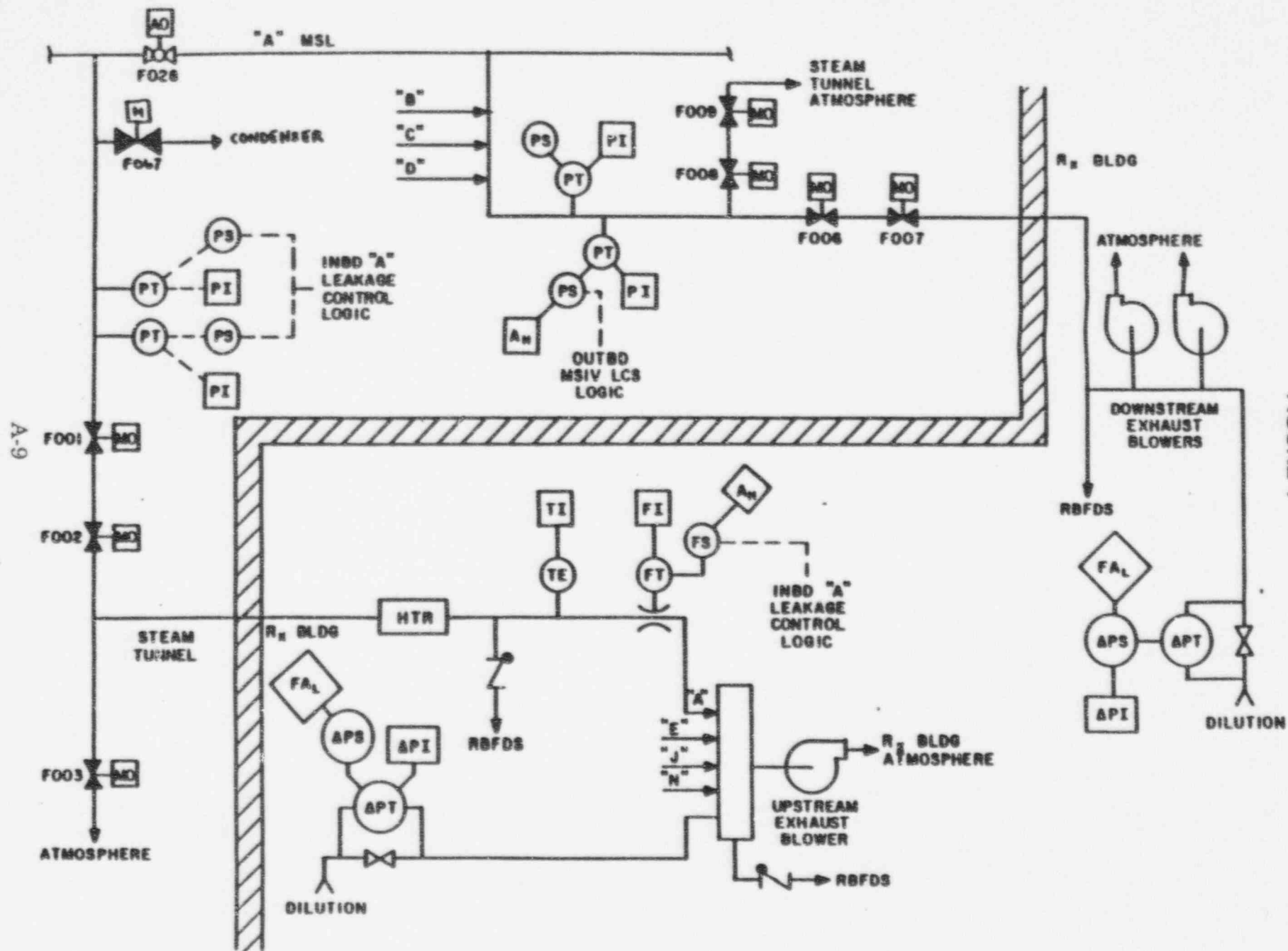


FIGURE 1

TABLE 1

**Loss-of-Coolant Accident Doses
(given in rem)**

	Previous UFSAR Containment Leakage Contribution	New GE MSIV Leakage Contribution	New Total Doses	Applicable Limit	% of Applicable Limit (New Doses)	% Margin Reduction
Radiological Effects				10CFR100		
<i>Exclusion Area (509 meters)</i>						
Whole Body Dose	0.306	0.0016	0.308	25	1.2	0.008
Inhalation (thyroid)	6.06	0.024	6.08	300	2.0	0.007
<i>Low Population Zone (6400 meters)</i>						
Whole Body Dose	0.0336	0.03	0.0636	25	0.3	0.12
Inhalation (thyroid)	2.43	8.33	10.76	300	3.6	2.8
Control Room Doses				10CFR50 Appendix A, GDC 19		
Skin (Beta)	3.4	0.81	4.21	30	14.0	2.7
Whole Body (Gamma)	0.31	0.06	0.37	5	7.4	1.2
Thyroid	10.3	3.19	13.49	30	45.0	10.6

ATTACHMENT B

PROPOSED CHANGES TO THE LICENSE/TECHNICAL SPECIFICATIONS FOR LASALLE UNITS 1 AND 2

SUMMARY OF PROPOSED CHANGES FOR LASALLE UNIT 1

License page 16	Addition of 10 CFR Appendix J exemptions
Index pg. VII	Index page revised for 3/4.6.1.4 deletion
Index pg. XIV	Index page revised for B 3/4.6.1.4 deletion and Amendment 102 (TAC No. M90702) correction eliminating reference to a previously deleted section
Section 3.6.1.4 Page 3/4 6-7	MSIV LCS Operability LCO Deleted
Section 4.6.1.4 Page 3/4 6-7	MSIV LCS Surveillance Requirements Deleted
Page 3/4 6-8	Blank Page Deleted
Section 3.6.3 Page 3/4 6-22	*Included for Information Only
Section 4.6.3.6.a Page 3/4 6-23	MSIV Allowable Leakage Rate Increased from 100 scfh through all four main steam lines to 100 scfh per steam line (400 scfh for all four main steam lines)
Table 3.8.3.3-1 Page 3/4 8-30	Delete MSIV LCS motor operated valves from the Table of Motor Operated Valves Thermal Overload Protection
Bases Section 3/4.6.1.4 Page B 3/4 6-2	MSIV LCS Bases Deleted
Bases Section 3/4.6.3 Page B 3/4 6-4a	Bases Describing 4.3.6.a Modified for Increased MSIV Allowable Leakage Rate of 100 scfh per steam line (400 scfh for all four main steam lines)

4/13/95

License No. NPF-11

Am. 102
3/16/95

D. The facility requires exemptions from certain requirements of 10 CFR Part 50, 10 CFR Part 70, and 10 CFR Part 73. These include:

- (a) Exemptions from certain requirements of Appendices G, H and J and 10 CFR Part 73 are described in the Safety Evaluation Report and Supplement No. 1, No. 2 and No. 3 to the Safety Evaluation Report.
- (b) An exemption was requested until the completion of the first refueling from the requirements of 10 CFR 70.24.
- (c) An exemption from 10 CFR Part 50, Appendix E from performing a full scale exercise within one year before issuance of an operating license, both exemptions (b) and (c) are described in Supplement No. 2 of the Safety Evaluation Report.
- (d) An exemption was requested from the requirements of 10 CFR 50.44 until either the required 100 percent rated thermal power trip startup test has been completed or the reactor has operated for 120 effective full power days as specified by the Technical Specifications. Exemption (d) is described in the safety evaluation of License Amendment No. 12.
- (e) An exemption from the requirement of paragraph III.D of Appendix J to conduct the third Type A test of each ten-year service period when the plant is shutdown for the 10-year plant inservice inspections. Exemption (e) is described in the safety evaluation accompanying amendment No. 102 to this License. these exemptions are authorized by law and will not endanger life or property or the common defense and security and are otherwise in the public interest. Therefore, these exemptions are hereby granted. The facility will operate, to the extent authorized herein, in conformity with the application, as amended, and the rules and regulations of the Commission (except as hereinafter exempted therefrom), and the provisions of the Act.

INSERT A →

INSERT A

- (f) An exemption was granted to remove the Main Steam Isolation Valves (MSIVs) from the acceptance criteria for the overall integrated leak rate test (Type A), as defined in the regulations of 10CFR50, Appendix J, Paragraphs III.A.5(b)(1) and III.A.5(b)(2). Exemption (f) is described in the safety evaluation accompanying amendment No. (the no. of this proposed amendment) to this License.
- (g) An exemption was granted to remove the Main Steam Isolation Valves (MSIVs) from the acceptance criteria for the combined local leak rate test (Type B and C), as defined in the regulations of 10CFR50, Appendix J, Paragraph III.C.3. Exemption (g) is described in the safety evaluation accompanying amendment No. (the no. of this proposed amendment) to this License.

These exemptions are authorized by law and will not endanger life or property or the common defense and security and are otherwise in the public interest. Therefore, these exemptions are hereby granted. The facility will operate, to the extent authorized herein, in conformity with the application, as amended, and the rules and regulations of the Commission (except as hereinafter exempted therefrom), and the provisions of the Act.