



Commonwealth Edison  
1400 Opus Place  
Downers Grove, Illinois 60515

June 17, 1992

Dr. Thomas E. Murley, Director  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Attn: Document Control Desk

Subject: LaSalle Units 1 and 2  
Application for Amendment to Facility Operating  
Licenses NPF-11 and NPF-18  
Attachment A, Technical Specifications  
Removal of Table 3.8.3.2-1  
NRC Docket Nos. 50-373 and 50-374

In accordance with 10CFR50.90, Commonwealth Edison (CECo) proposes to amend Appendix A, Technical Specifications, of Facility Operating Licenses NPF-11 and NPF-18. The proposed amendments request deletion of Table 3.8.3.2-1 to address planned modifications to plant breakers.

This proposed amendment request is subdivided as follows:

- Attachment A provides a description and evaluation of the proposed changes.
- Attachment B provides the marked-up Technical Specification pages with the requested changes indicated.
- Attachment C describes CECO's evaluation performed in accordance with 10CFR50.92(c), which confirms that No Significant Hazards Consideration is involved.
- Attachment D provides the Environmental Assessment.

This proposed amendment has been reviewed and approved by both CECO On-Site and Off-Site Review in accordance with Commonwealth Edison procedures.

CECo requests a timely staff review of this amendment request to support breaker replacement during the Unit 1 fifth refueling outage, (L1R05), scheduled to start September 26, 1992. CECO further requests that both Unit's amendments be made effective upon startup from the L1R05 refuel outage.

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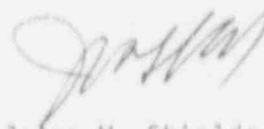
June 17, 1992

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 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.

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 amendment request to this office.

Respectfully,

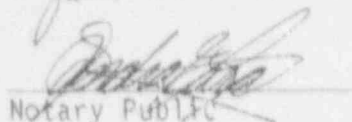


JoAnn M. Shields  
Nuclear Licensing Administrator

- Attachments:
- A. Description and Evaluation of the Proposed Changes
  - B. Marked-Up Technical Specification Pages
  - C. Evaluation of Significant Hazards Consideration
  - D. Environmental Assessment

cc: A.B. Davis, Regional Administrator - RIII  
D.L. Hills, Senior Resident Inspector - LSCS  
B.L. Siegel, Project Manager - NRR  
Office of Nuclear Facility Safety - IDNS

Subscribed and Sworn  
before me this 17th day  
of June, 1992

  
Notary Public

## ATTACHMENT A

### Description and Evaluation of Proposed Changes to Appendix A Technical Specifications of Facility Operating Licenses NPF-11 and NPF-18

#### DESCRIPTION OF THE PROPOSED CHANGE

LaSalle County Station is scheduled to begin the Unit 1 fifth refuel outage, L1R05, on September 26, 1992. In accordance with commitments made in response to Generic Letter 89-10 Supplement 3, during L1R05 the valve actuator for the Reactor Core Isolation Cooling (RCIC) Steam Supply Inboard Isolation valve, 1E51-FO63, is being replaced with an actuator with a larger motor. The corresponding valve in the LaSalle Unit 2 RCIC system will require the same actuator replacement during the next Unit 2 Refuel outage, L2R05, scheduled for September 1993.

During the design stage for the actuator modifications, it was verified that the larger motors for each of the new actuators would require larger breakers for electrical power supply. Adequate breakers were found on each of the original Motor Control Centers (MCC); however, the breaker compartment numbers will change. Technical Specification Table 3.8.3.2-1, page 3/4 8-25, for each Unit lists these inboard isolation valves, including the MCC and original compartment number.

Therefore, a change is required to both the Unit 1 and 2 Technical Specifications. Rather than changing the Technical Specification Tables containing component lists to reflect minor changes such as this, LaSalle proposes that Table 3.8.3.2-1 be deleted from both Unit 1 and 2 Technical Specifications.

Generic Letter 91-08, Removal of Component Lists from Technical Specifications, provides guidance for removing this component list. In order for the component lists to be removed, the associated Limiting Condition for Operation must be revised to explicitly describe those components to which the Technical Specification applies. According to Generic Letter 91-08, this provides an acceptable alternative to identifying components by their LaSalle equipment identification numbers as they are currently listed in tables of Technical Specification components. LaSalle Technical Specification 3.8.3.2 Limiting Condition for Operation (LCO), Action statement, and Surveillance Requirement 4.8.3.2 are being revised to describe those components to which the Technical Specification applies without reference to a specific list of the components.

#### DESCRIPTION OF THE CURRENT REQUIREMENT

The Technical Specification currently states:

"3.8.3.2 All primary containment penetration conductor overcurrent protective devices shown in Table 3.8.3.2-1 shall be OPERABLE.

## ATTACHMENT A (continued)

### ACTION:

With one or more of the primary containment penetration conductor overcurrent protective devices shown in Table 3.8.3.2-1 inoperable, ...

### SURVEILLANCE REQUIREMENTS

4.8.3.2 Each of the primary containment penetration conductor overcurrent protective devices shown in Table 3.8.3.2-1 shall be demonstrated OPERABLE: ..."

### BASES FOR THE CURRENT REQUIREMENT

The LaSalle Technical Specification Bases state that specification 3/4.8.3 applies to primary containment medium and high voltage (6.9 kV, 4.16 kV and 480 volt) electrical penetrations and penetration conductors. These voltages are reflected in Surveillance Requirement 4.8.3.2.a and the equipment listed in Table 3.8.3.2-1.

### DESCRIPTION OF PROPOSED REQUIREMENTS

CECo proposed that the Technical Specification be amended as follows:

"3.8.3.2 Primary and backup primary containment penetration conductor overcurrent protective devices associated with each primary containment medium and high voltage (6.9 kV, 4.16 kV and 480 volt) electrical penetration circuit shall be OPERABLE. The scope of these protective devices excludes those circuits for which credible fault currents would not exceed the electrical penetration design rating.

### ACTION:

a. With one or more of the primary containment penetration conductor overcurrent protective device(s) inoperable, ...

### SURVEILLANCE REQUIREMENTS

4.8.3.2 Each of the primary containment penetration conductor overcurrent protective devices shall be demonstrated OPERABLE:..."

In order to provide a reference to the new location of the list of components being removed, the Technical Specification Bases section 3/4 8.3 is being revised to include the following statement:

"A controlled list of the components applicable to Specification 3.8.3.2 is maintained as an Administrative Technical Requirement."

## ATTACHMENT A (continued)

### BASES FOR PROPOSED REQUIREMENTS

The voltages specified in the Bases, (6.9 kV, 4.16 kV and 480 volt), are included in the proposed Technical Specification LCOs, which adequately describe the components that are currently in the table. No additional components would need to be added to reflect this proposed wording. The difference in wording between the proposed LaSalle Technical Specification LCO and the Generic Letter is due to the difference in the approved scope of the LaSalle Technical Specification LCO.

To provide control of this component list and other requirements of this nature that are removed from Technical Specifications but still require administrative control, LaSalle has initiated an Administrative Procedure, "Administrative Technical Requirements." This procedure will provide the guidelines for development, control, and use of the Administrative Technical Requirements (ATR's). The ATR's will receive the same level of attention as the Technical Specifications, and must be complied with at all times (based on applicable plant (unit) conditions). Any changes to ATR's, whether new or revised, will be reviewed and approved by the Onsite Review and Investigative Function, using the 10CFR50.59 change process. The context of Technical Specification Table 3.8.3.2-1 will be contained in an ATR, which will refer to Technical Specification 3.8.3.2 to assure compliance with Technical Specifications for the components required to be OPERABLE by LCO 3.8.3.2. Approved ATR's will be issued to each holder of official copies of Technical Specifications, so that ATR's are readily accessible for reference and use. In addition to controlling the component list as an ATR, the UFSAR will be revised to incorporate this information at the next update following approval of this Technical Specification amendment request.

In summary, Table 3.8.3.2-1 may be removed from the Technical Specifications with assurance that all primary containment electrical penetration conductors which are required to have both normal and backup fault protection will continue to be controlled to assure continued operability as required by Technical Specification 3.8.3.2.

### SCHEDULAR REQUIREMENTS

CECo requests that both Unit's amendments be made effective upon startup from the L1R05 refuel outage.