



Commonwealth Edison
1400 Opus Place
Downers Grove, Illinois 60515

September 16, 1992

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

Attn: Document Control Desk

Subject: LaSalle County Station Units 1 and 2
Response to Request for Additional Information on the Amendment
Application under Generic Letter 87-09
NRC Docket Nos. 50-373 and 50-374

Reference: See Attachment A

Dear Dr. Murley:

The NRC has been working in conjunction with the Atomic Industrial Forum (AIF) on a program for technical specification improvements. As part of this program the NRC has issued Generic Letter 87-09, Sections 3.0 and 4.0 of the Standard Technical Specifications (STS) on the Applicability of Limiting Conditions for Operation and Surveillance Requirements. The generic letter addresses three specific problems that have been encountered with Sections 3.0 and 4.0 of the standard technical specifications (STS). The recommendations contained in the Generic Letter for improvements to the technical specifications were incorporated into the reference (a) submittal. In reference (b), the NRC requested the following:

- affirmation that remedial measures prescribed by the technical specification action statements for which exceptions to Specification 3.0.4 will be granted under Generic Letter 87-09 provide a sufficient level of protection to permit operational mode changes and safe long term operation consistent with the UFSAR and its supporting safety analyses.
- identification of and affirmation that procedures, management directives, onsite safety reviews, etc. have been established to limit the use of the Specification 3.0.4 exceptions.
- affirmation that training necessary for ensuring that plant operators are made aware of, and are instructed to exercise, the controls promulgated in limiting the use of such exceptions have been developed.

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An evaluation was performed of the remedial measures prescribed by technical specification action statements for which the exception will be granted, to ensure that a sufficient level of protection existed to allow continued operation and mode changes. To aid in this review, all of the technical specification action statements were categorized and evaluated by group. This evaluation determined that all of the action statements for which an exception to 3.0.4 will be granted provide a sufficient level of protection to permit operational mode changes and safe long term operation consistent with licensing basis described in the UFSAR. As Generic Letter 87-09 states that it was not the intent of the NRC Staff to place additional restraints on unit operation as a result of the recommendations contained in the generic letter, for all specification action statements for which "3.0.4 Not Applicable" statements currently exist, 3.0.4 will remain Not Applicable whether or not the specific statement is removed by this amendment. The results of this evaluation will be retained at LaSalle County Station.

Station administrative procedures will be revised to provide guidance for the application of Technical Specification 3.0.4 Exemptions. This guidance will stress the importance of maintaining equipment operability, the importance of focusing attention on overall plant safety and potential system interactions, and that in cases where a technical specification does not prohibit a change in operational conditions, it will be the exception when a startup proceeds with important safety features inoperable.

Administrative controls will be established for Technical Specification 3.0.4 Exemptions, including the level of authority required to approve such exemptions. In addition, the licensed operator training program will include training on the above procedure revisions and administrative controls.

The original No Significant Hazards Consideration Determination was reviewed with respect to this letter, and found to acceptably address the additional administrative changes.

Also included with this letter are the following:

Attachment A, which lists references contained in this letter.

Attachment B, which contains corrections to the original submittal.

Attachment C, which requests additional editorial and typographical changes.

Attachment D, which provides a reference to other technical specification amendments whose pages may be affected by this amendment.

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Attachment E, which contains the marked-up technical specification pages.

Please note that several Technical Specification changes have been approved, and others requested, since the original 3.0/4.0 amendment request was submitted. This letter references the Technical Specification sections and pages as if they had remained unchanged. Where necessary for clarity, information regarding these changes has been discussed in the appropriate attachment. It is requested that the most current revision of each page be used in creating the updated version of the page as a result of this amendment request.

If there are any questions, please direct them to this office.

Respectfully,



JoAnn Shields
Nuclear Licensing Administrator

Attachments

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

ATTACHMENT A

References

- (a) W.E. Morgan (CECo) letter to Dr. T.E. Murley (USNRC), dated December 15, 1989; Application for Amendment to Facility Operating License NPF-11 and NPF-18: Clarification of General Requirements for Application to Technical Specification LCOs and Surveillance Requirements
- (b) R.M. Pulsifer (USNRC) letter to T.J. Kovach (CECo), dated February 27, 1990; Request for Additional Information on the Licensee Amendment Application under Generic Letter 87-09 for LaSalle County Station Units 1 and 2
- (c) B.L. Siegel letter to T.J. Kovach, dated November 27, 1991; Approving Amendments 81 (Unit 1) and 65 (Unit 2); HPCS/RCIC.
- (d) P.C. Shemanski letter to T.J. Kovach, dated July 19, 1989; Approving Amendments 68 (Unit 1) and 50 (Unit 2); Revision to 4.0.2
- (e) W.R. Butler letter to D.L. Farrar, dated May 22, 1985; Approving Amendments 23 (Unit 1) and 11 (Unit 2); Administrative Changes.
- (f) B.L. Siegel letter to T.J. Kovach, dated September 1, 1992; Approving Amendments 85 (Unit 1) and 69 (Unit 2); Radiological Environmental Technical Specifications.
- (g) P.L. Piet letter to USNRC, dated April 2, 1991; Application for Amendment to Delete Rod Sequence Control System and Lower Rod Worth Minimizer Setpoint.
- (h) J.M. Shields letter to Dr. T.E. Murley, dated June 17, 1992; Application for Amendment to Remove Table 3.8.3.2-1.
- (i) W.D. Shafer (NRC) letter to C. Reed, dated February 6, 1990; transmitting Inspection Report 50-373/89026 and 50-374/89025.
- (j) W.E. Morgan (CECo) letter to Dr. T.E. Murley, dated January 8, 1990; Correction to Amendment 26 to Facility Operating License NPF-11.
- (k) P.C. Shemanski (USNRC) letter to T.J. Kovach, dated January 12, 1990; Correction to Amendment 26 to Facility Operating License NPF-11.

Attachment B

Corrections to the Original Submittal

(Marked-up versions of these pages may be found in Attachment E.)

The original submittal contained Technical Specification 3.3.7.11, page 3/4 3-86, for both Unit 1 and Unit 2, and requested deletion of exemption from both 3.0.3 and 3.0.4. This Limiting Condition for Operation will prevent a startup following a unit outage if certain of the required instrumentation is inoperable, even though the action statement provides for continued operation if alternative monitoring capability, such as periodic grab samples, etc. is satisfied. Therefore, as allowed by Generic Letter 87-09, CECO requests to retain the exemption from Specifications 3.0.3 and 3.0.4. Corrected versions of these pages are included in Attachment E, and replace the pages in the original submittal.

The original submittal contained Technical Specification 3.6.1.3, page 3/4 6-5, for both Unit 1 and Unit 2, and requested deletion of exemption from 3.0.4. This Limiting Condition for Operation will prevent a startup following a unit outage if one primary containment air lock door is inoperable, even though the action statement provides for continued operation if the surveillance requirements are met. Therefore, as allowed by Generic Letter 87-09, CECO requests to retain the exemption from Specification 3.0.4. Corrected versions of these pages are included in Attachment E, and replace the pages in the original submittal.

The Generic Letter 89-09 wording to replace the existing Technical Specification 3.0.4, for both Unit 1 and Unit 2, was included in the original submittal as Insert A. In the second sentence of Insert A, a clause was erroneously omitted. The sentence should state "Entry into an OPERATIONAL CONDITION or specified condition may be made in accordance with ACTION requirements when conformance to them permits continued operation of the facility for an unlimited period of time." Also, in the third sentence the word "through" is misspelled. Please make these corrections in the final version of the appropriate pages for both Units 1 and 2.

ATTACHMENT C

Additional Editorial and Typographical Changes

(Marked-up versions of these pages may be found in Attachment E.)

Unit 1

Page	Description of Change Requested
3/4 3-1	LCO 3.3.1 action b: delete the extra "the" from the beginning of this sentence. SR 4.3.1.1: Add a hyphen to the Table number, so that it states Table 4.3.1.1-1. SR 4.3.1.2: Delete the triple asterisks here, and at the bottom of the page. This footnote waived certain surveillance requirements during Unit 1 Cycle 1, and as such, no longer applies.
3/4 3-2	LCO 3.3.2 action b: The original submittal stated "...place the operable channel(s) and/or trip system in the tripped condition* within one hour." and has been corrected to state "...place the inoperable channel(s) and/or trip system in the tripped condition* within one hour." Reference (i) describes the situation under which the typographical error was discovered. Reference (j) documents a telephone conversation concerning the error, and Reference (k) provided the corrected page.
3/4 3-27	ACTION 30 a: delete the asterisk, as the footnote to which it refers is being deleted ACTION 36: This action was deleted in Amendment 81. See reference (c).
3/4 3-86	This correction was discussed in Attachment B.
3/4 3-91	LCO 3.3.7.12 action b: The original submittal erroneously deleted exemption from Specification 3.0.3. Only exemption from Specification 3.0.4 is being deleted.
3/4 4-1b	Delete this whole page.
3/4 4-10	LCO 3.4.4 action c.2: The word "exceeded" in the second line is redundant, and may be eliminated without changing the meaning of the required action.
3/4 6-5	This correction was discussed in Attachment B.
3/4 6-22	LCO 3.6.3 action b.1: Delete the final "s" in the word "Specifications". Footnote: Correct the spelling of the word "satisfy".

ATTACHMENT C
(Continued)

Additional Editorial and Typographical Changes

(Marked-up versions of these pages may be found in Attachment E.)

- 3/4 7-17 LCO 3.7.5.3: Realign the last half of the sentence.
- APPLICABILITY: The number "2" in the chemical formula for carbon dioxide should be a subscript, and there should be a space between the number "2" and the following word.
- LCO 3.7.5.3 action b: The word "and" should be deleted.
- 3/4 8-26 LCO 3.8.3.3: Table 3.8.4.2-1 does not exist in the LaSalle Specification. The correct table reference is Table 3.8.3.3-1.
- 3/4 8-27 Table Title: Insert a hyphen in the table number so that it states Table 3.8.3.3-1.
- 3/4 8-28 Table Title: Insert a hyphen in the table number so that it states Table 3.8.3.3-1.
- Item j: Delete all the asterisks from this column and delete the footnote. This footnote waived certain surveillance requirements during Unit 1 Cycle 1, and as such, no longer applies.
- 3/4 8-29 Table Title: Insert a hyphen in the table number so that it states Table 3.8.3.3-1.
- Item j: Delete all the asterisks from this column and delete the footnote. This footnote waived certain surveillance requirements during Unit 1 Cycle 1, and as such, no longer applies.

Unit 2

<u>Page</u>	<u>Description of Change Requested</u>
3/4 0-2	Footnote: This footnote should have been deleted in Amendment 50. It waived certain surveillance requirement during Unit 2 Cycle 2, and as such, no longer applies. See reference (d).
3/4 3-1	LCO 3.3.1 action b: delete the extra "the" from the beginning of this sentence.
3/4 3-27	ACTION 36: This action was deleted in Amendment 65. See reference (c).
3/4 3-81	LCO 3.3.7.10 action c: Reference to 6.6.B.2.b should have been deleted in Amendment 11. See Reference (e).

ATTACHMENT C
(Continued)

Additional Editorial and Typographical Changes

(Marked-up versions of these pages may be found in Attachment E.)

- 3/4 3-86 This correction was discussed in Attachment B.
- 3/4 3-91 LCO 3.3.7.12 action b: The original submittal erroneously deleted exemption from Specification 3.0.3. Only exemption from Specification 3.0.4 is being deleted.
- 3/4 4-2a Delete this whole page.
- 3/4 4-11 LCO 3.4.4 action c.2: The word "exceeded" in the second line is redundant, and may be eliminated without changing the meaning of the required action.
- 3/4 6-5 This correction was discussed in Attachment B.
- 3/4 6-25 LCO 3.6.3 action b.1: Delete the final "s" in the word "Specifications".
- Footnote: Correct the spelling of the word "satisfy".
- 3/4 8-26 LCO 3.8.3.3: Table 3.8.4.2-1 does not exist in the LaSalle Specification. The correct table reference is Table 3.8.3.3-1.

ATTACHMENT D

Reference to other Amendments

The marked-up pages supporting this amendment have been, or will be affected by other Technical Specification amendments. These interactions are discussed below.

Unit 1 Amendment 85 and Unit 2 Amendment 69
Generic Letter 89-01
Radiological Effluent Technical Specifications (RETS)
See Reference (f)

LCO 3.3.7.10 is referred to be on page 3/4 3-81 in this submittal. Due to RETS, this page has been deleted.

LCO 3.3.7.11, on page 3/4 3-86 in the original submittal, has changed title, and has had this title change carried throughout the specification. This LCO is now located on page 3/4 3-82.

LCO 3.3.7.12 is referred to be on page 3/4 3-91 in this submittal. Due to RETS, this page is now 3/4 3-85.

LCO 3.11.1.2 is referred to be on page 3/4 11-6 in this submittal. Due to RETS, this page has been deleted.

LCO 3.11.1.3 is referred to be on page 3/4 11-7 in this submittal. Due to RETS, this page has been deleted.

LCO 3.11.1.4 is referred to be on page 3/4 11-8 in this submittal. Due to RETS, this page is now 3/4 11-1.

LCO 3.11.2.2 is referred to be on page 3/4 11-13 in this submittal. Due to RETS, this page has been deleted.

LCO 3.11.2.3 is referred to be on page 3/4 11-14 in this submittal. Due to RETS, this page has been deleted.

LCO 3.11.2.4 is referred to be on page 3/4 11-15 in this submittal. Due to RETS, this page has been deleted.

LCO 3.11.2.5 is referred to be on page 3/4 11-16 in this submittal. Due to RETS, this page has been deleted.

LCO 3.11.2.6 is referred to be on page 3/4 11-16 in this submittal. Due to RETS, this page has been renumbered, and is now page 3/4 11-2.

ATTACHMENT D
(Continued)

Reference to other Amendments

LCO 3.11.2.8 is referred to be on page 3/4 11-19 in this submittal. Due to RETS, this page has been deleted.

LCO 3.11.3 is referred to be on page 3/4 11-20 in this submittal. Due to RETS, this page has been deleted.

LCO 3.11.4 is referred to be on page 3/4 11-22 in this submittal. Due to RETS, this page has been deleted.

LCO 3.12.1 is referred to be on page 3/4 12-1 in this submittal. Due to RETS, this page has been deleted.

LCO 3.12.2 is referred to be on page 3/4 12-9 in this submittal. Due to RETS, this page has been deleted.

LCO 3.12.3 is referred to be on page 3/4 12-10 in this submittal. Due to RETS, this page has been deleted.

Application For Amendment
Deletion of Rod Sequence Control System
and
Lowering of Rod Worth Minimizer Setpoint
Submitted April 2, 1991
See Reference (g)

LCO 3.1.3.1 is referred to be on page 3/4 1-4 in this submittal. Due to RSCS, this page is being deleted.

LCO 3.1.3.6 is referred to be on page 3/4 1-11 in this submittal. Due to RSCS, this page is being deleted.

LCO 3.1.4.1 is referred to be on page 3/4 1-16 in this submittal. Due to RSCS, this page is being deleted.

Application for Amendment
Removal of Table 3.8.3.2-1
Submitted June 17, 1992
See Reference (h)

LCO 3.8.3.2, on page 3/4 8-22, deletes reference to the Table number.

Attachment E

Marked-up Pages

NPF-11

3/4 3-1
3/4 3-9
3/4 3-27

3/4 3-86
3/4 3-91
3/4 4-1b
3/4 4-10
3/4 6-5
3/4 6-22
3/4 7-17
3/4 8-26
3/4 8-27
3/4 8-28
3/4 8-29

NPF-18

3/4 0-2
3/4 3-1

3/4 3-27
3/4 3-81
3/4 3-86
3/4 3-91
3/4 4-2a
3/4 4-11
3/4 6-5
3/4 6-25

3/4 8-26