Commonwealth Edison Company
LaSalle Generating Station
2601 North 21st Road
Marseilles, IL 61341-9757
Tel 815-357-6761

ComEd

October 31, 1996

United States Nuclear Regulatory Commission
Attention: 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, Elimination of Seismic Monitoring Instrumentation Requirements
NRC Docket Nos. 50-373 and 50-374

Pursuant to 10 CFR 50.90, ComEd proposes to revise Appendix A, Technical Specifications of Facility Operating Licenses NPF-11 and NPF-18, LaSalle County Station Units 1 and 2. The proposed amendment includes changes to the Technical Specifications (TS) to eliminate seismic monitoring instrumentation requirements. The TS affected are TS 3/4.3.7.2, "Seismic Monitoring Instrumentation", Table 3.3.7.2-1, "Seismic Monitoring Instrumentation", Table 4.3.7.2-1, "Seismic Monitoring Instrumentation Surveillance Requirements", and Bases Section 3/4.3.7.2, "Seismic Monitoring Instrumentation". The proposed changes are supported by NRC Generic Letter 95-10, "Relocation of Selected Technical Specifications Requirements Related to Instrumentation."

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 the marked-up License/Technical Specifications pages for LaSalle Units 1 and 2 with the requested changes indicated.

3. Attachment C describes ComEd's evaluation performed in accordance with 10 CFR 50.92 (c), which confirms that no significant hazard consideration is involved.

A001 1/1

4. Attachment D provides an Environmental Assessment Applicability Review per 10 CFR 51.21.

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

ComEd requests NRC approval of this amendment request within approximately six months. There are no specific schedule requirements associated with this amendment proposal prior to February of 1997.

ComEd 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.

If there are any further questions or comments concerning this submittal, please refer them to JoEllen Burns at (815) 357-6761, extension 2383.

Respectfully,

W. T. Subalusky
Site Vice President
LaSalle County Station

Enclosure

cc: A. B. Beach, NRC Region III Administrator
M. P. Huber, NRC Senior Resident Inspector - LaSalle
D. M. Skay, Project Manager - NRR - LaSalle
F. Niziolek, Office of Nuclear Facility Safety - IDNS
DCD - Licensing (Hardcopy: Electronic:)
Central File

STATE OF ILLINOIS)

COUNTY OF LASALLE)

Docket Nos. 50-373
50-374

IN THE MATTER OF)

COMMONWEALTH EDISON COMPANY)

LASALLE COUNTY STATION - UNITS 1 & 2)

AFFIDAVIT

I affirm that the content of this transmittal is true and correct to the best of my knowledge, information and belief.

William T. Subalusky
Site Vice President
LaSalle County Station

OFFICIAL SEAL
JAMES W. GIESEKER
NOTARY PUBLIC, STATE OF ILLINOIS
MY COMMISSION EXPIRES 8-12-2000

Subscribed and sworn to before me, a Notary Public in and for the State and County above named, this 31 day of OCTOBER, 1996. My Commission expires on AUGUST 12, ~~19~~ 2000.

James W. Gieseker
Notary Public

ATTACHMENT A
DESCRIPTION OF SAFETY ANALYSIS OF THE PROPOSED CHANGES

Description of the Proposed Change

This is a proposed change to Technical Specification 3/4.3.7.2, "Seismic Monitoring Instrumentation", Table 3.3.7.2-1, "Seismic Monitoring Instrumentation", Table 4.3.7.2-1, "Seismic Monitoring Instrumentation Surveillance Requirements", and Bases Section 3/4.3.7.2, "Seismic Monitoring Instrumentation". ComEd proposes to relocate these Technical Specification requirements to licensee-controlled documents as discussed in Nuclear Regulatory Commission (NRC) Generic Letter 95-10, "Relocation of Selected Technical Specifications Requirements Related to Instrumentation." The requirements for seismic monitoring instrumentation, including a list of the components, will be included in the UFSAR and will be added to the Administrative Technical Requirements.

The proposed relocation of the Seismic Monitoring Instrumentation requirements from the Technical Specifications was initially planned to be performed in conjunction with the Improved Technical Specifications (ITS). However, the ITS is not expected to be submitted to the NRC for approval until late October, 1996. Implementation of ITS is not anticipated prior to late 1997 or early 1998. This proposed change to the Technical Specifications is desired prior to the implementation of ITS to support Modification M01-1-9400128. This modification will replace existing seismic monitoring instrumentation in Panel 0PA11J with new instrumentation which are not "like-for-like" replacements. These instrument replacements will directly impact the contents of Tables 3.3.7.2-1 and 4.3.7.2-1, which contain descriptions of the instruments as described below.

Modification M01-1-9400128 is required because spare parts for the existing seismic monitor instrumentation are no longer available and because the existing instruments have a history of spurious failures, especially during thunderstorms. This modification is being performed to improve system reliability and to prevent an extended period of system non-availability due to lack of spare parts in the event of an instrument failure.

The installation of new seismic monitor instrumentation will enhance the performance of the system by reducing susceptibility to spurious trips which have been experienced in the past, particularly during thunderstorm activity. The function of the seismic monitoring instrumentation will remain unchanged by this modification. There will be no change to alarm / annuciator setpoints. There will be no change to system operation apparent to operators in the Main Control Room. The replacement seismic monitoring instrumentation will meet or exceed the specifications of the existing instrumentation. The replacement instrumentation uses newer technology with

improved sensitivity, improved accuracy, and wider measurement ranges. The new instrumentation will have an uninterruptible power supply, the existing instrumentation does not. The new instrumentation will store data electronically and display it by means of a computer and a printer for selected output. The existing instrumentation uses tape recorders and strip chart recorders for recording, playback, and display.

Modification M01-1-9400128 will replace existing seismic monitor instrumentation in Panel 0PA11J (except for the SWP-300 annunciator panel) with new instrumentation. Existing seismic monitor instrumentation that is being removed from Panel 0PA11J includes the following instruments: the SMR-102 playback unit, the DCA-300 digital cassette accelerograph, the RSA-50 response spectrum analyzer, and the CPS-117 power supply. Replacement seismic monitor instrumentation that is being installed in Panel 0PA11J includes the following instruments: the GNC-CR12 central recorder seismic data acquisition system, the UPS (uninterruptible power supply), the computer, and the printer. The existing SWP-300 annunciator instrument will remain installed. In addition, four field mounted SSA-302 triaxial accelerometers and their enclosures will be replaced with newer Model SSA-320 accelerometers mounted inside new stainless steel NEMA 4X weatherproof enclosures in the same locations. The existing field mounted SP-215 seismic trigger and switch will remain installed. This change will involve internal wiring changes to Panel 0PA11J to accommodate the new instrumentation. This change will involve internal wiring changes for the four new field mounted SSA-320 triaxial accelerometers. The existing field cables will be utilized for the new accelerometers. No new cable pulls will be required to support this modification.

Existing Panel 0PA11J will remain in place. A seismic evaluation has been performed to document the ability of the replacement instruments to withstand a seismic event and the ability of Panel 0PA11J with the new instrumentation installed to withstand a seismic event.

ATTACHMENT A
DESCRIPTION OF SAFETY ANALYSIS OF THE PROPOSED CHANGES

Description of the Current Operating License/Technical Specification Requirement

Technical Specification 3.3.7.2, Limiting Condition for Operation, Requires the seismic monitoring instrumentation shown in Table 3.3.7.2-1 to be operable at all times. With one or more seismic monitor instruments inoperable for more than 30 days, a Special Report is required to be submitted to the NRC within the next 10 days outlining the cause of the malfunction and the plans for restoring the instruments to operable status. Therefore, plant operability is not directly impacted by inoperable seismic monitoring instrumentation.

The surveillance requirements for the seismic monitoring instrumentation are specified in Technical Specifications 4.3.7.2.1 and 4.3.7.2.2. Technical Specification 4.3.7.2.1 requires that each instrument be demonstrated operable by the performance of a channel check, channel functional test, and channel calibration surveillance tests at the frequencies shown in Table 4.3.7.2-1. Technical Specification 4.3.7.2.2 requires that any seismic monitoring instrument actuated during a seismic event greater than or equal to 0.02g shall be restored to operable status within 24 hours and a channel calibration performed within 5 days following the seismic event. Data shall be retrieved from actuated instruments and analyzed to determine the magnitude of the vibratory ground motion. A Special Report shall be prepared and submitted to the NRC within 10 days describing the magnitude, frequency spectrum, and resultant effect upon unit features important to safety.

Bases for the Current Requirement

Technical Specification Bases Section 3/4.3.7.2 states, "The operability of the seismic monitoring instrumentation ensures that sufficient capability is available to promptly determine the magnitude of a seismic event and evaluate the response of those features important to safety. This capability is required to permit comparison of the measured response to that used in the design basis for the unit. This instrumentation is consistent with the recommendations of Regulatory Guide 1.12, "Instrumentation for Earthquakes", April 1974."

ATTACHMENT A
DESCRIPTION OF SAFETY ANALYSIS OF THE PROPOSED CHANGES

Description of the Need for Amending the Technical Specification

The existing time-history accelerographs (accelerometers) are being replaced with newer models, as described above. The new models have a wider frequency range than the existing models. This will affect the "Measurement Range" column of Table 3.3.7.2-1. Item 4a of Tables 3.3.7.2-1 and 4.3.7.2-1, "Terra Technology Digital Cassette with playback feature", is being removed from Panel 0PA11J. Therefore, Tables 3.3.7.2-1 and 4.3.7.2-1, in their present form, will not accurately represent the seismic monitoring instrumentation as replaced by Modification M01-1-9400128.

Description of the Amended Technical Specification Requirement

Technical Specification 3/4.3.7.2, including Tables 3.3.7.2-1 and 4.3.7.2-1, and Bases Section 3/4.3.7.2, will be relocated from the Technical Specifications to the UFSAR and Administrative Technical Requirements (ATR). The surveillance requirements will be described in the UFSAR in section 3.7.4 and a list of the seismic monitoring instruments will be added to the UFSAR as Table 3.7-11. The Limiting Condition for Operation (LCO) requirement specified in Section 3.3.7.2.a (to prepare and submit a Special Report to the NRC within 10 days of the seismic monitoring instrumentation being inoperable for more than 30 days) will not be included in the ATR. The ATR tables will be revised when the seismic monitoring instrumentation is replaced by Modification M01-1-9400128, under 10CFR50.59, after approval of this request for amendment.

Bases Section 3/4.3.7.2 is currently titled in error as Section '3.4.3.7.2' in both the Unit 1 and Unit 2 Technical Specifications. An administrative change will be made to correct this error and this section will be indicated as 'Deleted' in the amendment.

Bases for the Amended Technical Specification Request

NRC Generic Letter 95-10 lists four criteria developed by the NRC to determine which of the design conditions and associated surveillances should be located in the Technical Specifications as limiting conditions for operation. Generic Letter 95-10 states, "The Commission's Final Policy Statement and documentation related to the

revision of 10 CFR 50.36 acknowledged that implementation of these criteria may cause some requirements presently in Technical Specifications to be moved out of existing Technical Specifications to documents and programs controlled by licensees." The seismic monitoring instrumentation was among the candidates listed for relocation to licensee-controlled documents.

The Seismic Monitoring Instrumentation provides information only and is not considered in any design basis accident or transient. It does provide information regarding seismic activity during a seismic event. However, the evaluation summarized in NEDO-31466 determined the loss of this instrumentation to be a non-significant risk contributor to core damage frequency and offsite release. Therefore, the requirements specified in current Specification 3/4.3.7.2, Table 3.3.7.2-1, Table 4.3.7.2-1, and Bases Section 3/4.3.7.2 did not satisfy the NRC Policy Statement Technical Specification Criteria to the LaSalle Technical Specifications and will be relocated to plant documents controlled in accordance with 10 CFR 50.59.

The LCO requirement specified in Section 3.3.7.2.a (to prepare and submit a Special Report to the NRC within 10 days of the seismic monitoring instrumentation being inoperable for more than 30 days) is not required to be relocated to the ATR since the Technical Specification Special Report requirements are only applicable to the LCOs.

Schedule

ComEd has requested NRC approval of this amendment request within approximately six months. There are no specific schedule requirements associated with this amendment proposal. This amendment will be implemented within 90 days of issuance of the amendment.