

ATTACHMENT B  
PROPOSED AMENDMENTS TO THE  
LICENSE/TECHNICAL SPECIFICATIONS

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## INSTRUMENTATION

### SEISMIC MONITORING INSTRUMENTATION\*

#### LIMITING CONDITION FOR OPERATION

3.3.7.2 The seismic monitoring instrumentation shown in Table 3.3.7.2-1 shall be OPERABLE.

APPLICABILITY: At all times.

#### ACTION:

- a. With one or more seismic monitoring instruments inoperable for more than 30 days, prepare and submit a Special Report to the Commission pursuant to Specification 6.6.C within the next 10 days outlining the cause of the malfunction and the plans for restoring the instrument(s) to OPERABLE status.
- b. The provisions of Specification 3.0.3 are not applicable.

#### SURVEILLANCE REQUIREMENTS

4.3.7.2.1 Each of the above required seismic monitoring instruments shall be demonstrated OPERABLE by the performance of the CHANNEL CHECK, CHANNEL FUNCTIONAL TEST, and CHANNEL CALIBRATION operations at the frequencies shown in Table 4.3.7.2-1.

4.3.7.2.2 Each of the above required seismic monitoring instruments 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 Commission pursuant to Specification 6.6.C within 10 days describing the magnitude, frequency spectrum and resultant effect upon unit features important to safety.

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\*The Seismic Monitoring Instrumentation System is shared between La Salle Unit 1 and La Salle Unit 2.

\*\*The normal or emergency power source may be inoperable in OPERATIONAL CONDITION 4 or 5 or when defueled.

TABLE 3.3.7.2-1

SEISMIC MONITORING INSTRUMENTATION

<u>INSTRUMENTS AND SENSOR LOCATIONS</u>	<u>MEASUREMENT RANGE</u>	<u>MINIMUM INSTRUMENTS OPERABLE</u>
1. Triaxial Time-History Accelerographs		
a. Containment Foundation El. 673'-4"	$\pm 1g$ , 10 <sup>6</sup> :1 dynamic range, 0-32 Hz	1
b. Containment Structure El. 820'-6"	$\pm 1g$ , 10 <sup>6</sup> :1 dynamic range, 0-32 Hz	1
c. Free Field	$\pm 1g$ , 10 <sup>6</sup> :1 dynamic range, 0-32 Hz	1
d. Aux. Elec. Equip. Room	$\pm 1g$ , 10 <sup>6</sup> :1 dynamic range, 0-32 Hz	1
2. Triaxial Peak Accelerographs		
a. SGT5	$\pm 1g$ , 20:1 dynamic range, 0-20Hz	1
b. RHR Line in Reactor Building Rotunda	$\pm 1g$ , 20:1 dynamic range, 0-20Hz	1
c. HPCS Diesel Generator Control Panel	$\pm 1g$ , 20:1 dynamic range, 0-20Hz	1
d. Main Control Board	$\pm 1g$ , 20:1 dynamic range, 0-20Hz	1
3. Triaxial Seismic Switches		
a. Containment Foundation El. 673'-4"	0.005 to 0.15 g	1
b. Internal Trigger <sup>(b)</sup>	adjustable adjustable	1(a)
4. Triaxial Response-Spectrum Recorders		
a. Terra Tech. Digital Cassette with playback feature	- 1.0g to - 0.05 g + 0.05 g to 1.0 g	1

(a) With reactor control room annunciation.

(b) Adjustable setpoint.



TABLE 4.3.7.2-1

SEISMIC MONITORING INSTRUMENTATION SURVEILLANCE REQUIREMENTS

<u>INSTRUMENTS AND SENSOR LOCATIONS</u>	<u>CHANNEL - CHECK</u>	<u>CHANNEL FUNCTIONAL TEST</u>	<u>CHANNEL CALIBRATION</u>
1. Triaxial Time-History Accelerographs			
a. Containment Foundation	M	SA	R
b. Containment Structure	M	SA	R
c. Free Field	M	SA	R
d. Aux. Elec. Equip. Room	M	SA	R
2. Triaxial Peak Accelerographs			
a. SGTS	NA	NA	R
b. RHR Line in Reactor Building Rotunda	NA	NA	R
c. HPCS Diesel Generator Control Panel	NA	NA	R
d. Main Control Board	NA	NA	R
3. Triaxial Seismic Switches			
a. Containment Foundation	M <sup>(a)</sup>	SA	R
b. Internal Trigger	M	SA	R
4. Triaxial Response-Spectrum Recorders			
a. Terra Tech. Digital Cassette with playback feature	M	SA	R

<sup>(a)</sup> Except seismic trigger.

## INSTRUMENTATION

### BASES

3/4.3.7.2

~~2-4.3.7.2~~ SEISMIC MONITORING INSTRUMENTATION

e DELETED

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.

3/4.3.7.3 METEOROLOGICAL MONITORING INSTRUMENTATION

The OPERABILITY of the meteorological monitoring instrumentation ensures that sufficient meteorological data is available for estimating potential radiation doses to the public as a result of routine or accidental release of radioactive materials to the atmosphere. This capability is required to evaluate the need for initiating protective measures to protect the health and safety of the public. This instrumentation is consistent with the recommendations of Regulatory Guide 1.23 "Onsite Meteorological Programs," February, 1972.

3/4.3.7.4 REMOTE SHUTDOWN MONITORING INSTRUMENTATION

The OPERABILITY of the remote shutdown monitoring instrumentation ensures that sufficient capability is available to permit shutdown and maintenance of HOT SHUTDOWN of the unit from locations outside of the control room. This capability is required in the event control room habitability is lost and is consistent with General Design Criteria 19 of 10 CFR 50.



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## INSTRUMENTATION

### SEISMIC MONITORING INSTRUMENTATION\*

#### LIMITING CONDITION FOR OPERATION

3.3.7.2 The seismic monitoring instrumentation shown in Table 3.3.7.2-1 shall be OPERABLE.\*\*

APPLICABILITY: At all times.

#### ACTION:

- a. With one or more seismic monitoring instruments inoperable for more than 30 days, prepare and submit a Special Report to the Commission pursuant to Specification 6.6.C within the next 10 days outlining the cause of the malfunction and the plans for restoring the instrument(s) to OPERABLE status.
- b. The provisions of Specification 3.0.3 are not applicable.

#### SURVEILLANCE REQUIREMENTS

4.3.7.2.1 Each of the above required seismic monitoring instruments shall be demonstrated OPERABLE by the performance of the CHANNEL CHECK, CHANNEL FUNCTIONAL TEST, and CHANNEL CALIBRATION operations at the frequencies shown in Table 4.3.7.2-1.

4.3.7.2.2 Each of the above required seismic monitoring instruments 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 Commission pursuant to Specification 6.6.C within 10 days describing the magnitude, frequency spectrum and resultant effect upon unit features important to safety.

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\*The Seismic Monitoring Instrumentation System is shared between La Salle Unit 1 and La Salle Unit 2.

\*\*The normal or emergency power source may be inoperable in OPERATIONAL CONDITION 4 or 5 or when defueled.



TABLE 2.2.7.2-1

SEISMIC MONITORING INSTRUMENTATION

<u>INSTRUMENTS AND SENSOR LOCATIONS*</u>	<u>MEASUREMENT RANGE</u>	<u>MINIMUM INSTRUMENTS OPERABLE</u>
1. Triaxial Time-History Accelerographs		
a. Containment Foundation El. 673'-4"	$\pm 1g$ , $10^4:1$ dynamic range, 0-32 Hz	1
b. Containment Structure El. 820'-8"	$\pm 1g$ , $10^4:1$ dynamic range, 0-32 Hz	1
c. Free Field	$\pm 1g$ , $10^4:1$ dynamic range, 0-32 Hz	1
d. Aux. Elec. Equip. Room	$\pm 1g$ , $10^4:1$ dynamic range, 0-32 Hz	1
2. Triaxial Peak Accelerographs		
a. SSTS	$\pm 1g$ , 20:1 dynamic range, 0-20Hz	1
b. RDM Line in Reactor Building Rotunda	$\pm 1g$ , 20:1 dynamic range, 0-20Hz	1
c. HPCS Diesel Generator Control Panel	$\pm 1g$ , 20:1 dynamic range, 0-20Hz	1
d. Main Control Board	$\pm 1g$ , 20:1 dynamic range, 0-20Hz	1
3. Triaxial Seismic Switches		
a. Containment Foundation El. 673'-4"	0.005 to 0.15 g adjustable	1
b. Internal Trigger <sup>(b)</sup>	adjustable	1(a)
4. Triaxial Response-Spectrum Recorders		
a. Terra Tech. Digital Cassette with playback feature	- 1.0g to - 0.05 g + 0.05 g to 1.0 g	1

(a) With reactor control room annunciation.

(b) Adjustable setpoint.

\*All seismic sensors and instruments are located in La Salle Unit 1.

TABLE 4.3.7.2-1

SEISMIC MONITORING INSTRUMENTATION SURVEILLANCE REQUIREMENTS

<u>INSTRUMENTS AND SENSOR LOCATIONS*</u>	<u>CHANNEL CHECK</u>	<u>CHANNEL FUNCTIONAL TEST</u>	<u>CHANNEL CALIBRATION</u>
1. Triaxial Time-History Accelerographs			
a. Containment Foundation	N	SA	R
b. Containment Structure	N	SA	R
c. Free Field	N	SA	R
d. Aux. Elec. Equip. Room	N	SA	R
2. Triaxial Peak Accelerographs			
a. SETS	N.A.	N.A.	R
b. RRM Line in Reactor Building Rotunda	N.A.	N.A.	R
c. HPCS Diesel Generator Control Panel	N.A.	N.A.	R
d. Main Control Board	N.A.	N.A.	R
3. Triaxial Seismic Switches			
a. Containment Foundation	N <sup>(a)</sup>	SA	R
b. Internal Trigger	N	SA	R
4. Triaxial Response-Spectrum Recorders			
a. Terra Tech. Digital Cassettes with playback feature	N	SA	R

<sup>(a)</sup> Except seismic trigger.

\*All seismic sensors and instruments are located in La Salle Unit 2.



## INSTRUMENTATION

### BASES

3/4.3.7.2

#### ~~3/4.3.7.2~~ SEISMIC MONITORING INSTRUMENTATION DELETED

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. e

#### 3/4.3.7.3 METEOROLOGICAL MONITORING INSTRUMENTATION

The OPERABILITY of the meteorological monitoring instrumentation ensures that sufficient meteorological data is available for estimating potential radiation doses to the public as a result of routine or accidental release of radioactive materials to the atmosphere. This capability is required to evaluate the need for initiating protective measures to protect the health and safety of the public. This instrumentation is consistent with the recommendations of Regulatory Guide 1.23 "Onsite Meteorological Programs," February, 1972.

#### 3/4.3.7.4 REMOTE SHUTDOWN MONITORING INSTRUMENTATION

The OPERABILITY of the remote shutdown monitoring instrumentation ensures that sufficient capability is available to permit shutdown and maintenance of HOT SHUTDOWN of the unit from locations outside of the control room. This capability is required in the event control room habitability is lost and is consistent with General Design Criteria 19 of 10 CFR 50.

## ATTACHMENT C SIGNIFICANT HAZARDS CONSIDERATION

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 Specifications requirements to licensee-controlled documents as discussed in 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.

This change is required as a result of a Modification which replaces 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.

ComEd has evaluated the proposed Technical Specification Amendment and determined that it does not represent a significant hazards consideration. Based on the criteria for defining a significant hazards consideration established in 10 CFR 50.92, operation of LaSalle County Station Units 1 and 2 in accordance with the proposed amendment will not:

- 1) Involve a significant increase in the probability or consequences of an accident previously evaluated because:

The function of the seismic monitoring instrumentation is to monitor seismic activity above the Operating-Basis Earthquake (OBE) threshold, and to record observed seismic data for comparison to design basis response spectra. The seismic monitoring instrumentation does not provide any function to mitigate an accident or the consequences of an accident. The replacement seismic monitoring instrumentation will remain in place. The proposed Amendment is not a result of any changes to system function, alarm setpoints, or main control room annunciators. Rather, the Technical Specification requirements (as revised for the replacement instrumentation) are being relocated to licensee-controlled documents in accordance with NRC Generic Letter 95-10.

The proposed change relocates requirements and surveillances for structures, systems, components or variables that do not meet the criteria for inclusion in Technical Specifications as identified in the Application of Selection Criteria to

## ATTACHMENT C SIGNIFICANT HAZARDS CONSIDERATION

the LaSalle Technical Specifications. The affected structures, systems, components or variables are not assumed to be initiators of analyzed events and are not assumed to mitigate accident or transient events. The requirements and surveillances for these affected structures, systems, components or variables will be relocated from the Technical Specifications to an appropriate administratively controlled document which will be maintained pursuant to 10 CFR 50.59. In addition, the affected structures, systems, components or variables are addressed in existing surveillance procedures which are also controlled by 10 CFR 50.59 and subject to the change control provisions imposed by plant administrative procedures, which endorse applicable regulations and standards. Therefore, this change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

- 2) Create the possibility of a new or different kind of accident from any accident previously evaluated because:

The seismic monitoring instrumentation does not provide any function to mitigate an accident or the consequences of an accident. The replacement seismic monitoring instrumentation will remain in place and will provide the same basic function as the existing instrumentation. The replacement instrumentation will provide enhanced system reliability and will not result in any changes to system function, alarm setpoints, or main control room annunciators. The Technical Specification requirements (as revised for the replacement instrumentation) are being relocated to licensee-controlled documents in accordance with NRC Generic Letter 95-10.

The proposed change does not involve any change in the methods governing normal plant operation. The proposed change will not impose or eliminate any requirements and adequate control of existing requirements will be maintained. Thus, this change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

ATTACHMENT C  
SIGNIFICANT HAZARDS CONSIDERATION

- 3) Involve a significant reduction in the margin of safety because:

The replacement seismic monitoring instrumentation will have no impact on margin of safety. The intended function of the seismic monitoring instrumentation, i.e. to record observed seismic data for analysis to determine the impact on plant components, will be made more reliable by this modification. The Technical Specification requirements (as revised for the replacement instrumentation) are being relocated to licensee-controlled documents in accordance with NRC Generic Letter 95-10.

The proposed change will not reduce a margin of safety because it has no impact on any safety analysis assumptions. In addition, the relocated requirements and surveillances for the affected structure, system, component or variable continue to meet the same requirements as the existing Technical Specifications. However, 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) will not be included in the ATR since the Technical Specification Special Report requirements are only applicable to the LCOs. Since any future changes to these requirements or the surveillance procedures will be evaluated per the requirements of 10 CFR 50.59, no reduction in a margin of safety will be permitted.

The existing requirement for NRC review and approval of revisions, in accordance with 10 CFR 50.92, to these details proposed for relocation does not have a specific margin of safety upon which to evaluate. However, since the proposed change is consistent with the BWR Standard Technical Specification, NUREG-1434, Rev.1 approved by the NRC Staff, revising the Technical Specifications to reflect the approved level of detail ensures no significant reduction in the margin of safety.

Guidance has been provided in "Final Procedures and Standards on No Significant Hazards Considerations," Final Rule, 51 FR 7744, for the application of standards to license change requests for determination of the existence of significant hazards considerations. This document provides examples of amendments which are and are not considered likely to involve significant hazards considerations. These proposed amendments most closely fit the example of a change which may either result in some increase to the probability or consequences of a previously analyzed accident or may

## ATTACHMENT C SIGNIFICANT HAZARDS CONSIDERATION

reduce in some way a safety margin, but where the results of the change are clearly within all acceptable criteria with respect to the system or component specified in the Standard Review Plan.

This proposed amendment does not involve a significant relaxation of the criteria used to establish safety limits, a significant relaxation of the bases for the limiting safety system settings or a significant relaxation of the bases for the limiting conditions for operations. Therefore, based on the guidance provided in the Federal Register and the criteria established in 10 CFR 50.92(c), the proposed change does not constitute a significant hazards consideration.

ATTACHMENT D  
ENVIRONMENTAL ASSESSMENT STATEMENT APPLICABILITY REVIEW

ComEd has evaluated the proposed amendment against the criteria for identification of licensing and regulatory actions requiring environmental assessment in accordance with 10 CFR Part 51.21. It has been determined that the proposed changes meet the criteria for categorical exclusion as provided for under 10 CFR Part 51.22(c)(9). This conclusion has been determined because the changes requested do not pose significant hazards considerations or do not involve a significant increase in the amounts, and no significant changes in the types of any effluents that may be released off-site. Additionally, this request does not involve a significant increase in individual or cumulative occupational radiation exposure.