



Commonwealth Edison

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Address Reply to: Post Office Box 767
Chicago, Illinois 60690

September 23, 1985

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Subject: LaSalle County Station Units 1 and 2
Proposed Emergency Technical
Specification Amendment for Facility
Operating Licenses NPF-11 and NPF-18
Waiver of 18-Month Surveillance Interval
NRC Docket Nos. 50-373 and 50-374

- References (a): July 15, 1985 letter from H. L. Massin
to H. R. Denton.
- (b): August 9, 1985 letter from H. L. Massin
to H. R. Denton.
- (c): September 20, 1985 letter from W. R. Butler
to D. L. Farrar transmitting NPF-11,
Amendment 24.

Dear Mr. Denton:

Pursuant to 10 CFR 50.90, Commonwealth Edison Company (CECo) proposes an emergency amendment to Appendix A, Technical Specifications, for Operating Licenses NPF-11 and NPF-18. The proposed changes provide deferral of one 18-month interval surveillance requirement for each unit to allow LSCS Unit 1 to continue operation past September 27th.

Reference (a) submitted a request for approval of a one-time-only waiver of a limited number of 18-month interval surveillance requirements for LaSalle County Unit 1 first cycle. Reference (b) modified the initial submittal to delete items completed during an unplanned outage. While preparing for the upcoming outage, it was determined that while all the surveillances which needed to be deferred were included in the submittals referenced, two of the corresponding Technical Specification references were inadvertently omitted. This was discovered on September 18, 1985, and was discussed with your staff on September 20, 1985 after it was confirmed no other similar omissions had been made.

On September 20, 1985 it was judged that these two additions to our request did not qualify as "administrative" changes to your evaluation of Reference (b) due to Federal Register notification requirements. Accordingly, they were not included with the amendment issued on September 20, 1985 (Reference (c)).

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The emergency situation arises because the previous submittals did not include two Technical Specification references. Without the proposed amendments the following will occur:

- (a): LaSalle County Unit 1 cannot continue operation past September 27, 1985 due to surveillance requirement 4.5.1.c for the Low Pressure Coolant Injection (LPCI) Systems A, B, and C.
- (b): LaSalle County Unit 1 will be forced to shutdown on no later than September 27, 1985 to perform surveillance requirement 4.8.1.1.2.d for the Unit 1 Division 2 (1A) diesel generator to allow this diesel generator to remain operable for Unit 2 and thus allow continued operation of Unit 2.

Specification 4.5.1.c was not included with Reference (b). The 18 month surveillance for Technical Specification 4.3.3.2 was included in Reference (b) and waived by reference (c). The surveillance requirement of Technical Specification 4.3.3.2 is redundant and functionally equivalent to Technical Specification 4.5.1.c for the LPCI system. The logic system functional test for the Low Pressure Coolant Injection System is performed by surveillance procedure LES-RH-01 which satisfies both Specifications 4.3.3.2 and 4.5.1.c. No change to the significance or impact on plant safety will occur because no change to references (a) and (b) has occurred except to include the additional Tech Spec reference.

Attachment A of Reference (a), Item 4.a for Division II "A" diesel generator affects the Unit 2 Technical Specifications in that the 1A diesel is required to be operable for Unit 2 operation. The surveillance of specification 4.8.1.1.2.d address the ability of the diesel generator system to supply sufficient emergency power to the unit to which it is assigned. The requirements were deferred for Unit 1 (Reference (c)). The power requirements for which the 1A diesel is necessary to support Unit 2 operation are much less than those required for Unit 1. The 1A diesel's only power requirements for Unit 2 are the standby gas treatment system subsystem A, Unit 1 drywell and suppression chamber hydrogen recombiner system, and the control room and auxiliary electric equipment room emergency filtration system train A. Therefore since the diesel generator will be operable for Unit 1 operation during the extension period granted by reference (c), it should be considered operable for Unit 2 operation during the same period since the Unit 2 surveillance requirements are identical to those of Unit 1. Since the same diesel generator is affected, no additional impact will occur. The Unit 2 Specification 4.8.1.1.2.d was inadvertently omitted from the original submittal.

CECo believes that the amendment involves no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. Given our belief that the amendment involves no significant hazards consideration and has no environmental impact, we believe that the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9).

September 23, 1985

The proposed amendment can be found in Attachment 1 and has been both Onsite and Offsite reviewed. We have reviewed this amendment request and find that no significant hazards consideration exists. Our review is documented in Attachment 2. Commonwealth Edison has notified the State of Illinois of our request for this amendment and our appraisal on the question of no significant hazards by telephone call and transmittal of a copy of this letter and its attachments to the designated State Official.

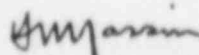
This approval is required by September 25, 1985. LaSalle Unit 1 will begin an unscheduled shutdown on September 26, 1985 in order to perform the required surveillances before they become due on September 27, 1985. The outage time would be a minimum of 3 days. An unscheduled outage is not in the interests of safe operation nor is it consistent with our request for an extension of certain 18-month surveillances to allow time for planning and to more fully utilize the Unit 1 core.

This request could not have been reasonably foreseen because all the surveillance procedures were addressed in prior submittals. The computer tracking program controls surveillances by due dates of the procedures used to satisfy the Tech Spec requirements. More than one Tech Spec is complied with by some procedures. There was no prior need to sort all the procedures by Tech Spec. This emergency request does not defer additional requirements, it simply includes two additional Technical Specification references that were inadvertently omitted from the previous submittals.

In accordance with 10 CFR 170, a fee remittance in the amount of \$150.00 is enclosed. Please direct any questions you may have concerning this matter to this office.

Three signed original and thirty-seven (37) copies of this transmittal and its attachments are provided for your use.

Very truly yours,



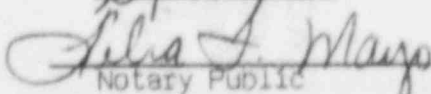
H. L. Massin
Nuclear Licensing Administrator

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Attachments (1): Technical Specification Changes to NPF-11 and NPF-18
(2): Evaluation of Significant Hazards Consideration

cc: Region III Inspector - LSCS
A. Bournia - NRR
M. C. Parker - State of IL

SUBSCRIBED AND SWORN to
before me this 23rd day
of September, 1985


Notary Public