

ATTACHMENT A

TECHNICAL SPECIFICATION CHANGE REQUEST

LASALLE COUNTY STATION UNIT 1

SUBJECT: Extension of a Limited Number of 18 Month Interval Surveillance Requirements for First Refuel

The Technical Specifications require many surveillance tests to be performed every 18 months (plus a maximum extension defined by specification 4.0.2). To adequately utilize the core (i.e., attain at least the minimum exposure interval for Cycle 1), to allow completion of parts procurement and design review for license conditions and other plant modifications and to factor in Commonwealth Edison system considerations which may arise, Commonwealth Edison requests approval for a one-time-only waiver of a limited number of 18-month frequency Technical Specifications surveillance requirements for Cycle 1, provided the surveillance is performed during the first refueling outage. The Technical Specification requirements which are requested to be waived are specified on the following pages. All other surveillance schedules for the planned Fall 1985 outage were completed during unscheduled outages during Cycle 1.

The surveillances requested to be waived require a plant shutdown or a plant shutdown results from the surveillance. All daily, monthly and quarterly surveillances have been and will continue to be performed as required.

The 18 month surveillance interval was selected to be consistent with the maximum anticipated interval between refueling outages. Specification 4.0.2 allows an extension to this 18 month frequency to accommodate operations scheduling. However this extension (25%) is limited to a maximum of  $3.25 \times 18$  months for 3 consecutive surveillance intervals. The "due date" indicated includes this allowed extension. The end of the most limiting surveillance interval, including the allowable 25% extension, is September 22, 1985. Refuel 1 is expected to commence on or before October 27, 1985. The period of plant operation during the requested extensions, therefore, is a maximum of 36 days.

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The LaSalle County Station Unit 1 has been through an extended startup program and has been shutdown several times for equipment failure, feedwater check valve problems, environmental qualification upgrade, etc throughout the first cycle (Cycle 1). Even though this unit has shutdown to perform "refueling" surveillances during mid-cycle before (including the surveillances listed on the following pages) these surveillances again come due before the optimum start of the actual refueling outage. We have concluded, based on a review of past surveillance records that these tests were satisfactory during the previous performance and therefore there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner. The systems, valves, or instruments will not degrade unacceptably if these selected surveillance intervals are extended to October 27, 1985.

1. Logic/Functional Testing

<u>Specification</u>	<u>Description</u>	<u>Due Date</u>
4.3.1.2	Reactor Protection System (RPS)	<del>9/28/85</del> 10-8-85 **
Table 4.3.3.1-1 4.3.3.2	Low Pressure Coolant Injection	9/27/85
4.3.4.1.2	ATWS-RPT	9/30/85
<del>4.3.4.2.2</del>	<del>EOC-RPT</del>	<del>9/30/85</del> DONE
Table 4.3.7.11-1	Off-Gas Post Treatment Monitor	10/12/85
4.3.8.2	Feedwater/Main Turbine High Level Trip	10/20/85
<del>4.4.2.2</del>	<del>Low-Low Setpoint</del>	<del>10/08/85</del> DONE
4.6.1.4.c	MSIV Leakage Control	10/06/85
4.8.3.3.1	Thermal Overload Bypass-RHR Valves	10/08/85*

There is no safety significance to delaying these tests for a short period of time. All of the above systems have functional tests and/or calibrations which are within their Tech Spec surveillance frequency. These functional or calibration tests verify operability of the instrumentation and/or components of which this logic system is a part. In many cases these tests cover the majority of the logic system. (For

example all channels of RPS are half scram tested monthly except the mode switch in shutdown position scram). The testing performed to meet the above specification generally entails verification that all portions work together. The result of this testing however requires actuation of systems in a mode which is not possible during normal power operation. Since the parts of the systems which are more likely to fail (valves, instruments, etc) are verified operable by current surveillances during the extension period, no impact on plant safety will occur.

\* - For non-primary containment automatic isolation valves bypassed under accident conditions.

*\*\* - Neutron monitoring portion completed; mode switch not completed.*

2. Pressure Isolation Valves-Specification 4.4.3.2 (Table 3.4.3.2-1)

<u>VALVE NUMBER</u>	<u>TYPE</u>	<u>DUE</u>	<u>FUNCTION</u>
1E12-F042B	Gate	9/22/85	LPCI B Injection
1E12-F042C	Gate	9/22/85	LPCI C Injection
1E12-F053B	Globe	9/22/85	Shutdown Cooling Return B
1E21-F005	Gate	9/22/85	LPCS Injection

A redundant valve in each line listed above will remain within the Tech Spec surveillance interval. No valves listed are check valves. Gate and Globe valves have had a good history of meeting the leakage rate requirements. Alarms monitor the low pressure piping to ensure any leakage is detected (alarm function is tested every 31 days). All valves were last left with zero leakage. These valves cannot be tested with the reactor vessel at pressure. The test also requires access to the drywell which is inerted.

3. Calibrations

<u>Specification</u>	<u>Description</u>	<u>Due Date</u>	
a. Table 4.3.1.1-1-10	Turbine Control Valve Pressure Switches	10/6/85	
b. 4.4.3.1.b	Prim Cont. Floor Drain Sump Flow Monitoring	10/6/85	
<del>c. 4.8.3.2</del>	<del>Prim Cont. Overcurrent Protection</del>	<del>9/25/85</del>	<b>DONE</b>
<del>Table 3.8.3.2-1 b)</del>	<del>480V</del>		

The items ~~(except c)~~ listed above receive periodic functional testing to ensure the ability of the system to operate if required. ~~Item c is protected by wiring which is sized to fail prior to the electrical penetration. Also, for item c only 10% are required to be tested each interval yet since there are only two breakers to be tested 1 of 2 are tested each 18 months which exceeds the Tech Spec requirement.~~ All devices were found within acceptable limits at the last surveillance.

Item a: Requires that the turbine control oil system be shutdown and requires access to the main turbine control valves. The turbine control oil system cannot be secured if the turbine is on line or if the bypass valves are passing steam. Therefore, the unit would have to shutdown to critical behind the MSIVs to perform this test.

Item b: To perform this calibration requires access to the drywell (inerted).

~~Item c: To perform this test the primary containment ventilation fans would need to be shutdown which would cause excessive drywell temperatures.~~

#### 4. Electric Power Source

- a. Specification 4.8.1.1.2.d.\* These diesel tests are done normally while shutdown during refueling (required by Tech Specs). They are included in the testing program to ensure that periodically certain functions have not degraded. These tests include logic testing, preventative maintenance, etc. The diesel generators are verified to be operable while in operation by performing several surveillances required by specifications 4.8.1.1.2.a, b and c. This ensures that the diesel will start, will accept load and has available such auxiliaries as necessary. This applies to Divisions II and III only. All Division I testing will remain within the required interval. Due ~~10/2/85~~ - Div. III, ~~10/10/85~~ 9/27/85 9/28/85 Div. II.
- b. Division III battery service test Specification 4.8.2.3.2.d.2.c - This test only verifies that the battery still has sufficient capacity by actual testing. However verification that battery gravities and voltages are proper assures that the battery will be available if required. This slight delay does not affect battery availability. Technical Specification requires shutdown to perform this surveillance. Due 9/25/85.

\*All Division III diesel generator testing was completed during this unscheduled outage except for the diesel inspection required by Technical Specification 4.8.1.1.2.d.1.



5. Others

- a. ~~Specification 4.1.5 c.1 - Injection of Standby Liquid Control System into the reactor vessel using demineralized water. Verification of pump operability is still maintained through other current surveillances. This test only verifies the flow path to the reactor vessel. This test would make Standby Liquid Control inoperable. Due 10/20/85.~~ **DONE**
- b. Performance of a leak test required by Table 3.6.3-1 note (j) for valves 1B33-F013A,B and 1B33-F017A,B. This is a water leak test to verify that these check valves are able to close. These lines are small (3/4") which provides seal injection water to the recirculation pumps from the CRD System. This test requires access to drywell. Due 9/26/85.
- c. ~~Specification 4.1.3.1.4.a - Timing of Scram discharge volume vent and drain valves during reactor scram. Vent and Drain valves are tested (timed) quarterly per Tech Spec 4.1.3.1.1 and 4.0.5 to ensure times are within tolerance. Requires scram to perform. Due 10/20/85.~~ **DONE**

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ATTACHMENT B

PROPOSED CHANGE TO APPENDIX A

TECHNICAL SPECIFICATIONS TO OPERATING LICENSE

NPF-11

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