

CONFORMANCE TO GENERIC LETTER 83-28  
ITEMS 3.1.3 AND 3.2.3  
LASALLE COUNTY STATION  
UNIT NOS. 1 AND 2, WNP-2

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## ABSTRACT

This EG&G Idaho, Inc. report provides a review of the submittals for several nuclear plants for conformance to Generic Letter 83-28, items 3.1.3 and 3.2.3. The specific plants reviewed were selected as a group because of similarity in type and applicability of the review items. The group includes the following plants:

Plant	Docket Number	TAC Numbers
LaSalle 1	50-373	53012, 53850
LaSalle 2	50-374	53851
WNP-2	50-397	53896

## FOREWORD

This report is supplied as part of the program for evaluating licensee/applicant conformance to Generic Letter 83-28 "Required Actions based on Generic Implications of Salem ATWS Events." This work is conducted for the U.S. Nuclear Regulatory Commission, Office of Nuclear Reactor Regulation, Division of System Integration by EG&G Idaho, Inc., NRC Licensing Support Section.

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CONFORMANCE TO GENERIC LETTER 83-28

ITEMS 3.1.3 AND 3.2.3

LA SALLE COUNTY STATION UNIT NOS. 1 AND 2, WNP-2

1. INTRODUCTION

On July 8, 1983, Generic Letter No. 83-28<sup>1</sup> was issued by D. G. Eisenhut, Director of the Division of Licensing, Nuclear Reactor Regulation, to all licensees of operating reactors, applicants for operating licenses, and holders of construction permits. This letter included required actions based on generic implications of the Salem ATWS events. These requirements have been published in Volume 2 of NUREG-1000, "Generic Implications of ATWS Events at the Salem Nuclear Power Plant".<sup>2</sup>

This report documents the EG&G Idano, Inc. review of the submittals for the LaSalle County Station Unit Nos 1 and 2 and WNP-2 plants for conformance to items 3.1.3 and 3.2.3 of Generic Letter 83-28.

The submittals from the licensees utilized in these evaluations are referenced in section 7 of this report.

These review results are applicable to the group of nuclear plants previously identified because of their similarity. These plants are similar in the following respects.

1. They are operating GE-BWR reactors
2. They are 1969 (Model 5) reactors
3. They utilize two class 1E Power System Trains
4. They use relay logic in the Reactor Trip Systems.

An item of concern identified for any one of these plants is assumed to be potentially significant for all of the plants in the group.

## 2. REVIEW REQUIREMENTS

Item 3.1.3 (Post-Maintenance Testing of Reactor Trip System Components) requires licensees and applicants to identify, if applicable, any post-maintenance test requirements for the Reactor Trip System (RTS) in existing technical specifications which can be demonstrated to degrade rather than enhance safety. Item 3.2.3 extends this same requirement to include all other safety-related components. Any proposed technical specification changes resulting from this action shall receive a pre-implementation review by NRC.

## 3. GROUP REVIEW RESULTS

The relevant submittals from each of the named reactor plants were reviewed to determine compliance with items 3.1.3 and 3.2.3 of the Generic Letter. First, the submittals from each plant were reviewed to determine that these two items were specifically addressed. Second, the submittals were checked to determine if there were any post-maintenance test items specified by the technical specifications that were suspected to degrade rather than enhance safety. Last, the submittals were reviewed for evidence of special conditions or other significant information relating to the two items of concern. The results of this review are summarized for each plant in Table 1.

All of the responses indicated that there had been no items identified from the licensee review of the technical specifications relating to post-maintenance testing that could be demonstrated to degrade rather than enhance safety. However, the licensees gave no insight on the depth of review conducted on these two items.

The BWR Owners Group is presently addressing Generic Letter 83-28 item 4.5.3<sup>3</sup> which may result in proposed changes to the technical specification requirements for surveillance testing frequency and out-of-service intervals for surveillance testing. The primary concern of item 4.5.3 is the surveillance testing intervals. Items 3.1.3 and 3.2.3 are specifically directed at post-maintenance test requirements. These concerns are essentially independent. However, the evaluations of these concerns are coordinated so that any correlation between these concerns will be adequately considered. Since no specific proposal to change the technical specifications has been proposed, there is no identifiable need at this time for correlating the reviews of item 4.5.3 with this review.

TABLE 1.

Plants	Were Items 3.1.3 and 3.2.3 Addressed in the Submittal	Licensee Findings	Response Acceptable	Comments
LaSalle Unit 1 and 2	Yes	No tech. spec. items identified that degrade safety	yes	--
WNP-2	Yes	No tech. spec. items identified that degrade safety	yes	--

## 5. REVIEW RESULTS FOR WNP-2

### 5.1 Evaluation

Washington Public Power Supply System, the licensee for WNP-2, provided responses to items 3.1.3 and 3.2.3 of Generic Letter 83-28 on November 18, 1983.<sup>5</sup> Within the responses, the licensee's evaluation for items 3.1.3 and 3.2.3 is that no technical specification requirements for post-maintenance testing have been identified which will result in degraded safety of the reactor trip system and other safety-related components. The licensee has committed to continuously review incoming vendor information and engineering recommendations with respect to impact on components reliability. Should the potential for degradation of safety due to post-maintenance test requirements be identified, the licensee will submit appropriate changes and justification for NRC approval.

### 5.2 Conclusion

Based on the licensee's statement that they have reviewed their technical specification requirements to identify any post maintenance testing which could be demonstrated to degrade rather than enhance safety and found none that degraded safety, we find the licensee's responses acceptable.

The licensee's commitment to continue to review incoming vendor information and engineering recommendations regarding identification of requirements that could degrade safety, provides additional assurance that the technical specifications will continue to provide a basis for safe plant operation and is acceptable.

## 7. REFERENCES

1. NRC Letter, D. G. Eisenhower to all Licensees of Operating Reactors, Applicants for Operating License, and Holders of Construction Permits, "Required Actions Based on Generic Implications of Salem ATWS Events (Generic Letter 83-28)", July 8, 1983.
2. Generic Implications of ATWS Events at the Salem Nuclear Power Plant, NUREG-1000, Volume 1, April 1983; Volume 2, July 1983.
3. BWR Owners' Group Responses to NRC Generic Letter 83-28, Items 4.5.3, General Electric Company Proprietary Information, NEDC-30844, January 1985.
4. Commonwealth Edison letter to NRC, P. L. Barnes to H. R. Denton, Director, Office of Nuclear Reactor Regulation, NRC, "Dresden Station Units 2 and 3, Quad Cities Station Units 1 and 2, Zion Station Units 1 and 2, LaSalle County Station Units 1 and 2, Byron Station Units 1 and 2, Braidwood Station Units 1 and 2, Response to Generic Letter No. 83-28, NRC Docket Nos. 50-237/249, 50-254/265, 50-295/304, 50-373/374, 50-454/455, and 50-456/457," November 5, 1983.
5. Washington Public Power Supply System letter to NRC, G. C. Sorensen, Manager, Regulatory Programs to A. Schwencer, Chief, Licensing Branch No. 2, Division of Licensing, NRC, "Nuclear Project No. 2, Response to Generic Letter 83-28," November 18, 1983, G02-83-1076.