

MAR 04 1988

Docket No. 50-373

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Commonwealth Edison Company
ATTN: Mr. Cordell Reed
Senior Vice President
Post Office Box 767
Chicago, IL 60690

Gentlemen:

This is in response to a letter dated February 2, 1988, from Ms. I. Johnson of your staff to Mr. A. B. Davis, which transmitted proposed Revision 3 to the LaSalle County Station's Emergency Action Levels (EALs) and a supporting "EAL Philosophy" document. This submittal was in response to the staff's concerns on an earlier proposed revision to the Station's EALs. These concerns had been provided to you by my letter dated December 19, 1986.

We have reviewed the February 2 submittal and have concluded that our December 1986 concerns have been satisfactorily addressed. However, a generic concern has since arisen regarding Unusual Event EALs for earthquakes. Proposed EAL No. 6I does not adequately reflect regulatory guidance which states that an Unusual Event declaration is warranted upon receipt of a valid seismic monitoring system indication, or if onsite personnel have felt an earthquake. Therefore, EAL No. 6I must be revised before it can be considered adequate. Otherwise, proposed Revision 3 to the EALs is acceptable, as the other EALs do not decrease the effectiveness of the emergency plans for the LaSalle Station.

Proposed EAL No. 6I relies too heavily on the seismic monitoring system's operability, while placing insufficient emphasis on the distinct possibility that onsite personnel may experience an earthquake while monitoring equipment is out of service or has malfunctioned. (Technical Specifications allow this equipment to be inoperable for over a month before the NRC must be informed of its inoperability.) The EAL's reference to confirmation of an earthquake by "corroborant offsite sources" is acceptable provided that such confirmation is timely and reliable (such as notification by local government officials, or confirmation by seismic information centers). However, onshift personnel should be prudent in considering an Unusual Event declaration for an earthquake in the absence of any reliable human or monitoring equipment evidence of an earthquake being detected onsite.

In addition to the required change to EAL No. 6I, we suggest that your staff correct typographical errors in EALs No. 7G and 7J. The "EAL Philosophy" document refers to ammonia and chlorine as being hazardous or toxic substances of concern. While these EALs specify a concentration value for ammonia, none is listed for chlorine gas as in the previous EAL submittal.

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Be advised that 10 CFR 50.54(q) requires prior NRC approval of any changes to your plan which may decrease the effectiveness of the plan. However, if your safety review assures no decrease in emergency preparedness effectiveness, then changes to the plan may be made and implemented without prior NRC approval. In all cases, you must furnish copies of each proposed change to the NRC in accordance with 10 CFR 50.54(q). Also, any changes to the Emergency Plan Implementing Procedures should be made in accordance with the requirements of 10 CFR 50, Appendix E, Section V.

In accordance with 10 CFR 2.790 of the Commission's regulations, a copy of this letter will be placed in the NRC Public Document Room.

Should you have any questions regarding this letter, please contact Mr. T. Ploski of my staff at (312) 790-5529.

Sincerely,

"Original signed by W.D. Shafer"

W. D. Shafer, Chief
Emergency Preparedness and
Radiological Protection Branch

cc: D. Butterfield, Nuclear
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RIII
TP
Ploski/mb
YES

RIII
8/6
Snell
YES

RIII
Ring 3/4/88

RIII
Shafer