



Commonwealth Edison

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March 16, 1988

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

Subject: LaSalle County Station Units 1 and 2
Proposed Amendment to Technical
Specifications for Facility Operating
License NPF-11 and NPF-18
NRC Docket No. 50-373 and 50-374

- References (a): Federal Register Vol. 51 No. 44
dated March 6, 1986
- (b): Final Report of the Technical Specification
Improvement Project dated September 30, 1987
- (c): Generic Letter 83-27 dated July 6, 1983.

Dear Sir:

Pursuant to 10 CFR 50.90 Commonwealth Edison proposes a one-time amendment to Facility Operating Licenses NPF-11 and NPF-18. This amendment is being submitted for your staff's review and approval and is in accordance with Reference (a). It will be in effect from date of issuance through the restart of Unit 2 from refuel 2, expected to be in early, 1989.

The proposed amendment identifies that the provisions of section 4.0.2.b of Technical Specifications would not apply to certain refuel interval surveillances for Unit 1 Cycle 3 and Unit 2 Cycle 2. Waiver of these requirements for the short time needed, has no safety significance. This amendment will allow continued operation of Unit 2 until the scheduled refuel date of October, 1988. It will allow restart and operation of Unit 1 until the Unit 2 surveillances can be performed during the Unit 2 outage that affect Unit 1.

This amendment is a one-time request in which extraordinary circumstances have caused a significant change in the scheduled refuel outages. This meets the criteria indicated in Reference (c) final paragraph "...infrequent one time only changes may be granted for plant-specific conditions where adequate justification is given".

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March 16, 1988

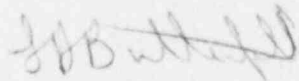
Attachment A provides an introduction and discussion. Attachment B provides copies of the changes to be made to the Facility Licenses. Commonwealth Edison has reviewed this document and finds that no significant hazards exists. This review is documented in Attachment C.

Commonwealth Edison is notifying the State of Illinois of our request for this amendment by transmitting a copy of this letter and attachments to the designated state official.

In accordance with 10 CFR 170, a fee remittance in the amount of \$150.00 is enclosed.

The effective date of this amendment should be the date of issuance. If you have any additional questions regarding this matter, please contact this office.

Very truly yours,



C. M. Allen
Nuclear Licensing Administrator

lm

Attachments

cc: Paul Shemanski - NRR
Regional Administrator - RIII
NRC Resident Inspector - LSCS
M. C. Parker - IDNS

ATTACHMENT A

BACKGROUND AND DISCUSSION

BACKGROUND

LaSalle County is faced with scheduling problems for the Unit 2 Cycle 2 refuel outage. This problem is a direct result of first cycle operating history and Unit 1 second cycle equipment problems. As a result of these problems, the first or second surveillance intervals exceeded 18 months. Since these intervals exceeded 18 months, the amount of time in excess of 18 months is deducted from the 3.2% limit of technical specification 4.0.2.b.

The Unit 1 Cycle 2 refuel outage was originally scheduled to begin on December 7, 1987, however, problems with one of the reactor recirculation pumps necessitated Unit 1 operation in single loop at 50% power level for an extended period of time. Additionally, a major outage of approximately three months duration was required to repair the recirculation pump. As a result of these delays in the fuel cycle, it was necessary to reschedule the Unit 1 Cycle 2 refuel outage to ensure an adequate utilization of the installed fuel. The outage is now scheduled to begin on March 13, 1988 and to end in early July 1988.

The extension of the Unit 1 fuel cycle has therefore impacted the Unit 2 outage schedule. Unit 2 was originally scheduled to begin the next refuel outage on July 23, 1988. This schedule would have resulted in a near overlap of the Unit 1 and 2 outages. A two unit outage is very difficult to plan for and requires exacting scheduling of equipment and services procurement and results in competition for limited station resources. Based on these problems, it was decided to reschedule the Unit 2 refuel outage to begin on October 15, 1988 and to end in early 1989. The outage start date was moved as far back as the fuel cycle would permit in order to give a maximum amount of time for planning, procurement, and scheduling between the Unit 1 and Unit 2 outages. However, this extension to the Unit 2 fuel cycle requires extension to several of the refuel interval surveillance requirements specified by the technical specifications. Therefore, relief is required for Unit 2 equipment which have refuel surveillance requirements in the Unit 1 and the Unit 2 technical specifications.

DISCUSSION

Of the total of approximately 600 refuel surveillances, about 6% are due before the scheduled outage date of October 15, 1988. The first of these surveillances is due on June 15, 1988. Therefore, the maximum extension for any single surveillance would be four months. Since the allowable interval

for three consecutive surveillances is 58.5 months (18 months x 3.25), this represents an extension of less than 7% beyond the specified combined surveillance interval but will not exceed the 18 months +25% in any case.

Technical Specification 4.0.2 allows a required surveillance time interval to be extended by as much as 25% provided that the combined extension time for three consecutive intervals does not exceed 3.25 times the specified time interval. For refuel interval surveillances, these allowances generally provide a sufficient degree of flexibility (22.5 months) for outage planning over two time intervals. However, when this flexibility is used, the 3.25 criteria becomes increasingly difficult to meet. Usually technical specification relief or a mid-cycle surveillance outage is required in order to remain within the requirements of the unit license.

For LaSalle Unit 2, surveillance items that require surveillance interval extension will become due solely because of the requirements of the 3.25 maximum combined surveillance limit (Technical Specification 4.0.2.b). Given relief of the 3.25 maximum combined requirement the surveillance will be completed within the NKC allowable interval between any two tests allowed by technical specification 4.0.2.a.

A detailed review of surveillances affected by this request has been performed. Based on this review, the probability that surveillances will not meet their acceptance criteria is not expected to be affected by the extension addressed in this request. The conclusion of this review is that the exception will not result in any significant degradation of equipment for which the exception is granted.

At the time the original Standard Technical Specification (STS) was developed the refuel surveillance interval was established, following consultations with various industry experts, at what was perceived to be the expected fuel cycle length (References (b) and (c)). Since that time, it has become apparent that the interval allowed by the STS for the fuel cycle is not sufficient given the present fuel design and the operational problems encountered. Another large contributor for this time interval increase is the addition of a large number of lengthy plant modifications to normal refuel surveillance outages. These plant modifications are required to meet license commitments or have been mandated by new regulations and requirements.

The last Unit 2 outage lasted approximately 6 months. The refuel interval surveillances for which extensions are required were performed in the first three months of the outage. The margin provided by the 3.25 interval requirement was used up in the period of shutdown and the plant will actually have been operated for less than 18 months between refueling outages (startup to shutdown).

Reference (b) provides the following justification for exempting the refuel surveillance interval from the 3.25 criteria of Technical Specification 4.0.2.b (Reference (b)).

Deletion of the requirement "any three consecutive intervals must not exceed 3.25 times the interval" will not significantly effect equipment reliability. The current criteria allows a 22.5 month interval for as many as two intervals during a three interval period. Deletion of 3.25 criteria will allow all three intervals to be 22.5 months long. Per specification 4.0.2.a, the staff has already accepted that a 22.5 month interval will provide a sufficient level of protection. Allowing this interval to be applied to all cycles will maintain a constant level of protection.

Technical specifications requiring surveillance interval extension fall into the following categories:

Functional Tests

These tests are divided into the following categories:

- a) Logic System Functional Test (LSFT)
- b) Channel Functional Test (CFT)

A LSFT is a test of all logic component associated with the system (from sensor to system actuation) to demonstrate the system functions as designed. An example of this is the testing for the Unit 2 Diesel Generator Cooling Water Subsystem in the Unit 1 Technical Specification 4.7.1.2. This surveillance assures that the Unit 2 Diesel Generator cooling water pump starts when a start signal is received for the 2A Diesel Generator.

A CFT is a test which injects a signal into the logic channel to simulate a sensor trip and verify proper operation of the remaining portion of the trip channel.

There is no safety significance to delaying these tests for a short period of time. All of the affected systems have functional tests and/or calibrations which have been tested within their Technical Specification surveillance frequency. These functional tests or calibrations verify operability of the instrumentation and/or components of which the logic system is a part. In many cases these tests cover the majority of the logic system. 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.

Leak Rate Test

A test performed to verify that the leakage through valves is less than the value assumed in the system design.

Guidance is provided in Appendix J for primary reactor containment leakage testing which allows 2 years between tests. In addition to the requirements of 10 CFR 50 Appendix J, valve leak tests are specified in the Technical Specifications 3/4 4.3.2 to monitor leakage at high/low pressure interfaces. Technical Specification 4.0.2.A will be satisfied for all required tests even with the relief requested. Since this is less than 24 months, all Appendix J requirements will be met.

Other Tests

Flow Test

A test performed to demonstrate a system can pump to its design destination.

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 complete flow path to the reactor vessel.

Electrical Power Tests

Tests performed on diesels to demonstrate that they are capable of performing their design functions.

These test are performed while shutdown during refueling. They are included in the testing program to ensure periodically that certain functions have not degraded. These tests include logic testing, preventative maintenance, etc. The diesel generators are verified to be operable while the units are in operation by performing several surveillances required by technical specifications. These tests ensure that the diesel will start, will accept load and has available such auxiliaries as necessary.

This surveillance requirement will also require a change to the Unit 1 Technical Specifications since Unit 2 Division 2 operability is specified for Unit 1 electrical power system availability.

Response Time Test

A test performed to verify the time delay incurred for a protective action on a particular system or instrument channel. The time delay is measured as the interval from the monitored parameter exceeding its trip setpoint at the channel sensor to the desired system/channel response.

CONCLUSION

Based on the above discussion Commonwealth Edison is requesting that Unit 1 and Unit 2 Technical Specification 4.0.2.b be amended to indicate that the 3.25 criteria is not applicable to refuel interval surveillances for Unit 2 cycle 2 (see Attachment B). This amendment request will alleviate an immediate problem and help to prevent a shutdown of Unit 2 due to time restrictions placed on refuel interval surveillances by the 3.25 criteria.

Unit 2 performance has been exemplary since startup on June 16, 1987. Additionally shutdown of Unit 2 at the same time of a Unit 1 outage would result in competition for critical resources which would diminish the planning and scheduling effectiveness as well as increase the demand for key manpower.

ATTACHMENT B

PROPOSED CHANGES TO
THE TECHNICAL SPECIFICATIONS FOR
OPERATING LICENSES NPF-11 AND NPF-18

REVISED PAGES:

<u>NPF-11</u>	<u>NPF-18</u>
3/4 8-4	3/4 0-2