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February 18, 2000

United States Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D.C. 20555

LaSalle County Station, Unit 2
Facility Operating License No. NPF-18
NRC Docket No. 50-374

Subject: Request for Enforcement Discretion Concerning Performance
of an Augmented Examination of Weld RH-2005-29

The purpose of this letter is to docket a request by Commonwealth Edison (ComEd) Company for Enforcement Discretion from compliance with LaSalle County Station (LaSalle) Unit 2, Technical Specification (TS) 3.4.8, "Structural Integrity", by changing TS Surveillance Requirement 4.0.5.f to allow deferral of an augmented weld examination. Enforcement discretion is being sought until approval of an exigent license amendment request that will allow continued operation of Unit 2 by deferring the required augmented inspection of Weld RH-2005-29 until the next refueling outage.

TS Section 3.4.8 requires the structural integrity of American Society of Mechanical Engineers (ASME) Class 1 components to be maintained in accordance with the surveillance requirements of TS 4.4.8. TS 4.4.8 invokes the surveillance requirements of TS 4.0.5. TS 4.0.5.f requires that piping susceptible to intergranular stress corrosion cracking (IGSCC), be examined in accordance with the NRC staff positions on schedule, methods, personnel and sample expansion included in NRC Generic Letter 88-01.

At 1527 hours Central Standard Time (CST) on February 17, 2000, TS Surveillance Requirement (SR) 4.0.3 was entered due to a missed TS surveillance requirement allowing 24 hours to pursue enforcement discretion. Without enforcement discretion, at 1527 hours CST, on February 18, 2000, LaSalle County Station Unit 2 will be required to be in at least STARTUP within the next 7 hours, HOT SHUTDOWN within in the following 6 hours and COLD SHUTDOWN within the subsequent 24 hours, in accordance with Limiting Condition for Operation (LCO) 3.0.3.

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The attached enclosure provides the following information necessary for approval of the requested enforcement discretion:

- Description of the requirement for which enforcement discretion is sought;
- Circumstances surrounding the situation, including root causes, the need for prompt action and relevant historical background;
- The safety basis for the request, including an evaluation of the safety significance and potential consequences including risk assessment of the proposed action;
- Basis for determining that the noncompliance will not be of potential detriment to the public health and safety and that no unreviewed safety question or significant hazard consideration is involved;
- Basis for concluding that the request does not involve adverse consequences to the environment;
- Proposed compensatory actions;
- Justification for the duration of the request;
- Acknowledgment of Plant Operations Review Committee approval;
- Basis for concluding that the Notice of Enforcement Discretion Criteria of NUREG-1600 are satisfied;
- Marked up Technical Specification pages; and,
- Other supporting information.

This request was verbally transmitted to members of the NRC staff on Friday, February 18, 2000, at 0945 hours CST, with subsequent approval being verbally granted at 1130 hours CST.

The exigent license amendment request will be submitted to the NRC by the close of business on February 22, 2000.

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Should you have any questions concerning this letter, please contact
Mr. Frank A. Spangenberg, III, Regulatory Assurance Manager, at
(815) 357-6761, extension 2383.

Respectfully,

A handwritten signature in black ink, appearing to read "Jeffrey A. Benjamin". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Jeffrey A. Benjamin
Site Vice President
LaSalle County Station

Enclosure

cc: Regional Administrator - NRC Region III
NRC Senior Resident Inspector - LaSalle County Station

ENCLOSURE

LASALLE COUNTY STATION

**REQUEST FOR ENFORCEMENT DISCRETION CONCERNING PERFORMANCE OF
AN AUGMENTED EXAMINATION OF WELD RH-2005-29**

FACILITY OPERATING LICENSE NPF-18

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LASALLE COUNTY STATION UNIT 2 REQUEST FOR ENFORCEMENT DISCRETION CONCERNING PERFORMANCE OF AN AUGMENTED EXAMINATION OF WELD RH-2005-29

1. DESCRIPTION OF THE TECHNICAL SPECIFICATION REQUIREMENT OR LICENSE CONDITION FOR WHICH ENFORCEMENT DISCRETION IS SOUGHT

Technical Specification (TS) Section 3.4.8, "Structural Integrity," requires that the structural integrity of ASME Code Class 1, 2 and 3 components be maintained in accordance with Specification 4.4.8. Specification 4.4.8 in turn requires no additional surveillance requirements other than those required by TS Surveillance Requirement (SR) 4.0.5.

TS 4.0.5.f requires that the inservice inspection program for piping identified in NRC Generic Letter 88-01 be performed in accordance with the NRC staff positions on schedule, methods, personnel, and sample expansion included in Generic Letter 88-01 or in accordance with alternate measures approved by the NRC staff.

It has been determined that a required weld examination was not conducted in accordance with the required interval required by our Augmented Inspection Program required by Generic Letter 88-01, "NRC Position on IGSCC in BWR Austenitic Stainless Steel Piping". This constitutes a missed Surveillance requirement. This would necessitate entry into TS 3.4.8, Action A for Class I piping that requires restoration of the structural integrity of the affected component(s) to within its limit or isolate the affected component(s) prior to increasing the Reactor Coolant system temperature more than 50 °F above the minimum temperature required by NDT considerations. Since the Unit is currently at a temperature in excess of this requirement, the action statement can not be complied with and entry into LCO 3.0.3 is required.

LCO 3.0.3 requires that within 1 hour action shall be initiated to place the unit in an operational condition in which the Specification does not apply by placing the unit in at least STARTUP within the next 6 hours, HOT SHUTDOWN within the following 6 hours and be in COLD SHUTDOWN within the subsequent 24 hours.

Since LCO 3.0.3 provides actions to place the unit in a shutdown condition in a time less than 24 hours, SR 4.0.3 was applied due to a missed TS surveillance requirement allowing 24 hours to pursue enforcement discretion.

Therefore, LaSalle County Station is requesting Enforcement Discretion from compliance with LaSalle County Station (LaSalle) Unit 2, Technical Specification (TS) 3.4.8, "Structural Integrity", by changing TS Surveillance Requirement 4.0.5.f to allow deferral of an augmented weld examination.

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The 24-hour time clock of TS 4.0.3 will expire on February 18, 2000, at 1527 hours CST. At the expiration of this time clock, TS 3.0.3 will require placing LaSalle County Station Unit 2 in a COLD SHUTDOWN condition. Enforcement discretion is being sought that will allow continued operation of Unit 2 by deferring the required augmented inspection of Weld RH-2005-29 until the next refueling outage. The duration of the requested enforcement discretion is until NRC approval of the exigent license amendment request to include the proposed footnote below and until implementation of the license amendment, within 15 days of issuance by the NRC.

The specific proposed changes to TS 4.0.5.f are to add footnote *:

* "Augmented examination of weld RH-2005-29, per approved program, will be deferred until the next scheduled refueling outage, L2R08, or December 31, 2000, whichever is earlier."

2. **CIRCUMSTANCES SURROUNDING THE SITUATION, INCLUDING ROOT CAUSES, THE NEED FOR PROMPT ACTION AND RELEVANT HISTORICAL BACKGROUND**

During a review of historical Intergranular Stress Corrosion Cracking (IGSCC) weld examination data, including Inductive Heat Stress Improvement (IHSI) data, and Mechanical Stress Improvement (MSIP) records, a clerical error was discovered involving two IGSCC susceptible welds in the Unit 2 "A" Residual Heat Removal (RHR) Shutdown Cooling return piping. This piping is 12" diameter and is fabricated from Type 304 austenitic stainless steel. The pipe is welded to a cast austenitic stainless steel valve. The two welds involved are RH-2005-28 & RH-2005-29, which connect the upstream piping and downstream elbow to valve 2E12-F090A, "A RHR SDC Return Header Manual Stop Valve." No weld repair activities have been performed on these two welds. The carbon content of valve 2E12-F090A is 0.04%, and the delta ferrite was determined to be greater than 18 FN.

IHSI records of 1983 depicted these two welds at different physical locations than the Inservice Inspection drawings. Therefore, the stress relief that was believed to have been applied to these two welds was actually applied to welds RH-2005-30 & RH-2005-33. This error went undetected, and in 1987 when the remaining balance of the IGSCC weld population was subjected to the MSIP process, it was believed that welds RH-2005-28 & 29 had already been stress relieved in 1983. Consequently, the two welds have never been subjected to any stress improvement process.

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Based on having no stress improvement, these two welds should have been categorized as IGSCC Category D, vice Category B, in accordance with NRC Generic Letter 88-01. The examination schedule for Category D welds would have required that the two welds be examined every two refueling cycles beginning with L2R02. The subject welds should have been examined during the 3rd, 5th, and 7th refueling outages. Examinations of weld RH-2005-28 were not completed during the 3rd or 5th refueling outages, but the weld was examined in the 7th refueling outage with no indication of cracking noted. Weld number RH-2005-29 was examined in the 3rd refueling outage with no indication of cracking noted, but was not re-examined during the 5th or 7th refueling outages as required by ComEd's augmented inspection program required by Generic Letter 88-01.

The weld inspections conducted on these two welds were done in accordance with ComEd's approved augmented inspection program; in that they were performed using approved procedures, by EPRI qualified individuals.

The schedule of examinations for welds RH-2005-28 & 29 has not been executed in accordance with the Category D schedule in the Generic Letter. This error does not affect the selection process for normal ASME Section XI welds because that selection process does not depend on the application of any stress improvement processes.

3. **EVALUATION OF THE SAFETY SIGNIFICANCE AND POTENTIAL CONSEQUENCES INCLUDING RISK ASSESSMENT OF THE PROPOSED ACTION**

ComEd is requesting a Notice of Enforcement Discretion (NOED) from Technical Specifications (TS) be issued in order to avoid placing LaSalle County Station Unit 2 in a shutdown condition, and cycling the unit through a thermal transient. The integrity of the reactor vessel and other components of the primary system of a nuclear plant can be adversely affected by the number of thermal transients that they are subjected to during their lifetime. As each additional thermal transient can affect this integrity, it is prudent to avoid such transients provided the health and safety of the public is preserved. Enforcement discretion is being sought to grant a temporary change to TS 4.0.5.f to relieve the requirement to demonstrate the operability of all ASME code class components. This allows TS 3.0.3 to be exited and thus permit continued operation of LaSalle County Station Unit 2.

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Weld RH-2005-29 is a valve-to-pipe weld and is required to be considered as a Category D weld per Generic Letter 88-01. Category D welds are those made of susceptible material and have not received an IGSCC mitigation treatment. As noted in BWRVIP-75 (EPRI TR-113932), "BWR Vessel and Internals Project, Technical Basis for Revisions to Generic Letter 88-01 Inspection Schedules," industry experience for Category D welds has been excellent. The technical basis for extending weld examination frequencies from every other refuel cycle to once every 6 years states:

"In the 33 plants that responded to the survey, there are currently 432 Category D welds that have been examined 1325 times. There are 169 welds currently being effectively treated with Hydrogen Water Chemistry (HWC). There has been one known Category D weld reported to be cracked in the last 8 years. The one known crack was detected at Hope Creek in 1997. The cracking (three pinholes) occurred in a dissimilar weld at a safe-end to nozzle with nickel-based alloy 182. The owner determined that this weld had experienced multiple repairs. Other than this weld repair, no other Category D cracking has been reported."

Weld RH-2005-29 is not a dissimilar metal weld; it involves only stainless steel base and weld metal.

Early industry experience revealed that small-bore, thin-wall pipe would develop IGSCC flaws early in life. This has been attributed to higher weld residual stresses (near yield) in thin-wall pipe. Also since through-wall weld residual stresses are higher in thin-walled pipe, flaws would be expected to grow faster. This is corroborated by the large number of welds in 4" – 12" piping in the BWR fleet that required Weld Overlay repairs early in life. Consequently, if this weld were going to crack, it probably would have done so prior to the examination conducted in 1990.

A review of the LaSalle Station Unit 2 reactor water chemistry program reveals that it has been maintained in accordance with NOD-CY-02, "BWR Water Chemistry Control Program." This procedure is based on the guidance given in EPRI TR-103515-R1, dated December 1996. Reactor water chemistry was maintained within EPRI guidelines 93.7% of the time since the last inspection of this weld in 1990. When a non-standard condition developed, the EPRI guidelines were followed to restore chemistry to normal operating parameters. Based on a review of reactor water chemistry for sulfate and chloride data over the past 10 years of operation on LaSalle Unit 2, the most notable

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chemistry transient during power operation occurred during January 1996 with a peak sulfate of 74 parts per billion (ppb). The transient was due to a small ingress of resin and reactor sulfates were reduced to less than 20 ppb in less than 24 hours.

The weld on the opposite side of the valve, RH-2005-28, is also a Category D weld. Its operating environment is similar to that for RH-2005-29. Weld RH-2005-28 was inspected in 1987 and again in 1996 with no recordable indications. It is reasonable to postulate that weld RH-2005-29 has behaved similarly and is therefore not expected to be flawed.

If the foregoing argument should prove to be wrong due to weld-unique conditions (e.g., weld fit-up problem, ID grinding, etc.) and the weld is actually flawed, safety is still not jeopardized. Austenitic stainless steel is a tough and ductile material and flaw tolerant. Additionally, IGSCC has an irregular crack form. These attributes lead to the conclusion that this piping will leak before it breaks. This "leak before break" approach is well accepted by the industry. EPRI report NP-4991, "Application of the Leak-before-Break Approach to BWR Piping," provides supporting information. A plant-specific critical flaw evaluation was performed to assess the weld using the loads from the LaSalle stress reports. The results are bounded by the EPRI report NP-4991. The conclusion to be drawn is that if weld RH-2005-29 is flawed, and should the flaws propagate through the wall of the pipe, it will create a leak that would be readily detected by reactor coolant system leakage detection instrumentation well in advance of the pipe break and the unit can be shutdown with no significant impact on safety.

Additionally, a risk assessment was performed as part of a defense-in-depth evaluation of weld RH-2005-29. The analysis included the following:

1. Estimate the nominal pipe rupture frequency of a routinely inspected weld.
2. Identify the conditions at the time of the last inspection in 1990.
3. Estimate the relative increase in pipe rupture frequency incurred due to the missed inspections.
4. Calculate the conditional probability of core damage and large early release given a break in the line.
5. Estimate the risk of continued operation.
6. Evaluate competing risks associated with plant shutdown to perform inspection.

The risk assessment is based on the latest LaSalle plant-specific PSA for internal events and the EPRI sponsored piping reliability Markov model developed for risk-informed inservice inspection assessment.

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The results using this information indicate that the risks of continued operation is low:

- Core Damage Frequency (CDF) $\cong 5 \times 10^{-9}$ /year
- Large Early Release Frequency (LERF) $\cong 7 \times 10^{-11}$ /year

These values are well below the risk increase thresholds considered acceptable for permanent plant changes as delineated in Regulatory Guide 1.174.

The competing risks associated with alternative actions involve shutting down the reactor for a forced outage have been evaluated as part of the LaSalle internal events PSA and is estimated to be approximately 2×10^{-7} /manual shutdown, which is factor of approximately 40 times higher than the risk of continued operation with weld RH-2005-29 uninspected until Fall 2000.

The extent of condition has been reviewed in depth and this is the only weld that has not had required inspections performed. In addition, it has been verified that these two welds were the only LaSalle Unit 1 or Unit 2 welds defined as susceptible to IGSCC per GL 88-01 that did not receive stress improvement by either IHSI or MSIP.

4. BASIS FOR DETERMINING THAT THE NONCOMPLIANCE WILL NOT BE OF POTENTIAL DETRIMENT TO THE PUBLIC HEALTH AND SAFETY AND THAT NO SIGNIFICANT HAZARDS CONSIDERATION IS INVOLVED.

ComEd has also evaluated this request for enforcement discretion and determined that it involves no Significant Hazards Considerations. According to 10CFR50.92(c) a request is determined to involve no significant hazard consideration if operation of the facility in accordance with the proposed request would not:

- 1) Involve a significant increase in the probability of occurrence or the consequences of an accident previously evaluated; or
- 2) Create the possibility of a new or different kind of accident from any accident previously evaluated; or
- 3) Involve a significant reduction in a margin of safety.

The proposed change adds a footnote to SR 4.0.5.f that allows the deferral of the augmented weld examination of RH-2005-29 until the upcoming Unit 2 refueling outage.

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The proposed Enforcement Discretion does not involve a significant increase in the probability of occurrence or consequences of an accident previously evaluated.

The proposed change represents a minimal increase in the probability of a pipe break resulting in a Loss of Coolant Accident (LOCA). The proposed changes will not impact the source terms used in the derivation of the LOCA dose consequences. Therefore the consequences will remain unchanged since the resulting LOCA is bounded by current analysis.

Therefore the proposed change does not involve a significant increase in the probability of occurrence or consequence of an accident previously evaluated.

The proposed Enforcement Discretion does not create the possibility of a new or different kind of accident from any accident previously evaluated.

The proposed change does not introduce a new mode of plant operation and does not involve a physical modification to the plant. The proposed change does not introduce a new failure mode.

Therefore, the proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

The proposed Enforcement Discretion does not involve a significant reduction in a margin of safety.

Since the Emergency Core Cooling System-LOCA analysis remains unchanged, the fuel-cladding margin, expressed as Peak Centerline Temperature, is not affected. The change does not impact the Reactor Coolant Pressure Boundary Overpressure Analysis; therefore the margin of safety for the Reactor Coolant Pressure Boundary is not affected. The blowdown energy, resulting from a LOCA and the ability of the suppression chamber to maintain the margin of safety of the containment barrier are not affected.

Therefore, the changes do not involve a significant reduction in the margin of safety.

Therefore, based on the above evaluation, ComEd has concluded that this request for enforcement discretion does not involve a significant hazards consideration.

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5. BASIS FOR CONCLUDING THAT THE REQUEST DOES NOT INVOLVE ADVERSE CONSEQUENCES TO THE ENVIRONMENT

ComEd has evaluated this requested enforcement discretion against the criteria for identification of licensing and regulatory actions requiring environmental assessment in accordance with 10 CFR 51.21. It has determined that this requested action meets the criteria for a categorical exclusion set forth in 10 CFR 51.22(c)(9) and as such, has determined that no irreversible consequences exist in accordance with 10 CFR 50.92(b). This determination is based on the fact that this change is being proposed as enforcement discretion, to a license issued pursuant to 10 CFR 50 that reflects a requirement with respect to the use of a facility component located within the restricted area, as defined in 10 CFR 20, and the action meets the following specific criteria:

- (i) The proposed action involves no significant hazards consideration as demonstrated in Section 4 of this submittal.
- (ii) There is no significant change in the types or significant increase in the amounts of any effluent that may be released offsite. The proposed action does not affect the generation of any radioactive effluent.
- (iii) There is no significant increase in individual or cumulative occupational radiation exposure. The proposed action will not change the level of controls or methodology used for processing of radioactive effluents or handling of solid radioactive waste, nor will the proposed action result in any change in the normal radiation levels within the plant.

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6. PROPOSED COMPENSATORY ACTIONS

There are will be no specific compensatory actions other than our requirements of TS 3/4.4.3, "Reactor Coolant System Leakage."

Section 5.2.5 of the LaSalle County Station Safety Evaluation Report (NUREG 0519) provides an outline of the leak detection system. The conclusion that was reached in the SER was that the system provides reasonable assurance that small leaks across the reactor coolant system boundary, can be detected, as required by Criterion 30 of the General Design Criteria and Regulatory Guide 1.45.

The sump fill-up rate in the primary containment (unidentified leakage) is continuously monitored by chart recorders. The fill-up rate indication is recorded every four hours and is compared to the previous 24 hours of readings to determine if the 2 gpm increase in 24 hours limitation is being exceeded. An alarm sounds in the control room when the sump fill-up rate approaches the 5 gpm limitation.

An alarm sounds in the control room when the sump pump starts, alerting the operator to potentially changing plant conditions. The sump pump discharge flow meter totalizer is recorded every four hours, and the leakage rate is monitored by this method also.

Both of these indicators on LaSalle County Station Unit 2 are operating properly. Neither instrument has any corrective or overdue preventative work requests outstanding. Trending of these indicators shows that the current cycle unidentified leakage in Unit 2 primary containment has been very steady at about 0.1 gpm. Any increase in this rate would be readily apparent to the control room operators and system engineer.

The combined condensate flow from the drains of the drywell coolers activates an alarm if 2 gpm is indicated. This indication is recorded every four hours also. This indication has also been working well on Unit 2.

In addition, the primary containment Continuous Airborne Monitors (CAMs), panels 2PL15J and 2PL75J, provide redundant indications of particulate and noble gas radioactivity that will also provide early indication of increased reactor coolant system leakage.

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7. JUSTIFICATION FOR THE DURATION OF THE REQUEST

ComEd has determined that there is a minimal safety consequence involved with deferring the augmented examination of weld RH-2005-29 until the next refueling outage, L2R08, or December 31, 2000, whichever is earlier.

- Based on BWRVIP-75 (EPRI TR-113932) as stated in section 3, above, there has been only one known Category D weld reported cracked in the last 8 years, and it was in a dissimilar weld a safe-end to nozzle with nickel-based alloy 182. Weld RH-2005-29 is not a dissimilar metal weld; it involves only stainless steel base and weld metal.
- The weld on the opposite side of the valve, RH-2005-28, is also a Category D weld. Its operating environment is similar to that of RH-2005-29. Weld RH-2005-28 was inspected in 1987 and again in 1996 with no recordable indications.
- Leak detection instrumentation will detect an increase to unidentified leakage and the limits of TS 3.4.3.2, "Reactor Coolant System – Operational Leakage", will assure that unit shutdown would be required prior to the leakage exceeding critical crack leakage for this line, per TS 3/4.4.3 Bases.
- A risk assessment was performed, as described in section 3 above, that indicates that the risk of continued operation is low:
 - Core Damage Frequency (CDF) $\cong 5 \times 10^{-9}$ /year
 - Large Early Release Frequency (LERF) $\cong 7 \times 10^{-11}$ /year

The extent of condition has been reviewed in depth and this is the only weld that has not had required inspections performed. In addition, it has been verified that these two welds were the only LaSalle Unit 1 or Unit 2 welds defined as susceptible to IGSCC per GL 88-01 that did not receive stress improvement by either IHSI or MSIP.

Therefore, safety significance of deferring the augmented examination of weld RH-2005-29 until approval and implementation of the proposed exigent license amendment request to change the TS is minimal.

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8. ACKNOWLEDGEMENT OF PLANT OPERATIONS REVIEW COMMITTEE APPROVAL

This request has been reviewed and approved by the LaSalle County Station Plant Operations Review Committee (PORC) to meet the requirements of station administrative procedures.

9. BASIS FOR CONCLUDING THAT THE NOED CRITERIA OF NUREG-1600 ARE SATISFIED

ComEd has evaluated the requested enforcement discretion against the criteria specified in NUREG-1600. It has been determined that the requested actions meet the NOED criteria for an operating plant. This determination is based on avoidance of an undesirable transient caused by the shutdown of the reactor as a result of forcing compliance with the Technical Specifications and, thus, minimizes potential safety consequences and operational risks associated with a plant shutdown.

10. MARKED-UP TECHNICAL SPECIFICATION PAGES IDENTIFYING PROPOSED CHANGES (IF APPLICABLE)

The marked up pages are attached.

11. OTHER SUPPORTING INFORMATION

No other supporting information is provided for this NOED.

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**LASALLE COUNTY STATION UNIT 2 REQUEST FOR ENFORCEMENT DISCRETION
CONCERNING PERFORMANCE OF AN AUGMENTED
EXAMINATION OF WELD RH-2005-29**

ATTACHMENT

Marked-up Technical Specification Pages

APPLICABILITY

SURVEILLANCE REQUIREMENTS (Continued)

- c. The provisions of Specification 4.0.2 are applicable to the above required frequencies for performing inservice inspection and testing activities.
- d. Performance of the above inservice inspection and testing activities shall be in addition to other specified Surveillance Requirements.
- e. Nothing in the ASME Boiler and Pressure Vessel Code shall be construed to supersede the requirements of any Technical Specification.
- f. The inservice inspection program for piping identified in NRC Generic Letter 88-01 shall be performed in accordance with the NRC staff positions on schedule, methods, personnel, and sample expansion included in Generic Letter 88-01 or in accordance with alternate measures approved by the NRC staff.



**Augmenting examination of weld RH-2005-29, per the approved program, will be deferred until the next scheduled refueling outage, L2RO8, or December 31, 2000, whichever is earlier.*