Commonwealth Edison Company
LaSalle Generating Station
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ComEd

March 31, 2000

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

LaSalle County Station, Units 1 and 2
Facility Operating License Nos. NPF-11 and NPF-18
NRC Docket Nos. 50-373 and 50-374

Subject: Response to Request for Additional Information License Amendment Request for Power Uprate Operation

Reference: Letter from R. M. Krich (Commonwealth Edison (ComEd) Company) to U.S. NRC, "Request for License Amendment for Power Uprate Operation," dated July 14, 1999.

In the referenced letter, pursuant to 10 CFR 50.90, "Application for Amendment of License or Construction Permit," Commonwealth Edison (ComEd) Company proposed to operate both LaSalle County Station Units at an "uprate" power level of 3489 Megawatts Thermal (MWT). During a conference call on March 8, 2000, the NRC requested additional information concerning the proposed amendment request to support their review. The attachment to this letter provides our partial response to the request for additional information.

This response provides answers to the NRC question concerning Motor Operated Valves and Air Operated Valves. The answer to the remaining question regarding the Probabilistic Safety Analysis (PSA) of operator actions will be delayed because the supporting analyses are not yet complete. ComEd will provide the response to the remaining question raised in the conference call of March 8, 2000, by April 7, 2000.

A001

The no significant hazards consideration submitted in the referenced letter remains valid for the information attached.

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,

Charles G. Pardee
Site Vice President
LaSalle County Station

Attachment

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

STATE OF ILLINOIS)

IN THE MATTER OF)

COMMONWEALTH EDISON COMPANY)

LASALLE COUNTY STATION - UNIT 1 & UNIT 2) Docket Nos. 50-373
50-374

Subject: Response to Request for Additional Information License Amendment Request for Power Uprate Operation

AFFIDAVIT

I affirm that the content of this transmittal is true and correct to the best of my knowledge, information and belief.

Charles G. Pardee
Site Vice President
LaSalle County Station

Subscribed and sworn to before me, a Notary Public in and for the State above named, this 30th day of March, 2000.
My Commission expires on 10-1, 2000.

OFFICIAL SEAL
DEBRA J. FEENEY
NOTARY PUBLIC, STATE OF ILLINOIS
MY COMMISSION EXPIRES10-1-2000

Debra J. Feeney
Notary Public

Attachment
Response to Request for Additional Information

Question 1:

In reference to Section 4.1.4, provide the identified valves whose operating conditions have changed due to power uprate conditions. Confirm that all safety-related valves including MOVs and AOVs will be capable of performing their intended function(s) following the power uprate including such affected parameters as fluid flow, temperature, pressure and differential pressure, and ambient temperature conditions. Please also state the impact of the power uprate on the LaSalle's existing analyses for responses to Generic Letter 95-07 regarding pressure locking and thermal binding for MOVs and to Generic Letter 96-06 regarding the potential over-pressurization of isolated piping segments at LCS. Identify mechanical components for which functionality at the uprated power level could not be confirmed, and provide proposed physical modifications or reanalyses, if necessary.

Response 1:

All safety related motor-operated valves (MOVs) covered under LaSalle's MOV program have been reviewed for the effects of power uprate conditions, including pressure locking and thermal binding addressed in Generic Letter 95-07, "Pressure Locking and Thermal Binding of Safety-Related Power-Operated Gate Valves." All safety related MOVs were evaluated for changes in process conditions including fluid flow, temperature, pressure and differential pressure. There were no changes to the ambient conditions assumed for environmental qualification of equipment.

The reactor operating pressure and temperature are not changed; therefore, for all isolation valves connected to the RPV, the pressure against which the valve must close is not changed. The design process parameters for the other safety related systems are not changed by power uprate. However, for each unit, reactor steam flow to the turbine generator and reactor feedwater flow did increase as a result of power uprate.

The MOVs affected by the increased feedwater flow are 1(2)B21-F065A, 1(2)B21-F065B and 1(2)G33-F040. These manually operated MOVs are closed for long term containment integrity following loss of feedwater flow to the reactor vessel. The differential pressures assumed in the existing design basis for these valves remains unchanged following power uprate.

The main steam isolation valves, 1(2)B21-F022A, B, C, D and 1(2)B21-F028A, B, C, D, were evaluated for the increase in steam flow and determined to be acceptable.

The MOVs and air-operated valves (AOVs) which are subject to containment pressure, which increased from 39.6 to 39.9 psig, were reviewed. This review confirmed that these valves are capable of operating at a minimum containment pressure of 39.9 psig.

The power uprate analyses have concluded the long term peak suppression pool post-accident temperature is lower than the previously analyzed value (NEDC-32701P, Table 4-1) and the peak drywell temperature of 340 °F remains unchanged (NEDC-32701P, section 4.1.1.2). Accordingly, MOV operation associated with Generic Letter 95-07 is evaluated as not impacted by power uprate.

Generic Letter 96-06, "Assurance of Equipment Operability and Containment Integrity During Design-Basis Accident Conditions," relates to post accident over-pressurization of the volume between containment isolation valves. The acceptability of LaSalle with respect to the concerns of Generic Letter 96-06 was previously resolved by either modifying the system by adding a relief valve, bypass check valve, valve disc pressure relief vent hole, or by qualifying the existing lines by analysis. An evaluation has confirmed that power uprate will not impact the ability of the modifications to ensure over-pressurization protection of the volume between the containment isolation valves. The existing temperature profiles assumed in the line analysis were also confirmed to be valid for power uprate. The evaluation concluded that power uprate does not impact the results of the analysis or the system ability to withstand the event postulated in Generic Letter 96-06.

Based on the information above, the mechanical components were confirmed to remain functional at the uprated power level. Therefore, there are no physical modifications or re-analyses required for power uprate.