



Commonwealth Edison
One First National Plaza, Chicago, Illinois
Address Reply to: Post Office Box 767
Chicago, Illinois 60690 - 0767

December 15, 1989

Dr. Thomas E. Murley, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Subject: LaSalle County Station Units 1 and 2
Application for Amendment to Facility
Operating License NPF-11 and NPF-18:
Clarification of General Requirements
for Application to Technical Specification
LCOs and Surveillance Requirements
NRC Docket Nos. 50-373 and 50-374

Reference (a): NRC Generic Letter 87-09 dated June 4,
1987.

Dear Dr. Murley:

Pursuant to 10 CFR 50, Commonwealth Edison is hereby applying for an amendment to Facility Operating Licenses NPF-11 and NPF-18, Appendix A, Technical Specifications. The purpose of this amendment is to clarify the intent of Technical Specifications 3.0 and 4.0 in order to help achieve consistent application of these specifications. This proposed amendment is submitted in accordance with guidance given in Reference (a).

Attachment A contains background information and justification for the proposed change. Attachment B contains the proposed changes to the Technical Specifications. The proposed changes have been reviewed and approved by both On-Site and Off-Site Review in accordance with Commonwealth Edison Company procedures. This amendment request has been evaluated in accordance with 10 CFR 50.92(c) and it was determined that no significant hazards consideration exists. That evaluation is documented in Attachment C.

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Commonwealth Edison is notifying the State of Illinois of our application for amendment by transmitting a copy of this letter and its attachments to the designated State Official.

Please direct any questions you may have regarding this matter to this office.

Very truly yours,

Wayne E Morgan

W.E. Morgan
Nuclear Licensing Administrator

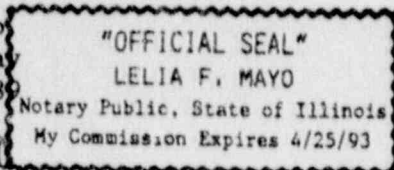
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Attachments

cc: A.B. Davis - Regional Administrator, RIII
P.C. Shemanski - Project Manager, NRR
Senior Resident Inspector - LSCS
Office of Nuclear Facility Safety - IDNS

SUBSCRIBED AND SWORN to
before me this 15th day
of December, 1989

Lelia F. Mayo
Notary Public



ATTACHMENT A

TECHNICAL SPECIFICATION CHANGE REQUEST

LASALLE COUNTY STATION UNITS 1 AND 2

BACKGROUND

The NRC, in conjunction with the Atomic Industrial Forum (AIF), has been working on a program for Technical Specification improvements. As part of this program, the NRC issued Generic Letter 87-09 (Reference (a)). This document addressed implementation of short-term improvements to resolve immediate concerns which have arisen from the NRC/AIF investigations. The Generic Letter addressed three specific problems that have been encountered with Sections 3.0 and 4.0 of the Standard Technical Specifications (STS). The sections provide the general requirements for the application of the Limiting Conditions for Operation (LCO) and the surveillance requirements contained in the plant Technical Specifications.

Additionally, addressed in the Generic Letter are recommendations for changes to the Technical Specification bases for Specifications 3.0 and 4.0. These recommendations clarify the intent of Specifications 3.0 and 4.0 and help to achieve consistency throughout the Technical Specifications.

In accordance with the guidance recommended in Generic Letter 87-09, Commonwealth Edison LaSalle County Station submits the following amendment request.

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>
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3/4 0-2	3/4 0-2
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3/4 1-6	3/4 1-6
3/4 1-8	3/4 1-8
3/4 1-9	3/4 1-9
3/4 1-11	3/4 1-11
3/4 1-14	3/4 1-14
3/4 1-16	3/4 1-16
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3/4 3-9	3/4 3-9
3/4 3-27	3/4 3-27
3/4 3-40	3/4 3-39
3/4 3-56	3/4 3-57
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3/4 3-63	3/4 3-63
3/4 3-73	3/4 3-73

REVISED PAGES: (Cont'd)

NPF-11

NPF-18

3/4 3-75	3/4 3-75
3/4 3-81	3/4 3-81
3/4 3-86	3/4 3-86
3/4 3-91	3/4 3-91
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3/4 4-10	3/4 4-11
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3/4 6-5	3/4 6-5
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REVISED PAGES: (Cont'd)

NPF-11

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NPF-18

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ATTACHMENT C

SIGNIFICANT HAZARDS CONSIDERATION

Commonwealth Edison has evaluated the proposed Technical Specification Amendment and determined that it does not represent a significant hazards consideration. Based on the criteria for defining a significant hazards consideration established in 10 CFR 50.92, operation of LaSalle County Station Units 1 and 2 in accordance with the proposed amendment will not:

- (1) Involve a significant increase in the probability or consequences of an accident previously evaluated because:

The proposed amendments are administrative in nature and are intended to provide the plant operators with more guidance for application of the requirements of Technical Specification 3/4.0. These clarifications will help to ensure that the plant is operated within Technical Specification limitations, and help to prevent unnecessary plant shutdowns. This proposal does not affect the evaluation for any accident presented in Chapter 15 of the UFSAR.

- (2) Create the possibility of a new or different kind of accident from any accident previously evaluated because:

This proposal does not involve any changes; to the facility, or to the operation of the facility.

- (3) Involve a significant reduction in the margin of safety because:

The guidance provided in this proposed amendment will help to ensure consistent interpretation of the Technical Specifications by the plant operators. This will in turn help to ensure that the plant is operated within Technical Specification limitations.

Guidance has been provided in 51 FR 7744 (Reference (a)), for the application of standards to license change requests for determination of the existence of significant hazards considerations. This document provides examples of amendments which are and are not considered likely to involve significant hazards considerations. This proposal most closely resembles the example of an administrative change. This proposed amendment does not involve a significant relaxation of the criteria used to establish safety limits, a significant relaxation of the bases for the LCOs. Therefore, based on the guidance provided in the Federal Register and the criteria established in 10 CFR 50.92(e), the proposed change does not constitute a significant hazards consideration.

INSERT A

- 3.0.4 Entry into an OPERATIONAL CONDITION or other specified CONDITION shall not be made when the conditions for the Limiting Conditions for Operations are not met and the associated ACTION requires a shutdown if they are not met within a specified time interval. Entry into an OPERATIONAL CONDITION may be made in accordance with the ACTION requirements when conformance to them permits continued operation of the facility for an unlimited period of time. This provision shall not prevent passage through or to OPERATIONAL CONDITIONS as required to comply with ACTION requirements. Exceptions to these requirements are stated in the individual Specifications.

INSERT B

- 4.0.3 Failure to perform a Surveillance Requirement within the allowed surveillance interval, defined by Specification 4.0.2, shall constitute noncompliance with the OPERABILITY requirements for a Limiting Condition for Operation. The time limits of the ACTION requirements are applicable at the time it is identified that a Surveillance Requirement has not been performed. The ACTION requirements may be delayed for up to 24 hours to permit the completion of the surveillance when the allowable outage time limits of the ACTION requirements are less than 24 hours. Surveillance Requirements do not have to be performed on inoperable equipment.

INSERT C

- 4.0.4 Entry into an OPERATIONAL CONDITION or other specified applicable CONDITION shall not be made unless the Surveillance Requirements associated with the Limiting Condition for Operation have been performed within the applicable surveillance interval or as otherwise specified. This provision shall not prevent passage through or to OPERATIONAL CONDITIONS as required to comply with ACTION requirements.

INSERT A

- 3.0.4 Entry into an OPERATIONAL CONDITION or other specified CONDITION shall not be made when the conditions for the Limiting Conditions for Operations are not met and the associated ACTION requires a shutdown if they are not met within a specified time interval. Entry into an OPERATIONAL CONDITION may be made in accordance with the ACTION requirements when conformance to them permits continued operation of the facility for an unlimited period of time. This provision shall not prevent passage through or to OPERATIONAL CONDITIONS as required to comply with ACTION requirements. Exceptions to these requirements are stated in the individual Specifications.

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