



Commonwealth Edison
1400 Opus Place
Downers Grove, Illinois 60515

May 22, 1991

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

Subject: LaSalle County Station Units 1 and 2 Application for
Amendment to Facility Operating Licenses NPF-11 and
NPF-18, Appendix A, Technical Specifications
Generic Letter 89-01 Changes
NRC Docket Nos. 50-373 and 50-374

Reference: (a) NRC Generic Letter 89-01 dated January 31, 1989,
Implementation of Programmatic Controls for
Radiological Effluent Technical Specifications
(RETS) in the Administrative Controls Section of
the Technical Specifications and Relocation of
procedural details of RETS to the Offsite Dose
Calculational Manual (ODCM) or to the Process
Control Program (PCP).

Gentlemen:

Pursuant to 10 CFR 50.90, Commonwealth Edison (CECo) proposes to amend Appendix A, Technical Specifications, of Facility Operating Licenses NPF-11 and NPF-18. The proposed amendment requests the following changes: 1) relocate the procedural details of the current radioactive effluent/radiological environmental monitoring program and solid radioactive waste program from the Technical Specifications to the ODCM and PCP, respectively; 2) install programmatic controls into the Administrative Controls section of the Technical Specifications. These changes will simplify the Technical Specifications and fulfill the goal of the Commission Policy Statement for Technical Specification Improvements. LaSalle County Station will continue to meet the regulatory requirements for radioactive effluents and radiological environmental monitoring. A complete and legible copy of the entire ODCM has been submitted to the Commission. Enclosed is a non-controlled copy of Chapter 12 of the CECo ODCM which contains the procedural details transferred from the Technical Specifications. Future updates to the ODCM shall be submitted in accordance with Technical Specification 6.8.2.

The proposed amendment was prepared in accordance with the guidance provided in Reference (a). It is requested that the amendments be made effective 30 days from the date of approval.

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This proposed amendment request is subdivided as follows:

1. Attachment A gives a description and safety analysis of the proposed changes in this amendment.
2. Attachment B includes the marked-up Technical Specifications pages with the requested changes indicated.
3. Attachment C describes CECO's evaluation performed in Accordance with 10 CFR 50.92 (c), which confirms that no significant hazards consideration is involved.
4. Attachment D provides the Environmental Assessment.
5. Attachment E includes a non-controlled copy of Chapter 12 of Commonwealth Edison's ODCM.

This proposed amendment has been reviewed and approved by CECO On-Site and Off-Site Review in accordance with Commonwealth Edison procedures.

To the best of my knowledge and belief, the statements contained above are true and correct. In some respect these statements are not based on my personal knowledge, but obtained information furnished by other Commonwealth Edison employees, contractor employees, and consultants. Such information has been reviewed in accordance with company practice, and I believe it to be reliable.

Commonwealth Edison is notifying the State of Illinois of this 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 concerning this submittal to this office.

Very truly yours,



Peter L. Piet
Nuclear Licensing Administrator

May 22, 1991

Attachments:

- A. Description of Safety Analysis of the Proposed Changes
- B. Marked-Up Technical Specification Pages
- C. Evaluation of Significant Hazards Considerations
- D. Environmental Assessment
- E. Chapter 12 of the Commonwealth Edison ODCM

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

Signed before me on this 22nd day
of May, 1991,
by Lynn M. Wilodarski
Notary Public



ATTACHMENT A

DESCRIPTION AND SAFETY ANALYSIS OF PROPOSED CHANGES TO APPENDIX A, TECHNICAL SPECIFICATIONS OF FACILITY OPERATING LICENSES NPF-11 AND NPF-18

DESCRIPTION

The proposed amendment for RETS is based upon NRC Generic Letter 89-01 and would implement the following changes: 1) incorporate programmatic controls in the Administrative Controls section of the Technical Specifications that satisfy the requirements of 10 CFR 20.106, 40 CFR Part 190, 10 CFR 50.36a, and Appendix I to 10 CFR Part 50; 2) relocate the existing procedural details in the current specification involving radioactive effluent monitoring instrumentation, the control of liquid and gaseous effluents, equipment requirements for liquid and gaseous effluents, radiological environmental monitoring, and radiological reporting details from the Technical Specifications to the ODCM; 3) relocate the definition of solidifications and existing procedural details from the current specification on solid radioactive wastes to the PCP; 4) simplify the associated reporting requirements; 5) simplify the administrative controls for changes to the ODCM and PCP; 6) add record retention requirements for changes to the ODCM and PCP; and 7) update the definitions of the ODCM and PCP consistent with these changes.

The following is a brief summary of the proposed changes:

1. The definitions section of the Technical Specifications will be amended to reflect the changes to the definitions for "ODCM" and "PCP" as recommended in the generic letter. Two (2) additional definitions will be added for terms not previously defined in the Technical Specifications. These terms are "Member(s) of the Public" and "Site Boundary." The definition of "Solidification" will be relocated to the PCP manual.
2. Specification 3/4.3.7.10 will be deleted from the Technical Specifications. Programmatic controls will be included in Technical Specification 6.2.F.4. Procedural details will be relocated to the ODCM.
3. Specification 3/4.3.7.11 will be deleted from the Technical Specifications with the exception of the requirements for the explosive gas monitors, which will be retained. Programmatic controls will be included in Technical Specification 6.2.F.4. Procedural details will be relocated to the ODCM. The proposed amendment for the explosive gas monitors follows the recommendations of the generic letter with changes in format only.
4. Specification 3/4.11.1.1, 3/4.11.1.2 and 3/4.11.1.3 will be deleted from the Technical Specifications in their entirety. Programmatic controls will be included in Technical Specifications 6.2.F.4. Procedural details will be relocated to the ODCM.

5. Specification 3/4.11.2.1 will be deleted from the Technical Specifications. Programmatic controls will be included in Technical Specification 6.2.F.4. Procedural details will be relocated to the ODCM.
6. Specifications 3/4.11.2.2 and 3/4.11.2.3 will be deleted from the Technical Specifications. Programmatic controls will be included in Technical Specification 6.2.F.4. Procedural details will be relocated to the ODCM.
7. Specifications 3/4.11.2.4, 3/4.11.2.5 and 3/4.11.2.8 will be deleted from the Technical Specifications. Programmatic controls will be included in Technical Specifications 6.2.F.4. Procedural details will be relocated to the ODCM.
8. Specification 3/4.11.3 will be deleted from the Technical Specifications. The procedural details of Specification 3/4.11.3 will be relocated to the PCP.
9. Specification 3/4.11.4 will be deleted from the Technical Specifications in its entirety. Programmatic controls will be included in Technical Specification 6.2.F.4. Procedural details will be relocated to the ODCM.
10. Specification 3/4.12.1, 3/4.12.2 and 3/4.12.3 will be deleted from the Technical Specifications. Programmatic controls will be included in Technical Specifications 6.2.F.5. Procedural details will be relocated to the ODCM.
11. Proposed changes have been made to the specification bases to reflect the changes made to the body of the Technical Specifications.
12. Figure 5.1.1-1 will be replaced with an improved map of the exclusion area and the site boundaries. The new map is more readable and provides greater detail of the existing site boundaries.
13. A new more readable copy of Figure 5.1.2-1 (Low Population Zone) is being provided with this submittal.
14. Specifications 6.2.F.4 and 6.2.F.5 will be added to the Administrative Technical Specifications to provide programmatic controls for radiological effluents.
15. Specification 6.5.B.18 has been added to the Administrative Technical Specifications to provide requirements for retention of the records for review of changes made to the ODCM and the PCP.
16. Specifications 6.6.A.3 and 6.6.A.4 will be amended to simplify the reporting requirements for the "Annual Radiological Environmental Operating Report" and the "Semiannual Radioactive Effluent Release Report."
17. Specifications 6.7.2 and 6.8.2 will be amended to simplify the requirements for making changes to the PCP and ODCM.

BASES OF THE PROPOSED CHANGES

This amendment request affects those sections of the Technical Specifications concerning the control of radiological effluents, which include gaseous effluents, liquid effluents, solid waste, and environmental monitoring. Associated Technical Specifications addressing definitions, administrative controls and reporting are also affected. The purpose of these specifications is to assure compliance with regulatory requirements governing radioactive effluents, including 10 CFR 20.106, 40 CFR Part 190, 10 CFR 50.36a, and Appendix I to 10 CFR 50.

In accordance with the guidance of Generic Letter 89-01, this proposed change adds new programmatic requirements governing radioactive effluents and radiological environmental monitoring to the Administrative Controls sections of the Technical Specifications. Existing Technical Specifications containing procedural details on radioactive effluents, solid radioactive wastes, environmental monitoring, and associated reporting requirements are being deleted. The procedural details which are to be deleted are being incorporated into the Offsite Dose Calculation Manual (ODCM) or Process Control Program (PCP) as appropriate. The Technical Specification definitions of the ODCM and PCP are also revised to reflect these changes.

The proposed changes to the Technical Specifications are administrative in nature and affect only the format and location of procedural details related to the control of radioactive effluents, solid radioactive waste, and radiological environmental monitoring. The proposed changes do not involve physical modifications to plant equipment or changes in the operation of the plant.

Although the procedural details of RETS are being removed from the Technical Specifications, this information is being relocated to the ODCM or PCP as appropriate. Additional administrative controls are being added to the Technical Specifications to ensure that the ODCM and PCP will maintain compliance with applicable regulatory requirements. For example, per proposed Technical Specification 6.8, future changes to the ODCM will be reviewed to ensure that such changes will "maintain the level of radioactive effluent control required by 10 CFR 20.106, 40 CFR Part 190, 10 CFR 50.36a, and Appendix I to 10 CFR 50 and not adversely impact the accuracy or reliability of effluent, dose, or setpoint calculations." Similar controls are applied to changes in the PCP.

Any deviations from Generic Letter 89-01 are minor and do not alter the intent of the guidance. For example, Section 6.8.2 is being modified as follows:

- b. Shall become effective after review and acceptance by the On-Site Review and Investigative Function and the approval of the Plant Manager on the date specified by the On-Site Review and Investigative Function.

- c. Shall be submitted to the Commission in the form of a complete, legible copy of the entire ODCM as a part of or concurrent with the Seminannual Radioactive Effluent Release Report for the period of the report in which any change to the ODCM was made effective. Each change shall be identified by markings in the margin of the affected pages, clearly indicating the area of the page that was changed, and shall indicate the date (e.g., month/year) the change was implemented.

The deviations from Generic Letter 89-01 are underlined. These changes serve to clarify the requirements provided in Generic Letter 89-01 as applied to Commonwealth Edison practices. These changes are minor in content and do not alter the intent of the requirements.

SUMMARY

As discussed above, there are no physical changes to the plant or changes in plant operation associated with this proposed amendment. Therefore, there is no increase in the probability of occurrence or the consequence of an accident or malfunction of equipment important to safety nor is the possibility as evaluated in the safety analysis report created. The amendment request is administrative in nature and is consistent with NRC guidance provided in Generic Letter 89-01. New administrative controls are incorporated into the Technical Specifications which ensure that the relocated procedural detail is controlled in a manner which provides for continued compliance with applicable regulatory requirements. Therefore, there is no degradation of the level of control provided over radioactive effluents, solid radioactive waste, or radiological environmental monitoring and no reduction of the margin of safety as defined in the basis for any Technical Specification.

These changes serve to simplify the Technical Specifications to fulfill the goal of the Commission Policy Statement for Technical Specification Improvements. LaSalle County Station will continue to meet the regulatory requirements for radioactive effluents and radiological environmental monitoring. The proposed amendment was prepared in accordance with the guidance provided in Generic Letter 89-01 (Reference (a)).

ATTACHMENT B

PROPOSED CHANGES TO APPENDIX A,
TECHNICAL SPECIFICATIONS OF FACILITY
OPERATING LICENSES NPF-11 AND NPF-18

REVISED PAGES

UNIT ONE (NPF-11)

UNIT TWO (NPF-18)

I
II
V
XI
XIII
XVI
XVIII
XXII
XXIII

I
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3/4 3-83 Page Deleted
3/4 3-84 Page Deleted
3/4 3-85 Page Deleted
3/4 3-86 Spec. replaced
3/4 3-87 Spec. replaced
3/4 3-88 Spec. replaced
3/4 3-89 Spec. replaced
3/4 3-90 Spec. replaced
3/4 3-81 New page
3/4 3-82 New page
3/4 3-83 New page
3/4 3-91 Page renumbered to 3-84
3/4 3-92 Page renumbered to 3-85
3/4 3-93 Page renumbered to 3-86
3/4 3-94 Page renumbered to 3-87
3/4 3-95 Page renumbered to 3-88
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3/4 11-8 Page renumbered to 11-1
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3/4 11-10 Page Deleted
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ATTACHMENT B (continued)

PROPOSED CHANGES TO APPENDIX A,
TECHNICAL SPECIFICATIONS OF FACILITY
OPERATING LICENSES NPF-11 AND NPF-18

REVISED PAGES

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3/4 12-4 Page Deleted	3/4 12-4 Page Deleted
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3/4 12-6 Page Deleted	3/4 12-6 Page Deleted
3/4 12-7 Page Deleted	3/4 12-7 Page Deleted
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