

ATTACHMENT B
PROPOSED AMENDMENTS TO THE
LICENSE/TECHNICAL SPECIFICATIONS

NPF-18

3/4 3-7

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TABLE 4.3.1.1-1

REACTOR PROTECTION SYSTEM INSTRUMENTATION SURVEILLANCE REQUIREMENTS

<u>FUNCTIONAL UNIT</u>	<u>CHANNEL CHECK</u>	<u>CHANNEL FUNCTIONAL TEST</u>	<u>CHANNEL CALIBRATION(a)</u>	<u>OPERATIONAL CONDITIONS FOR WHICH SURVEILLANCE REQUIRED</u>
1. Intermediate Range Monitors				
a. Neutron Flux - High	S/U ^(b) , S	S/U ^(c) , W	R	2
b. Inoperative	NA	W	R NA	3, 4, 5 2, 3, 4, 5
2. Average Power Range Monitor: ^(f)				
a. Neutron Flux - High, Setdown	S/U ^(b) , S	S/U ^(c) , W	SA SA	1, 2 3, 5
b. Flow Biased Simulated Thermal Power-Upscale	S, D ^(g)	S/U ^(c) , W	W ^{(d)(e)} , SA, R ^(h)	1
c. Fixed Neutron Flux - High	S	S/U ^(c) , W	W ^(d) , SA	1
d. Inoperative	NA	W	NA	1, 2, 3, 5
3. Reactor Vessel Steam Dome Pressure - High	NA	M	Q	1, 2
4. Reactor Vessel Water Level - Low, Level 3	NA	M	R	1, 2
5. Main Steam Line Isolation Valve - Closure	NA	Q #	R	1
6. Main Steam Line Radiation - High	S	M	R	1, 2
7. Primary Containment Pressure - High	NA	M	Q	1, 2

Insert "INSERT A" here

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INSERT A

*The quarterly surveillance interval which began at 03:45 a.m. CDT October 23, 1994, is extended until the scheduled shutdown ending Unit 2 operating cycle 6. The total surveillance interval shall not exceed 120 days, i.e., the surveillance shall be performed prior to 02:45 a.m. CST on February 20, 1995.

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 Unit 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 change does not involve a significant increase in the probability or consequences of an accident previously evaluated. The proposed change increases the STI for actuation instrumentation supporting RPS trip functions. There are no changes in the affected system itself. Because of this there is no change in the probability of occurrence of an accident or the consequences of an accident or the consequences of malfunction of equipment. With respect to the malfunction of equipment, topical reports prepared by GE demonstrated that there is a reduction in scram frequency for the RPS. This offsets the slight increase in trip function unavailability determined by GE. This was judged acceptable by GE. The NRC concurred with this conclusion in its review of the topical report (NEDC-30851P-A) and as referenced by the LaSalle Unit 2 Technical Specification Bases for specification 3/4.3.1. The proposed one time change is bounded by the topical report, which determined that surveillance test interval extension from one month to 4 months (124 days) is acceptable. The proposed changes therefore do not involve a significant increase in the probability or consequences of an accident previously evaluated.

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

The proposed changes do not create the possibility for an accident or malfunction of a different type than any evaluated previously in the UFSAR. The proposed change increases the STI for MSIV - Closure Scram RPS Instrumentation. There are no changes in the instrumentation of this system. Since there are no such changes there is no possibility for an accident or malfunction of a different type than any previously evaluated.

ATTACHMENT C
SIGNIFICANT HAZARDS CONSIDERATION

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

The proposed change does not reduce the margin of safety as defined in the basis for any Technical Specification. The proposed changes do not change any setpoints in the above mentioned system or levels of redundancy. Setpoints are based upon the drift occurring during an 18 month calibration interval. The proposed change is bounded by the analyses of NEDC-30851P-A as referenced by the LaSalle Unit 2 Technical Specification Bases for specification 3/4.3.1. These analyses, which were prepared by GE and approved by the NRC, examined the effects of extending STI and found that the proposed changes would not involve a significant reduction in a margin of safety.

Guidance has been provided in "Final Procedures and Standards on No Significant Hazards Considerations," Final Rule, 51 FR 7744, 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. These proposed amendments most closely fit the example of a change which may either result in some increase to the probability or consequences of a previously analyzed accident or may reduce in some way a safety margin, but where the results of the change are clearly within all acceptable criteria with respect to the system or component specified in the applicable Standard Review Plan.

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 limiting safety system settings or a significant relaxation of the bases for the limiting conditions for operations. Therefore, based on the guidance provided in the Federal Register and the criteria established in 10 CFR 50.92(c), the proposed change does not constitute a significant hazards consideration.

ATTACHMENT D

ENVIRONMENTAL ASSESSMENT STATEMENT APPLICABILITY REVIEW

Commonwealth Edison has evaluated the proposed amendment against the criteria for identification of licensing and regulatory actions requiring environmental assessment in accordance with 10 CFR Part 51.21. It has been determined that the proposed changes meet the criteria for categorical exclusion as provided for under 10 CFR Part 51.22(c)(9). This conclusion has been determined because the changes requested do not pose significant hazards considerations or do not involve a significant increase in the amounts, and no significant changes in the types of any effluents that may be released off-site. Additionally, this request does not involve a significant increase in individual or cumulative occupational radiation exposure.

ATTACHMENT E

ASME SECTION XI INSERVICE TESTING PROGRAM RELIEF REQUEST

VALVE RELIEF REQUEST: RV-57

Affected Components:

<u>Component EPN</u>	<u>Class/Category</u>	<u>Function</u>
2B21-F022A/B/C/D	1/A	Inboard Main Steam Isolation Valve
2B21-F028A/B/C/D	1/A	Outboard Main Steam Isolation Valve

Component Function:

The function of the Inboard and Outboard Main Steam Isolation valves is to open to allow main steam flow to the turbine and to close to isolate the primary containment and the reactor pressure boundary.

ASME Section XI Test Requirement:

IWV-3412(a): Quarterly partial exercising of valves which cannot be full stroke time quarterly.

Basis for Relief:

ASME Section XI requires that all Category A and B power operated valves be full stroke timed each quarter. The above referenced ASME Section XI subsection states that if this testing is not practical during normal operation, partial stroke exercising shall be performed quarterly and the full stroke time test shall be deferred until cold shutdown. Relief Request RV-22 of the present LaSalle Inservice Testing Program documents LaSalle's justification for this alternative testing method and frequency for the Inboard and Outboard Main Steam Isolation Valves. This relief request was approved for use at LaSalle via the NRC IST SER dated August 16, 1988.

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Technical Specification 4.0.5 states that quarterly ASME surveillance testing has a frequency of 92 days. This Technical Specification also states that the maximum allowable extension of 25% of the this frequency per Technical Specification 4.0.2 may be applied. The partial exercising of the Unit 2 MSIVs will exceed the specified quarterly surveillance interval and the maximum extension of 25% of the interval on February 15, 1995. This is only 3 days before the scheduled shutdown for the Unit 2 sixth refueling outage, L2R06 on February 18, 1995.

Due to a problem that has developed with the LaSalle Unit 2 MSIV Limit Switches, LaSalle Unit 2 must reduce power to less than 25% core thermal power prior to the end of the quarterly exercising interval to verify that the limit switches are in the "Spring Return-to-Normal" position. The nature of the problem is that some of the limit switches may not always automatically return the limit switch arm to the normal position after being toggled during valve strokes. If a limit switch arm is not in the normal position when the valve is next moved from open to closed or vice-versa, the limit switch will not toggle. When a MSIV-RPS limit switch returns to normal after being tripped, then the limit switch will reset, and thus re-energize the associated RPS logic relay. However, the limit switch may not spring return to the normal position after being reset, which is not detectable until the next time the MSIV is cycled for a surveillance. During the time interval, an MSIV-RPS limit switch could be inoperable, unable to trip on MSIV closure. Therefore, LaSalle Unit 2 must reduce power to less than 25% power to de-inert the primary containment for entry to verify proper reset of the inboard MSIVs limit switches.

All MSIV limit switches were in the "Spring Return-to-Normal" position after the last quarterly stroke test on October 23, 1994, when LaSalle Unit 2 was starting up from a forced outage. Therefore the RPS limit switches for the MSIV - Closure Scram are currently Operable. The position of the MSIV limit switches will be unknown, without visual observation, after cycling the MSIVs during the next scheduled quarterly stroke test. Therefore, LaSalle Unit 2 must reduce power to less than 25% core thermal power, approximately 200 MWe, in order to allow personnel access to the primary containment drywell to verify proper MSIV limit switch position in the "Spring Return-to-Normal" position.

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ASME SECTION XI INSERVICE TESTING PROGRAM RELIEF REQUEST

VALVE RELIEF REQUEST: RV-57

Approval of this relief request will allow LaSalle Unit 2 to continue power operation until the scheduled shutdown for L2R06 by a one time extension of the quarterly Surveillance Test Interval (STI) by a maximum of 5 days. This provides a net safety benefit by not requiring the unit to maneuver to less than 25% core thermal power and undergo unnecessary cycling of plant equipment, precluding an additional downshift and upshift of the reactor recirculation pumps, and any associated challenges to safety systems. Also, this extension will save approximately 200 mrem dose to personnel.

Alternative Test:

LaSalle will replace the MSIV limit switches per a modification that is scheduled to be completed in L2R06. Once complete, the valves will be full stroke timed as required by the IST program prior to the end of the outage. Following the refuel outage, the MSIV test schedule will be resumed as delineated in Relief Request RV-22.