

**ATTACHMENT B
PROPOSED AMENDMENTS TO THE
LICENSE/TECHNICAL SPECIFICATIONS**

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- (d) The maximum average planar linear heat generation (MAPLHGR) limit will be reduced by 0.85.
- (e) Technical Specification Setpoints shall read as follows:
 - T.S.2.2.1 S 0.66W + 45.7 (Trip Setpoint)
S 0.66W + 48.7 (Allowable)
 - T.S.3.2.2 S (0.66W + 45.7) T*
S_{RB} (0.66W + 36.7) T*
T* as defined in T.S.3.2.2
 - T.S.3.3.6 APRM Upscale 0.66W + 36.7 (Trip Setpoint)
APRM Upscale 0.66W + 39.7 (Allowable)
RBM Upscale 0.66W + 34.7 (Trip Setpoint)
RBM Upscale 0.66W + 37.7 (Allowable)

- (f) The average power range monitor (APRM) flux noise will be measured once per shift; and the recirculation loop flow will be reduced if the flux noise averaged over 1/2 hour exceeds 5 percent peak to peak, as measured by the APRM chart recorder.
- (g) The core plate delta P noise will be measured once per shift, and the recirculation loop flow will be reduced if the noise exceeds one (1) psi peak-to-peak.

ADD "NPF11"
"INSERT A"

Am. 102
3/16/95

- D. The facility requires exemptions from certain requirements of 10 CFR Part 50, 10 CFR Part 70, and 10 CFR Part 73. These include:
 - (a) Exemptions from certain requirements of Appendices G, H and J and 10 CFR Part 73 are described in the Safety Evaluation Report and Supplement No. 1, No. 2 and No. 3 to the Safety Evaluation Report.
 - (b) An exemption was requested until the completion of the first refueling from the requirements of 10 CFR 70.24.
 - (c) An exemption from 10 CFR Part 50, Appendix E from performing full scale exercise within one year before issuance of an operating license, both exemptions (b) and (c) are described in Supplement No. 2 of the Safety Evaluation Report.
 - (d) An exemption was requested from the requirements of 10 CFR 50.44 until either the required 100 percent rated thermal power trip startup test has been completed or the reactor has operated for 120 effective full power days as specified by the Technical Specifications. Exemption (d) is described in the safety evaluation of License Amendment No. 12.

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NPF-11, INSERT A

2.C.(35) Surveillance Interval Extension

The performance interval for those surveillance requirements identified in the licensee's request for surveillance interval extension dated April 11, 1995, shall be extended to April 5, 1996, to coincide with the Unit 1 seventh re/fueling outage schedule. The extended interval shall not exceed a total of 25.1 months for 18 month surveillances.

the BWR Owners Group Report SLI-8211 and SLI-8218 and the recommendations of the BWR Owners Group reports. Any required modifications shall be completed on a scheduled acceptable to the NRC staff.

d. Modification of Automatic Depressurization System Logic Feasibility for Increased Diversity for Some Event Sequences (II.K.3.18, SER, SER #1, SSER #3, SSER #5)

Prior to startup after the first refueling outage, the licensee shall:

- (i) Install modifications to the Automatic Depressurization system described in the licensee's letter dated July 1, 1983. The final circuit diagrams and an analysis of the bypass timer time delay shall be submitted for NRC staff review and approval prior to installation.
- (ii) Incorporate into the Plant Abnormal Procedures the usage of the inhibit switch; and
- (iii) Modify the Technical Specifications to provide the bypass timer and manual inhibit switch.

ADD "NPF-18"
"INSERT A"

Am. 87
3/16/95

D. The facility requires exemptions from certain requirements of 10 CFR Part 50, 10 CFR Part 70, and 10 CFR part 73. These include:

- (a) Exemptions from certain requirements of Appendices G, H and J to 10 CFR part 50, and to 10 CFR Part 73 are described in the Safety Evaluation Report and Supplement Numbers 1, 2, 3, and 5 to the Safety Evaluation Report.
- (b) An exemption was requested until completion of the first refueling from the requirements of 10 CFR 70.24.
- (c) An exemption from the requirement of paragraph III.D of Appendix J to conduct the third Type A test of each ten-year service period when the plant is shutdown for the 10-year plant inservice inspections.
- (d) A one-time exemption from the requirement of paragraph III.A.6(b) of Appendix J to resume a Type A test schedule of three times in ten years. Exemptions (c) and (d) are described in the Safety Evaluation accompanying Amendment No. 87 to this license. These exemptions are authorized by law and will not endanger life or property or the common defense and security and are otherwise in the public interest. Therefore, these exemptions are hereby granted pursuant to 10 CFR 50.12. With the granting of these exemptions the facility will operate, to the extent authorized herein, in conformity with the application, as amended, the provisions of the Act, and the rules and regulations of the Commission.

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NPF-18, INSERT A

2.C.(19) Surveillance Interval Extension

The performance interval for those surveillance requirements identified in the licensee's request for surveillance interval extension dated April 11, 1995, shall be extended to April 5, 1996, to coincide with the Unit 1 seventh refueling outage schedule. The extended interval shall not exceed a total of 25.1 months for 18 month surveillances.

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 change is temporary and allows a one-time extension of specific surveillance requirements for Unit 1 Cycle 7 to allow surveillance testing to coincide with the seventh refueling outage. The proposed surveillance interval extension is short and will not cause a significant reduction in system reliability nor affect the ability of the systems to perform their design function. Current monitoring of plant conditions and continuation of the surveillance testing required during normal plant operation will continue to be performed to ensure conformance with Technical Specification operability requirements. Therefore, this change does 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:

Extending the surveillance interval for the performance of specific testing will not create the possibility of any new or different kind of accidents. No changes are required to any system configurations, plant equipment, or analyses. Therefore, this change will not create the possibility of a new or different kind of accident from any accident previously evaluated.

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

Surveillance interval extensions will not impact any plant safety analyses since the assumptions used will remain unchanged. The safety limits assumed in the accident analyses and the design function of the equipment required to mitigate the consequences of any postulated accidents will not be changed since only the surveillance test interval is being extended. Historical performance generally indicates a high degree of reliability, and surveillance testing performed during normal plant operation will continue to be performed to verify continued Operability of affected systems, structures and components. Therefore, the plant will be maintained within the analyzed limits, and the proposed extension will not significantly reduce the margin of safety.

ATTACHMENT C
SIGNIFICANT HAZARDS CONSIDERATION

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 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
SURVEILLANCE REQUIREMENTS TO BE EXTENDED

TECHNICAL SPECIFICATION SECTION	DESCRIPTION	18-MONTH PLUS 25% ALLOWANCE EXPIRATION DATE (First date of multiple)
4.3.2.1 Items A.2.a and A.2.d	Channel Calibration of Isolation Actuation Instrumentation, Secondary Containment Unit 1 Radiation Monitors.	2/10/96
4.3.2.1 and 4.3.2.2, Items B.1, 2, 3, 4	Isolation Actuation Instrumentation, Manual Initiation Logic System Functional Test and Channel Functional Test.	3/8/96
4.3.2.2 Items A.1.a.(2), A.1.b, A.2.a, b, c, d; and 4.6.3.2, 4.6.5.2.b, 4.6.5.3.d.2	Primary and Secondary Containment Isolation Actuation System Logic System Functional Tests for Valve Groups 2 and 4.	1/20/96
4.3.2.3 Items A.1.c.2), A.1.c.3)	Response Time Test of Isolation Actuation Instrumentation for Valve Group 1.	1/26/96
4.3.3.1* Items D.1, D.2	Channel Calibration of ECCS Actuation Instrumentation, Undervoltage and Degraded Voltage Relays.	1/19/96
4.3.3.2, 4.5.1.c.1, 4.5.2.1	ECCS Actuation System Logic System Functional Tests for HPCS, LPCS, and A LPCI (RHR).	1/23/96
4.3.3.3 Table 3.3.3-1 Items B.1.a, C.1.a	Response Time Test of ECCS Actuation Instrumentation for RHR B and C (LPCI Mode) Level 1, Channels B and D, and HPCS Level 2, Channels B and D.	1/30/96

* This surveillance requirement affects both Unit 1 and 2.

ATTACHMENT E
SURVEILLANCE REQUIREMENTS TO BE EXTENDED

TECHNICAL SPECIFICATION SECTION	DESCRIPTION	18-MONTH PLUS 25% ALLOWANCE EXPIRATION DATE (First date of multiple)
4.3.4.1.2	ATWS Recirculation Pump Trip System Logic System Functional Test.	1/26/96
4.3.4.2.2	End-of-Cycle Recirculation Pump Trip System Logic System Functional Test.	1/26/96
4.4.3.2.2.a	Reactor Coolant System Pressure Isolation Valve leakage test (High Pressure Water Test) for Unit 1 HPCS Injection Valve E22-F005 and LPCI C Injection Valve E12-F041C.	1/27/96
4.6.3.6.a	Main Steam Lines leakage through the Isolation Valves, for lines A, C, and D.	1/23/96
4.7.6.1.c	Fire Rated Seals, Sealed Penetration Inspection (Electrical Bus Duct).	1/24/96
4.7.9.e	Mechanical Snubber Functional Testing.	2/1/96
4.8.1.1.2.d.1* and 4.8.1.2	Diesel Generators 0*, 1A*, and 1B Maintenance Inspections.	1/19/96
4.8.1.1.2.d.7*, d.13*, and 4.8.1.2 and 4.8.1.1.2.d.11.b DG 1B only.	Trip and Trip Bypass Tests for Diesel Generators 0*, 1A*, and 1B and Division 3 trip test with Diesel Generator 1B Operating in a Test Mode.	2/1/96

* This surveillance requirement affects both Unit 1 and 2.

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SURVEILLANCE REQUIREMENTS TO BE EXTENDED

TECHNICAL SPECIFICATION SECTION	DESCRIPTION	18-MONTH PLUS 25% ALLOWANCE EXPIRATION DATE (First date of multiple)
4.8.2.3.2.c.4* and 4.8.2.4.2	Division 1 and 2* Battery Charger Tests.	2/07/96
4.8.2.3.2.d and 4.8.2.4.2	Division 1 Battery Service Test.	2/15/96
4.8.3.3.1	Channel Functional Test of Thermal Overload Bypass Circuitry for HPCS, LPCS, and Primary and Secondary Containment Isolation Valve Groups 2 and 4.	1/20/96

* This surveillance requirement affects both Unit 1 and 2.

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1. Channel Calibration of Isolation Actuation Instrumentation, Secondary Containment Unit 1 Radiation Monitors:
 - a. Unit 1 Reactor Building Vent Exhaust Plenum Radiation Monitor Calibration surveillance test is due 9/26/95 and critical 2/10/96. These instrument calibrations involve using a radiation source and thus should be scheduled during a time when instruments are not required by Technical Specification 3.3.2, Table 3.3.2.1-1, Trip Function A.2.a. The last five surveillances were reviewed and the instruments have not drifted outside of the Technical Specification allowable values during calibration intervals. This surveillance is required to be performed by Technical Specification SR 4.3.2.1, Table 4.3.2.1-1.
 - b. Unit 1 Reactor Building Fuel Pool Exhaust Radiation Monitor Calibration surveillance test is due 10/2/95 and critical 2/16/96. These instrument calibrations involve using a radiation source and thus should be scheduled during a time when instruments are not required by Technical Specification 3.3.2, Table 3.3.2.1-1, Trip Function A.2.d. The last five surveillances were reviewed and the instruments have not drifted outside of the Technical Specification allowable values during calibration intervals. This surveillance is required to be performed by Technical Specification SR 4.3.2.1, Table 4.3.2.1-1.
2. Isolation Actuation Instrumentation, Manual Initiation Logic System Functional Test and Channel Functional Test is due 10/23/95 and critical 3/08/96. This procedure is a logic system functional test and a Channel Functional Test for highly reliable switches, relays, and wiring. These procedures do not test equipment with a tendency to drift over time. The previous four Unit 1 surveillances were reviewed and were satisfactory, with no equipment/component or other problems noted. A review of industry data for the same type of relay (Agastat GPI), revealed a total of only three failures, representing a low failure rate. These procedures are required by Technical Specification SRs 4.3.2.1 and 4.3.2.2, Items B.1, 2, 3, 4.
3. Primary and Secondary Containment Isolation Actuation System Logic System Functional Test for Valve Groups 2 and 4, and Thermal Overload Bypass Channel Functional Test is due 9/5/95 and critical 1/20/96. These procedures are logic system functional tests for highly reliable switches, relays, and wiring. These procedures do not test equipment with a tendency to drift over time. A review of previous surveillances identified two relays that were replaced; one had possible concerns with its response time but did not affect the satisfactory

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completion of the surveillance. During another surveillance, there was a possible relay failure which may have caused three Reactor Recirculation System Hydraulic Power Unit isolation valves to reopen after receiving an isolation signal. A review of industry data for the same type of relay (Agastat GPI) revealed a total of only three failures, representing a low failure rate. These procedures are required by Technical Specification SRs 4.3.2.2, 4.6.3.2, 4.6.5.2.b, 4.6.5.3.d.2, and 4.8.3.3.1.

4. Response Time Test of Isolation Actuation Instrumentation for Valve Group 1, Items A.1.c.2) and A.1.c.3).
 - a. Main Steam Line High Flow Primary Containment Isolation Response Time Test is due 9/13/95 and critical 1/28/96. A review of the last four surveillances revealed that a response time test has not failed to meet the acceptance criteria. Therefore, the overall response times would be met. This surveillance is required by Technical Specification SR 4.3.2.3.
 - b. Main Steam Line Low Pressure Primary Containment Isolation Response Time Test is due 9/11/95 and critical 1/26/96. A review of the last four surveillances revealed that a response time test has not failed to meet the acceptance criteria. Therefore, overall response times would be met. This surveillance is required by Technical Specification SR 4.3.2.3.
5. Channel Calibration of ECCS Actuation Instrumentation, Undervoltage and Degraded Voltage Relays. Safety Related Buses 141Y, 142Y, and 143 Undervoltage Relay Calibrations are due 9/4/95 and critical 1/19/96. Also, due to Unit 2 requirements for diesel generator and bus operability, Unit 2 is also affected and requires surveillance interval extension. The relays covered by this procedure are the normal bus undervoltage relays and the bus degraded voltage undervoltage relays. The last five surveillances were reviewed and the instruments have not drifted outside of the Technical Specification allowable values during calibration intervals. These electrical protective relays are required to meet the requirements of Technical Specification SR 4.3.3.1 and Table 4.3.3.1-1, Trip Functions D.1 and D.2.
6. ECCS Actuation System Logic System Functional Tests for HPCS, LPCS, and A LPCI (RHR), and Thermal Overload Bypass Channel Functional Tests. HPCS is due 9/8/95 and critical 1/23/96, LPCS is due 9/21/95 and critical 2/5/96, and Division 1 RHR (logic system functional tests only) is due 9/19/95 and critical 2/3/96. These tests are logic system functional tests for highly

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reliable switches, relays, and wiring. The MOVs, pump/fan breakers and instrument channels tested in these procedures are also tested in other procedures for IST and/or instrument channel functional/calibration purposes. These procedures do not test equipment with a tendency to drift over time. The logic is static and the failure frequency is not time dependent. The previous five surveillances have been performed satisfactorily. These surveillances are required to be performed by Technical Specification SRs 4.3.3.2, 4.8.3.3.1 (not Division 1 RHR), 4.5.1.c.1, and 4.5.2.1.

7. Response Time Test of ECCS Actuation Instrumentation for RHR B and C Level 1, Channels B and D, and HPCS Level 2, Channels B and D; Items B.1.a, C.1.a.
 - a. Level 1 Emergency Core Cooling Systems Initiation Sensor, Switch, and Relay Response Time Test is due 9/20/95 and critical 2/4/96. This response time test is a small fraction of the overall 60-second ECCS response times. No overall response time test has ever failed to meet the acceptance criteria. The original RTT requirements came from an analysis at full power. These surveillances will not exceed the critical surveillance interval until after the unit is shutdown for refuel. These surveillances are required by Technical Specification SR 4.3.3.3.
 - b. Level 2 High Pressure Core Spray Initiation Sensor, Switch, and Relay Response Time Test is due 9/15/95 and critical 1/30/96. No overall response time test has ever failed to meet the acceptance criteria. The instrumentation response times are only a small fraction of the overall ECCS response time, thus even with a 500% increase in the instrumentation response time, the overall response times would be met. The original RTT requirements came from an analysis at full power. This surveillance will not exceed the critical surveillance interval until after the unit is shutdown for refuel. These surveillances are required by Technical Specification SR 4.3.3.3.
8. Anticipated Transient Without Scram (ATWS) Recirculation Pump Trip Logic System Functional Test is due 9/11/95 and critical 1/26/96. This test is a logic system functional test for highly reliable switches, relays, and wiring. The pump breakers and instrument channels tested in this procedure are also tested in other procedures for IST and/or instrument channel functional/calibration purposes. This procedure does not test equipment with a tendency to drift over time. The logic is static and the failure frequency is not

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strongly time dependent. The last five surveillances have been satisfactorily performed. However, during one surveillance, a wiring discrepancy was identified which did not affect the results. The wiring discrepancy was corrected. This surveillance is required by Technical Specification SR 4.3.4.1.2.

9. End-of-Cycle Recirculation Pump Trip Logic System Functional Test is due 9/11/95 and critical 1/26/96. This test is a logic system functional test for highly reliable switches, relays, and wiring. The pump breakers and instrument channels tested in this procedure are also tested in other procedures for IST and/or instrument channel functional/calibration purposes. This procedure does not test equipment with a tendency to drift over time. The logic is static and the failure frequency is not time dependent. Of the previous six surveillances which were reviewed, there was one failure which was attributed to a combination of an incorrect physical manipulation and a misadjustment of the relay gap which resulted in two contacts failing to close. During normal plant operation this failure would have been identified through a routine panel walkdown. This surveillance is required by Technical Specification SR 4.3.4.2.2.
10. Reactor Coolant System Pressure Isolation Valve leakage test (High Pressure Water Test) for Unit 1 HPCS Injection Valve E22-F005 and LPCI C Injection Valve E12-F041C. HPCS is due 9/12/95 and critical 1/27/96, and 'C' LPCI is due 9/13/95 and critical 1/28/96. A review of local leak rate testing history was performed, and the valves tested by these surveillances have never failed to meet the 1 gallon per minute leakage requirement. The review of industry applications for similar valves identified some leakage problems with the more conservative "Type C" LLRT. The Type C LLRT's for these valves will be performed prior to the critical date. During reactor operation, leakage through these valves would be identified by a corresponding increase in system discharge pressure, which would provide an alarm in the control room. These surveillances are required by ASME Section XI to be performed only on a refuel frequency, and by Technical Specification SR 4.4.3.2.2.a on an 18 month frequency.
11. Main Steam Lines leakage through the Isolation Valves for lines A, C, and D. Main Steam Isolation Valve Local Leak Rate Tests are due 9/8/95 and critical 1/23/96. The MSIV's have generally shown good reliability in leak rate testing at LaSalle. Although there has been seat leakage problems with MSIV's identified through LLRT's both at LaSalle and throughout the industry, the station has never failed to meet the required Minimum Path Leakage requirements. These surveillances are required by 10 CFR Part 50 Appendix J

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to be performed on a 24 month frequency, and will be performed within 24 months, even though the proposed extension of 18 months would allow approximately 25 months. The leak rate tests are required to be performed every 18 months by Technical Specification SR 4.6.3.6.a.

12. Fire Rated Seals, Sealed Penetration Inspection (Electrical Bus Duct). Interior and Exterior Bus Duct Fire Seal Inspections are due 9/9/95 and critical 1/24/96. All inspections performed since 1985 were reviewed, and no failures of these fire seals have occurred. These fire seal inspections must be done during a unit outage. These inspections are required by Technical Specification Surveillance Requirement (SR) 4.7.6.1.c, which states that 10% of each fire seal type be inspected every 18 months.
13. Mechanical Snubber Functional Testing is due 9/17/95 and critical 2/1/96. As demonstrated through past surveillances, these components are not highly susceptible to aging. Of the 142 snubbers functionally tested in the previous four Unit 1 refueling outages there have been four failures identified. Of these, one was attributed to dried grease due to elevated area temperatures, and all of the snubbers in that area were subsequently replaced with hydraulic snubbers. Another was the result of the snubber being stepped on, and a third occurred because of improper installation and/or removal of the snubber for testing. The cause of the fourth failure was unable to be determined. No irregularities were noted during snubber teardown. Therefore, the extension of the surveillance interval is extremely unlikely to result in additional snubber failures. This surveillance consists of a 10% sampling of safety-related snubbers as required by Technical Specification SR 4.7.9.e.
14. Emergency Diesel Generator Maintenance Inspections. Division 1 is due 10/5/95 and critical 2/19/96, Division 2 is due 9/5/95 and critical 1/20/96, and Division 3 is due 9/4/95 and critical 1/19/96. Also, due to Unit 2 requirements for diesel generator operability, Unit 2 is also affected and requires surveillance interval extension, related to Divisions 1 and 2. These surveillances consist of all regularly scheduled preventative maintenance on the EDG's as recommended by the manufacturer. The maintenance and inspection requirements as determined by the EMD Diesel Generator Owner's Group are met if the critical date for this surveillance is extended. The 18-month intervals were originally established to coincide with refuel cycles and can be extended to coincide with 24 month refuel intervals per EMD Owners Group recommendations. These surveillances are currently required to be performed per Technical Specification SRs 4.8.1.1.2.d.1 and 4.8.1.2 on an 18 month frequency.

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15. Trip and Trip Bypass Tests for Diesel Generators 0, 1A, and 1B and Division 3 trip test with Diesel Generator 1B Operating in a Test Mode. Diesel generator 0 is due 10/10/95 and critical 2/24/96, diesel generator 1A is due 9/27/95 and critical 2/11/96, and diesel generator 1B is due 9/17/95 and critical 2/1/96. Also, due to Unit 2 requirements for diesel generator operability, Unit 2 is also affected and requires surveillance interval extension, related to Diesel Generators 0 and 1A. These surveillances are functional tests of the EDG trip logic which consists of highly reliable switches, relays, and wiring. These tests do not test equipment susceptible to setpoint drift and have not had a high failure rate. There have been no failures of these surveillances since they have been written. These surveillances are required by Technical Specification SRs 4.8.1.1.2.d.7, 4.8.1.1.2.d.13, and 4.8.1.2 and the Division 3 test of SR 4.8.1.1.2.d.11.b.

16. Division 2 Battery Charger Test is due 9/23/95 and critical 2/7/96. Also, due to Unit 2 Technical Specification 3/4.8.2.3, D.C. Distribution - Operating, Limiting Condition for Operation, Unit 2 is also affected and requires surveillance interval extension, related to Division 2. This charger was installed during the Unit 1 fourth refueling outage, and all subsequent charger capacity surveillances have been completed satisfactorily. This division also has a spare charger, which is maintained and tested as safety-related, but does not currently meet Technical Specification operability requirements. The Division 1 Battery Charger Test is due 9/29/95 and critical 2/13/96. The last four battery charger tests were reviewed, and all were completed satisfactorily. Until the battery charger tests are performed, the routine weekly and quarterly surveillances will verify normal operation of the battery chargers. Also, indication and alarms are provided in the Main Control Room to verify normal D.C. voltages and currents are maintained. These surveillances are required every 18 months by Technical Specification SRs 4.8.2.3.2.c.4 and 4.8.2.4.2.

17. Division 1 Battery Service Test is due 10/1/95 and critical 2/15/96. This battery was replaced during the Unit 1 third refueling outage (1989). This surveillance (or the more restrictive battery performance test) has been successfully completed in every subsequent outage. A review of industry performance data identified no failures which would have prevented batteries from performing their design function. This surveillance is required by Technical Specification SRs 4.8.2.3.2.d. and 4.8.2.4.2.

18. Channel Functional Test of Thermal Overload Bypass Circuitry for HPCS, LPCS, and Primary and Secondary Containment Isolation Valve Groups 2 and 4. These tests are conducted in conjunction with and as part of the associated

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Logic System Functional Tests. See items 5 and 6 above for surveillance dates and justifications.

19. Items 1 and 5 above involve instrument calibration intervals. The normal calibration intervals are 18 months plus up to 22.5 months, based on the 25% interval allowance by specification 4.0.2. The maximum extension of these calibration intervals is 25.1 months or less, or 1.45 times the normal 18 month interval. The following provides general characteristics of instrument drift, etc.:
- a. The vendor instrument accuracy calculations are based on the random nature of time-based drift. In accordance with the current Instrument Society of America Standards, it is usually expected that those instrument uncertainties that a manufacturer specifies as having a plus or minus magnitude are random uncertainties. Additionally, random uncertainties are defined as zero-centered and are approximated by a normal distribution. Therefore, redundant channels are not expected to drift an equal amount in the same direction. To consider non-random drift is inconsistent with industry practice.
 - b. Current monitoring by channel checks of instrumentation and ongoing Technical Specification surveillance tests provide assurance that the equipment involved in the extended surveillance tests will remain in an operable condition until testing is performed during L1R07.
 - c. Periodic surveillance tests have been performed since the last refueling outage to monitor system and component performances and to detect any significant degradation. Surveillance testing will continue to be performed, during the requested extension interval, that provides added assurance that the reliability of equipment associated with the extended surveillances will not be significantly degraded by this one-time extension.

For surveillances that primarily involve non-instrument type components, item c. above will apply in addition to the individual discussions for each surveillance or group of surveillances.