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LaSalle Generating Station
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ComEd

May 13, 1997

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

Subject: Submittal of Relief Request CR-19 Revision 1
LaSalle County Station, Units 1 and 2
Facility Operating License NPF-11 and NPF-18
NRC Docket Nos. 50-373 and 50-374

In a letter from John B. Hosmer (ComEd), dated April 10, 1997, ComEd requested relief from immediate compliance with the applicable repair and replacement requirements of the ASME Boiler and Pressure Vessel Code Section XI, 1992 Edition with the 1992 Addendum, for Class MC and CC pressure retaining components. Relief was requested for several of ComEd's nuclear units, with emphasis placed on LaSalle Units 1 & 2 due to unit outage status and ongoing containment tendon testing and inspections.

During the Staff's review of Relief Request, CR-19 Revision 0, for LaSalle Unit 1 & 2, a telephone conversation was held on April 29, 1997, in which the Staff requested additional information regarding CR-19 Revision 0. The Staff requested that LaSalle provide:

1. Clarification that CR-19 requests relief from both the repair, and the replacement requirements of the Code.
2. Confirmation that ComEd's Quality Assurance Program meets the requirements of 10 CFR 50 Appendix B.
3. Additional detailed justification for granting relief until January 1, 1998.

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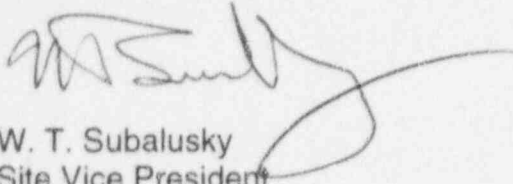
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4. Additional discussion regarding existing programs and procedures which will be used as alternatives to the Code Requirements, especially those associated with containment Post-Tensioning Tendons.

In order to provide the information requested, ComEd, LaSalle Station has revised Relief Request CR-19, which is provided as an attachment to this letter. The revision is identified in bold italics. It is believed that this revision adequately addresses the Staff's request for information in a format which will allow for NRC approval of CR-19 Revision 1, as soon as possible.

If there are any questions or comments concerning this letter, please refer them to Perry Barnes, Regulatory Assurance Supervisor, at (815) 357-6761, extension 2383.

Respectfully,



W. T. Subalusky
Site Vice President
LaSalle County Station

Enclosure

cc: A. B. Beach, NRC Region III Administrator
M. P. Huber, NRC Senior Resident Inspector - LaSalle
D. M. Skay, Project Manager - NRR - LaSalle
F. Niziolek, Office of Nuclear Facility Safety - IDNS

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COMPONENT IDENTIFICATION

Code Class: MC, CC
References: IWA-4000 & 7000
IWE-4000 & 7000
IWL-4000 & 7000
Examination Category: E-A, E-B, E-C, E-D, E-F, E-G, and E-P
L-A, L-B
Item Number: All Class MC and CC components listed in Table IWE-2500-1 and IWL-2500-1
Description: ASME Section XI Repair and Replacement Procedures for IWE and IWL Components
Component Numbers: All Class MC and CC components subject to Repair and Replacement rules of IWA-4000 & 7000, IWE-4000 & 7000, and IWL-4000 & 7000

CODE REQUIREMENT

10 CFR 50.55a(g)(4)(v) requires Class MC and CC pressure retaining components and their integral attachments to meet the applicable repair and replacement requirements of the ASME Boiler and Pressure Vessel Code Section XI, 1992 Edition with the 1992 Addenda, Subsections IWA-4000 & 7000, IWE-4000 & 7000, and IWL-4000 & 7000.

BASIS FOR RELIEF

Relief is requested from immediate compliance with the repair and replacement requirements of Subsections IWE and IWL. Pursuant to 10 CFR 50.55a(a)(3)(ii), relief is requested on the basis that immediate compliance with the aforementioned requirements would result in unusual difficulty without a compensating increase in the level of quality and safety.

A revision to 10 CFR 50.55a was published on August 8, 1996, which endorses Subsections IWE and IWL of the ASME Boiler and Pressure Vessel Code Section XI, 1992 Edition with the 1992 Addenda. This revision requires the completion of an expedited examination by September 9, 2001. However, in a letter to the Nuclear Energy Institute (NEI) dated November 6, 1996, the NRC staff clarifies that all repair and replacement activities within the scope of Subsections IWE and IWL which are conducted after September 9, 1996 must be conducted in accordance with the applicable rules of Subsections IWE and IWL of ASME Section XI, 1992 Edition with the 1992 Addenda.

Immediate compliance with the repair and replacement rules of ASME Section XI, 1992 Edition with the 1992 Addenda for IWE *and* IWL components is impractical because substantial time and resources must be expended for the following major efforts:

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1. CONTAINMENT STRUCTURE COMPONENT CLASSIFICATION: The Station materials, erection, fabrication procedures and testing of containment structures at LaSalle County are in general conformance to the following rules;
 - a. Containment steel liner, backed by concrete, containment steel boundaries, not backed by concrete, and penetrations were constructed to the rules of ASME Section III, Division I, Subsection NE, 1971 Edition with the Summer 1972 Addenda.
 - b. Containment concrete and reinforcing steel was constructed to the rules of ACI-318, 1971 and ASTM A615-1972.
 - c. Containment Post Tensioning System is in general conformance with the rules of ASME Section III, Division II, Subsections CC-2400, CC-4400 and CC-5400, July 1, 1977.
 - d. Containment structural steel was constructed to the rules of AISC Manual-1969.

In order to comply with 10 CFR 50.55a(g)(4)(v), it will be necessary to identify and reclassify all containment components to Class MC and CC classification criteria. This effort will include the retrieval and review of all applicable fabrication and installation documentation, the development of a basis document to identify the correct classification boundaries and the eventual development of an Inservice inspection program to govern all IWE/IWL-related activities at LaSalle Station.

2. PROCEDURE REVISIONS: The requirements of Subsections IWE and IWL must be incorporated into applicable station procedures. The current Inservice Inspection program, (which includes the repair and replacement program), for LaSalle Station is currently based on the rules of ASME Section XI, 1989 Edition, and only addresses the InService inspection requirements for Class 1, 2, and 3 pressure retaining components and component supports. Therefore, various procedures that control Code repair and replacement activities must be revised to incorporate the unique requirements of Subsections IWE and IWL.
3. EXAMINER TRAINING AND CERTIFICATION: The unique examiner qualification required by Subsections IWE and IWL must be incorporated into the existing Commonwealth Edison (ComEd) certification and training program. The existing ComEd certification and training program only addresses the certification requirements for Class 1, 2 and 3 pressure retaining components and component supports. The ComEd certification and training program must be revised to incorporate the unique requirements of Subsections IWE and IWL.
4. LASALLE RESTART PLAN: *Currently, both LaSalle units are in extended outages for refueling and maintenance. It is fully expected that both units will remain in these extended outages during the entire period for which this relief is requested. Many of the resources that would need to be utilized for the sole purpose of meeting these new Code Requirements are*

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also actively involved in implementing a variety of actions associated with these dual unit outages, including implementation of the LaSalle Station Restart Plan. This effort further extends the time period needed to adequately address the Code Requirements in order to assure quality as well as compliance.

Since the containment structures at LaSalle Station were constructed to the rules of ASME Section III, ACI-318-1971, ASTM A615-1972 and AISC Manual-1969, all repair and replacement activities conducted on these components have been subjected to the ComEd Quality Assurance Manual (Commonwealth Edison Company, Topical Report CE-1-A, *Section 2, 3.1*) The ComEd Quality Assurance Manual requires repair and replacement activities to be conducted in accordance with the original design specifications using approved procedures. This approach assures applicable design bases are maintained. *As stated in ComEd Quality Assurance Program Topical Report CE-1-A, Revision 65, approved by the October 20, 1994, George F. Dick, Jr. letter to D.C. Farrar, the ComEd Quality Assurance Program complies with the quality requirements of 10 CFR 50, Appendix B, ASME Section III NCA-4000, and ANSI/ASME NQA-1. Currently ComEd is working to minor revision 65d, dated February 10, 1997. (Minor revisions do not require NRC Review and approval since they do not involve a reduction in commitments).* Additionally, the containment structure integrity is verified by: the periodic pressure tests in accordance with 10 CFR 50, Appendix J, Option B, *and the surveillance of the post-tensioning system. Post-tensioning system testing and examinations are performed in accordance with Technical Specification required programs, LaSalle Administrative Procedure LAP-100-51, "Inservice Inspection Program for Post-Tensioning Tendons", and implementing procedure, LaSalle Technical Surveillance LTS-1000-1, "Inservice Inspection of Post-Tensioning Tendons". These approved procedures incorporate the requirements of NRC Regulatory Guide 1.35 Revision 3, "Inservice Inspection of UngROUTED Tendons in Prestressed Concrete Containments".*

For the above reasons, the immediate application of the requirements of Subsections IWA-4000 & 7000, IWE-4000 & 7000, and IWL-4000 & 7000 imposes added administrative burden (such as requirement for a repair/replacement plan and NIS-2 form) without providing a compensating increase in the level of quality or safety.

PROPOSED ALTERNATE PROVISIONS

Until December 31, 1997, all repair and replacement activities conducted on applicable Class MC and CC pressure retaining components and their integral attachments at LaSalle Station will be performed in accordance with the existing ComEd QA Program requirements. Compliance with ASME Section XI, 1992 Edition with the 1992 Addenda, Subsections IWA-4000 & 7000, IWE-4000 & 7000, and IWL-4000 & 7000 will begin on January 1, 1998.

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Should the need arise to complete Repair/Replacement activities on any Class MC and CC pressure retaining components or their integral attachments prior to January 1, 1998, these activities will be controlled using approved Nuclear Work Requests in accordance with LaSalle Administrative Procedure LAP-1300-1, "Action/Work Request Processing". These Nuclear Work Requests will be classified as "Nuclear Safety Related", and thus, their preparation, review, approval, implementation and associated post Repair/Replacement testing is governed by the ComEd QA Manual (Commonwealth Edison Company, Topical Report CE-I-A, Section 2, 3.1). The ComEd Quality Assurance Program complies with the quality requirements of 10 CFR 50 Appendix B, ASME Section III NCA-4000, and ANSI/ASME NQA-1. Post-tensioning system testing and examinations will be performed in accordance with Technical Specification required programs, LaSalle Administrative Procedure LAP-100-51, "Inservice Inspection Program for Post-Tensioning Tendons", and implementing procedure, LaSalle Technical Surveillance LTS-1000-1, "Inservice Inspection of Post-Tensioning Tendons. These approved procedures incorporate the requirements of NRC Regulatory Guide 1.35 Revision 3, "Inservice Inspection of UngROUTED Tendons in Prestressed Concrete Containments".

APPLICABLE TIME PERIOD

Relief is requested for the second ten-year interval of the Inservice Inspection Program for LaSalle Units 1 and 2 until December 31, 1997.