ATTACHMENT B
PROPOSED AMENDMENTS TO THE
LICENSE/TECHNICAL SPECIFICATIONS

NPF-11	NPF-18
3/4 3-11*	3/4 3-11*
3/4 3-14	3/4 3-14
3/4 3-20*	3/4 3-20*
3/4 3-22	3/4 3-22
B 3/4 3-2*	B 3/4 3-2*
B 3/4 3-2a	B 3/4 3-2a

For Information Only. No changes

TABLE 3.3.2-1

ISOLATION ACTUATION INSTRUMENTATION

TRIP FUNCTION	VALVE GROUPS OPERATED BY SIGNAL	MINIMUM OPERABLE CHANNELS PER TRIP SYSTEM (b)	APPLICABLE OPERATIONAL CONDITION	ACTION
A. AUTOMATIC INITIATION				
1. PRIMARY CONTAINMENT ISOLATION				
a. Reactor Vessel Water Level				
(1) Low, Level 3	7	2	1, 2, 3	20
(2) Low Low, Level 2	2, 3	2	1, 2, 3	20
(3) Low Low Low, Level 1	1, 10	2	1, 2, 3	20
b. Drywell Pressure - High	2, 7, 10	2	1, 2, 3	20
c. Main Steam Line				
1) DELETED				
2) Pressure - Low	1	2	1	23
3) Flow - High	1	2/line[d]	1, 2, 3	21
d. DELETED				
e. Main Steam Line Tunnel ΔTemperature - High	1	2	1[(i)(j)] 2[(i)(j)], 3[(i)(j)]	21
f. Condenser Vacuum - Low	1	2	1, 2*, 3*	21
2. SECONDARY CONTAINMENT ISOLATION				
a. Reactor Building Vent Exhaust Plenum Radiation - High	4[(c)(e)]	2	1, 2, 3 and **	24
b. Drywell Pressure - High	4[(c)(e)]	2	1, 2, 3	24
c. Reactor Vessel Water Level - Low Low, Level 2	4[(c)(e)]	2	1, 2, 3, and *	24
d. Fuel Pool Vent Exhaust Radiation - High	4[(c)(e)]	2	1, 2, 3, and **	24

ISOLATION ACTUATION INSTRUMENTATION

ACTION

ACTION 20 - Be in at least HOT SHUTDOWN within 12 hours and in COLD SHUTDOWN within the next 24 hours.

ACTION 21 - Be in at least STARTUP with the associated isolation valves closed within 6 hours or be in at least HOT SHUTDOWN within 12 hours and in COLD SHUTDOWN within the next 24 hours.

ACTION 22 - Close the affected system isolation valves within 1 hour and declare the affected system inoperable.

ACTION 23 - Be in at least STARTUP within 6 hours..

ACTION 24 - Establish SECONDARY CONTAINMENT INTEGRITY with the standby gas treatment system operating within 1 hour.

ACTION 25 - Lock the affected system isolation valves closed within 1 hour and declare the affected system inoperable.

ACTION 26 - Provided that the manual initiation function is OPERABLE for each other group valve, inboard or outboard, as applicable, in each line, restore the manual initiation function to OPERABLE status within 24 hours; otherwise, restore the manual initiation function to OPERABLE status within 8 hours; otherwise:

a. Be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours, or

b. Close the affected system isolation valves within the next hour and declare the affected system inoperable.

not full open

NOTES

* May be bypassed with reactor steam pressure ≤ 1043 psig and all turbine stop valves ~~closed~~.

** When handling irradiated fuel in the secondary containment and during CORE ALTERATIONS and operations with a potential for draining the reactor vessel.

\# During CORE ALTERATIONS and operations with a potential for draining the reactor vessel.

(a) Deleted.

(b) A channel may be placed in an inoperable status for up to 6 hours for required surveillance without placing the channel in the tripped condition provided at least one other OPERABLE channel in the same trip system is monitoring that parameter. In addition for those trip systems with a design providing only one channel per trip system, the channel may be placed in an inoperable status for up to 8 hours for required surveillance testing without placing the channel in the tripped condition provided that the redundant isolation valve, inboard or outboard, as applicable, in each line is operable and all required actuation instrumentation for the redundant valve is OPERABLE, or place the trip system in the tripped condition.

(c) Also actuates the standby gas treatment system.

(d) A channel is OPERABLE if 2 of 4 instruments in that channel are OPERABLE.

(e) Also actuates secondary containment ventilation isolation dampers per Table 3.6.5.2-1.

(f) Closes only RWCU system inlet outboard valve.

TABL 3.2.1-1

ISOLATION ACTUATION INSTRUMENTATION SURVEILLANCE REQUIREMENTS

TRIP FUNCTION	CHANNEL CHECK	CHANNEL FUNCTIONAL TEST	CHANNEL CALIBRATION	OPERATIONAL CONDITIONS FOR WHICH SURVEILLANCE REQUIRED
A. AUTOMATIC INITIATION				
1. PRIMARY CONTAINMENT ISOLATION				
a. Reactor Vessel Water Level				
1) Low, Level 3	S	Q	R	1, 2, 3
2) Low Low, Level 2	NA	Q	R	1, 2, 3
3) Low Low Low, Level 1	S	Q	R	1, 2, 3
b. Drywell Pressure - High	NA	Q	Q	1, 2, 3
c. Main Steam Line				
1) DELETED				
2) Pressure - Low	NA	Q	Q	1
3) Flow - High	NA	Q	R	1, 2, 3
d. DELETED				
e. Condenser Vacuum - Low	NA	Q	Q	1, 2*, 3*
f. Main Steam Line Tunnel Δ Temperature - High	NA	Q	R	1, 2, 3
2. SECONDARY CONTAINMENT ISOLATION				
a. Reactor Building Vent Exhaust Plenum Radiation - High	S	Q	R	1, 2, 3 and **
b. Drywell Pressure - High	NA	Q	Q	1, 2, 3
c. Reactor Vessel Water Level - Low Low, Level 2	NA	Q	R	1, 2, 3, and *
d. Fuel Pool Vent Exhaust Radiation - High	S	Q	R	1, 2, 3 and **
3. REACTOR WATER CLEANUP SYSTEM ISOLATION				
a. Δ Flow - High	S	Q	R	1, 2, 3
b. Heat Exchanger Area Temperature - High	NA	Q	Q	1, 2, 3
c. Heat Exchanger Area Ventilation ΔT - High	NA	Q	Q	1, 2, 3
d. SLCS Initiation	NA	R	NA	1, 2, 3
e. Reactor Vessel Water Level - Low Low, Level 2	NA	Q	R	1, 2, 3

For Information Only. No changes

TABLE 4.3.2.1-1 (Continued)

ISOLATION ACTUATION INSTRUMENTATION SURVEILLANCE REQUIREMENTS

TRIP FUNCTION	CHANNEL CHECK	CHANNEL FUNCTIONAL TEST	CHANNEL CALIBRATION	OPERATIONAL CONDITIONS FOR WHICH SURVEILLANCE REQUIRED
6. RHR SYSTEM SHUTDOWN COOLING MODE ISOLATION				
a. Reactor Vessel Water Level - Low, Level 3	S	Q	R	1, 2, 3
b. Reactor Vessel (RHR Cut-in Permissive) Pressure - High	NA	Q	Q	1, 2, 3
c. RHR Pump Suction Flow - High	NA	Q	Q	1, 2, 3
d. RHR Area Temperature - High	NA	Q	Q	1, 2, 3
e. RHR Equipment Area ΔT - High	NA	Q	Q	1, 2, 3
B. MANUAL INITIATION				
1. Inboard Valves	NA	R	NA	1, 2, 3
2. Outboard Valves	NA	R	NA	1, 2, 3
3. Inboard Valves	NA	R	NA	1, 2, 3 and **,#
4. Outboard Valves	NA	R	NA	1, 2, 3 and **,#
5. Inboard Valves	NA	R	NA	1, 2, 3
6. Outboard Valves	NA	R	NA	1, 2, 3
7. Outboard Valve	NA	R	NA	1, 2, 3

Not required when all turbine stop valves are not full open.

* When reactor steam pressure ≥ 1043 psig and/or any turbine stop valve is open.

** When handling irradiated fuel in the secondary containment and during CORE ALTERATIONS and operations with a potential for draining the reactor vessel.

During CORE ALTERATIONS and operations with a potential for draining the reactor vessel.

3/4.3.1 REACTOR PROTECTION SYSTEM INSTRUMENTATION (Continued)

Functional Units, response time testing for the remaining channel components, including any analog trip units, is required. This allowance is supported by NEDO-32291-A, "System Analyses for the Elimination of Selected Response Time Testing Requirements," October 1995.

Response time may be demonstrated by any series of sequential, overlapping or total channel test measurement, provided such tests demonstrate the total channel response time as defined. Sensor response time verification may be demonstrated by either (1) inplace, onsite or offsite test measurements, or (2) utilizing replacement sensors with certified response times.

3/4.3.2 ISOLATION ACTUATION INSTRUMENTATION

This specification ensures the effectiveness of the instrumentation used to mitigate the consequences of accidents by prescribing the OPERABILITY trip setpoints and response times for isolation of the reactor systems. When necessary, one channel may be inoperable for brief intervals to conduct required surveillance. Both channels of each trip system for the main steam tunnel ventilation system differential temperature may be placed in an inoperable status for up to 4 hours for required reactor building ventilation system maintenance and testing and 12 hours due to loss of reactor building ventilation or for the required secondary containment Leak Rate test without placing the trip system in the tripped condition. This will allow for maintaining the reliability of the ventilation system and secondary containment. Specified surveillance intervals and surveillance and maintenance outage times have been determined in accordance with NEDC-30851P-A, Supplement 2, "Technical Specification Improvement Analyses for BWR Isolation Instrumentation Common to RPS and ECCS Instrumentation", March 1989, and with NEDC-31677P-A, "Technical Specification Improvement Analysis for BWR Isolation Actuation Instrumentation", July 1990. When a channel is placed in an inoperable status solely for performance of required surveillances, entry into LCO and required ACTIONS may be delayed, provided the associated function maintains primary containment isolation capability. Some of the trip settings may have tolerances explicitly stated where both the high and low values are critical and may have a substantial effect on safety. The setpoints of other instrumentation, where only the high or low end of the setting have a direct bearing on safety, are established at a level away from the normal operating range to prevent inadvertent actuation of the systems involved.

Except for the MSIVs, the safety analysis does not address individual sensor response times or the response times of the logic systems to which the sensors are connected. For A.C. operated valves, it is assumed that the A.C.

Insert 'A'

ATTACHMENT B
PROPOSED AMENDMENTS TO THE
LICENSE/TECHNICAL SPECIFICATIONS

INSERT A

TS Bases insert:

The Condenser Vacuum - Low Function isolates group 1 valves and is provided to prevent overpressurization of the main condenser in the event of a loss of the main condenser vacuum. Since the integrity of the condenser is an assumption in offsite dose calculations, the Condenser Vacuum - Low Function is assumed to be OPERABLE and capable of initiating closure of the MSIVs. The closure of the MSIVs is initiated to prevent the addition of steam that would lead to additional condenser pressurization and possible rupture of the diaphragm installed to protect the turbine exhaust hood, thereby preventing a potential radiation leakage path following an accident.

As noted (footnote * to Tables 3.3.2-1 and 4.3.2.1-1), the channels are not required to be OPERABLE in MODES 2 and 3, when all turbine stop valves (TSVs) are not full open, since the potential for condenser overpressurization is minimized. Switches are provided to manually bypass the channels when all TSVs are not full open. TSV position setpoints are controlled by TS 2.2.1 and surveillances are performed per TS 4.3.1. The TSV closure scram bypass below 30% power (TS Table 3.3.1-1, Note i) does not affect the TSV position interlocks for the condenser vacuum - low bypass logic.

For Information Only. No changes

3/4.3.2 ISOLATION ACTUATION INSTRUMENTATION (Continued)

power supply is lost and is restored by startup of the emergency diesel generators. In this event, a time of 13 seconds is assumed before the valve starts to move. The safety analysis considers an allowable inventory loss which in turn determines the valve speed in conjunction with the 13 second delay.

For the sensors associated with MSIV isolation, instrumentation channels are not required to be response time tested. Response time testing for the remaining channel components, including any analog trip units, is required. This allowance is supported by NEDO-32291-A, "System Analyses for the Elimination of Selected Response Time Testing Requirements," October 1995.

3/4.3.3 EMERGENCY CORE COOLING SYSTEM ACTUATION INSTRUMENTATION

The emergency core cooling system actuation instrumentation is provided to initiate actions to mitigate the consequences of accidents that are beyond the ability of the operator to control. This specification provides the OPERABILITY requirements, trip setpoints and response times that will ensure effectiveness of the systems to provide the design protection. Although the instruments are listed by system, in some cases the same instrument may be used to send the actuation signal to more than one system at the same time.

Per Note #, the ECCS actuation instrument channels are not required to be response time tested. The overall ECCS response time requirement, which includes diesel generator injection valves, pumps, and other components, still applies. This allowance is supported by NEDO-32291-A, "System Analyses for the Elimination of Selected Response Time Testing Requirements," October 1995.

Specified surveillance intervals and surveillance and maintenance outage times have been determined in accordance with NEDC-30936P-A, "Technical Specification Improvement Methodology (With Demonstration for BWR ECCS Actuation Instrumentation)", Parts 1 and 2, December 1988, and RE-025 Revision 1, "Technical Specification Improvement Analysis for the Emergency Core Cooling System Actuation Instrumentation for LaSalle County Station, Units 1 and 2", April 1991. When a channel is placed in an inoperable status solely for performance of required surveillances, entry into LCO and required ACTIONS may be delayed, provided the associated function maintains ECCS initiation capability.

For Information Only. No changes

TABLE 3.3.2-1

ISOLATION ACTUATION INSTRUMENTATION

TRIP FUNCTION	VALVE GROUPS OPERATED BY SIGNAL	MINIMUM OPERABLE CHANNELS PER TRIP SYSTEM (b)	APPLICABLE OPERATIONAL CONDITION	ACTION
A. AUTOMATIC INITIATION				
1. PRIMARY CONTAINMENT ISOLATION				
a. Reactor Vessel Water Level				
(1) Low, Level 3	7	2	1, 2, 3	20
(2) Low Low, Level 2	2, 3	2	1, 2, 3	20
(3) Low Low Low, Level 1	1, 10	2	1, 2, 3	20
b. Drywell Pressure - High	2, 7, 10	2	1, 2, 3	20
c. Main Steam Line				
1) DELETED				
2) Pressure - Low	1	2	1	23
3) Flow - High	1	2/line[d]	1, 2, 3	21
d. DELETED				
e. Main Steam Line Tunnel ΔTemperature - High	1	2	1[(i)(j)], 2[(i)(j)], 3[(i)(j)]	21
f. Condenser Vacuum - Low	1	2	1, 2*, 3*	21
2. SECONDARY CONTAINMENT ISOLATION				
a. Reactor Building Vent Exhaust Plenum Radiation - High	4[(c)(e)]	2	1, 2, 3 and **	24
b. Drywell Pressure - High	4[(c)(e)]	2	1, 2, 3	24
c. Reactor Vessel Water Level - Low Low, Level 2	4[(c)(e)]	2	1, 2, 3, and #	24
d. Fuel Pool Vent Exhaust Radiation - High	4[(c)(e)]	2	1, 2, 3, and **	24

ACTION STATEMENTS

ACTION 20 - Be in at least HOT SHUTDOWN within 12 hours and in COLD SHUTDOWN within the next 24 hours.

ACTION 21 - Be in at least STARTUP with the associated isolation valves closed within 6 hours or be in at least HOT SHUTDOWN within 12 hours and in COLD SHUTDOWN within the next 24 hours.

ACTION 22 - Close the affected system isolation valves within 1 hour and declare the affected system inoperable.

ACTION 23 - Be in at least STARTUP within 6 hours.

ACTION 24 - Establish SECONDARY CONTAINMENT INTEGRITY with the standby gas treatment system operating within 1 hour.

ACTION 25 - Lock the affected system isolation valves closed within 1 hour and declare the affected system inoperable.

ACTION 26 - Provided that the manual initiation function is OPERABLE for each other group valve, inboard or outboard, as applicable, in each line, restore the manual initiation function to OPERABLE status within 24 hours; otherwise, restore the manual initiation function to OPERABLE status within 8 hours; otherwise:

a. Be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours, or

b. Close the affected system isolation valves within the next hour and declare the affected system in operable.

not full open

TABLE NOTATIONS

* May be bypassed with reactor steam pressure < 1043 psig and all turbine stop valves ~~closed~~.

** When handling irradiated fuel in the secondary containment and during CORE ALTERATIONS and operations with a potential for draining the reactor vessel.

During CORE ALTERATIONS and operations with a potential for draining the reactor vessel.

(a) Deleted.

(b) A channel may be placed in an inoperable status for up to 6 hours for required surveillance without placing the channel in the tripped condition provided at least one other OPERABLE channel in the same trip system is monitoring that parameter. In addition for those trip systems with a design providing only one channel per trip system, the channel may be placed in an inoperable status for up to 8 hours for required surveillance testing without placing the channel in the tripped condition provided that the redundant isolation valve, inboard or outboard, as applicable, in each line is operable and all required actuation instrumentation for that redundant valve is OPERABLE, or place the trip system in the tripped condition.

(c) Also actuates the standby gas treatment system.

(d) A channel is OPERABLE if 2 of 4 instruments in that channel are OPERABLE.

(e) Also actuates secondary containment ventilation isolation dampers per Table 3.6.5.2-1.

(f) Closes only RWCU system inlet outboard valve.

TABLE 3.2.1-1

ISOLATION ACTUATION INSTRUMENTATION SURVEILLANCE REQUIREMENTS

TRIP FUNCTION	CHANNEL CHECK	CHANNEL FUNCTIONAL TEST	CHANNEL CALIBRATION	OPERATIONAL CONDITIONS FOR WHICH SURVEILLANCE REQUIRED
A. AUTOMATIC INITIATION				
1. PRIMARY CONTAINMENT ISOLATION				
a. Reactor Vessel Water Level				
1) Low, Level 3	S	Q	R	1, 2, 3
2) Low Low, Level 2	NA	Q	R	1, 2, 3
3) Low Low Low, Level 1	S	Q	k	1, 2, 3
b. Drywell Pressure - High	NA	Q	Q	1, 2, 3
c. Main Steam Line				
1) DELETED				
2) Pressure - Low	NA	Q	Q	1
3) Flow - High	NA	Q	R	1, 2, 3
d. DELETED				
e. Condenser Vacuum - Low	NA	Q	Q	1, 2*, 3*
f. Main Steam Line Tunnel Δ Temperature - High	NA	Q	R	1, 2, 3
2. SECONDARY CONTAINMENT ISOLATION				
a. Reactor Building Vent Exhaust Plenum Radiation - High	S	Q	R	1, 2, 3 and **
b. Drywell Pressure - High	NA	Q	Q	1, 2, 3
c. Reactor Vessel Water Level - Low Low, Level 2	NA	Q	R	1, 2, 3, and #
d. Fuel Pool Vent Exhaust Radiation - High	S	Q	R	1, 2, 3 and **
3. REACTOR WATER CLEANUP SYSTEM ISOLATION				
a. Δ Flow - High	S	Q	R	1, 2, 3
b. Heat Exchanger Area Temperature - High	NA	Q	Q	1, 2, 3
c. Heat Exchanger Area Ventilation ΔT - High	NA	Q	Q	1, 2, 3
d. SLCS Initiation	NA	R	NA	1, 2, 3
e. Reactor Vessel Water Level - Low Low, Level 2	NA	Q	R	1, 2, 3

For Information Only. No changes

TABLE 4.3.2.1-1 (Continued)

ISOLATION ACTUATION INSTRUMENTATION SURVEILLANCE REQUIREMENTS

TRIP FUNCTION	CHANNEL CHECK	CHANNEL FUNCTIONAL TEST	CHANNEL CALIBRATION	OPERATIONAL CONDITIONS FOR WHICH SURVEILLANCE REQUIRED
6. RHR SYSTEM SHUTDOWN COOLING MODE ISOLATION				
a. Reactor Vessel Water Level - Low, Level 3	S	Q	R	1, 2, 3
b. Reactor Vessel (RHR Cut-in Permissive) Pressure - High	NA	Q	Q	1, 2, 3
c. RHR Pump Suction Flow - High	NA	Q	Q	1, 2, 3
d. RHR Area Temperature - High	NA	Q	Q	1, 2, 3
e. RHR Equipment Area ΔT - High	NA	Q	Q	1, 2, 3
B. MANUAL INITIATION				
1. Inboard Valves	NA	R	NA	1, 2, 3
2. Outboard Valves	NA	R	NA	1, 2, 3
3. Inboard Valves	NA	R	NA	1, 2, 3 and **, #
4. Outboard Valves	NA	R	NA	1, 2, 3 and **, #
5. Inboard Valves	NA	R	NA	1, 2, 3
6. Outboard Valves	NA	R	NA	1, 2, 3
7. Outboard Valve	NA	R	NA	1, 2, 3

*When reactor steam pressure > 1043 psig and/or any turbine stop valve is open.
**When handling irradiated fuel in the secondary containment and during CORE ALTERATIONS and operations with a potential for draining the reactor vessel.
#During CORE ALTERATIONS and operations with a potential for draining the reactor vessel.

Not required when all turbine stop valves are not full open.

3/4.3.1 REACTOR PROTECTION SYSTEM INSTRUMENTATION (Continued)

Functional Units, response time testing for the remaining channel components, including any analog trip units, is required. This allowance is supported by NEDO-32291-A, "System Analyses for the Elimination of Selected Response Time Testing Requirements," October 1995.

Response time may be demonstrated by any series of sequential, overlapping or total channel test measurement, provided such tests demonstrate the total channel response time as defined. Sensor response time verification may be demonstrated by either (1) inplace, onsite or offsite test measurements, or (2) utilizing replacement sensors with certified response times.

3/4.3.2 ISOLATION ACTUATION INSTRUMENTATION

This specification ensures the effectiveness of the instrumentation used to mitigate the consequences of accidents by prescribing the OPERABILITY trip setpoints and response times for isolation of the reactor systems. When necessary, one channel may be inoperable for brief intervals to conduct required surveillance. Both channels of each trip system for the main steam tunnel ventilation system differential temperature may be placed in an inoperable status for up to 4 hours for required reactor building ventilation system maintenance and testing and 12 hours due to loss of reactor building ventilation or for the required secondary containment Leak Rate test without placing the trip system in the tripped condition. This will allow for maintaining the reliability of the ventilation system and secondary containment. Specified surveillance intervals and surveillance and maintenance outage times have been determined in accordance with NEDC-30851P-A, Supplement 2, "Technical Specification Improvement Analyses for BWR Isolation Instrumentation Common to RPS and ECCS Instrumentation", March 1989, and with NEDC-31677P-A, "Technical Specification Improvement Analysis for BWR Isolation Actuation Instrumentation", July 1990. When a channel is placed in an inoperable status solely for performance of required surveillances, entry into LCO and required ACTIONS may be delayed, provided the associated function maintains primary containment isolation capability. Some of the trip settings may have tolerances explicitly stated where both the high and low values are critical and may have a substantial effect on safety. The setpoints of other instrumentation, where only the high or low end of the setting have a direct bearing on safety, are established at a level away from the normal operating range to prevent inadvertent actuation of the systems involved.

Except for the MSIVs, the safety analysis does not address individual sensor response times or the response times of the logic systems to which the sensors are connected. For A.C. operated valves, it is assumed that the A.C.

Insert 'A'

ATTACHMENT B
PROPOSED AMENDMENTS TO THE
LICENSE/TECHNICAL SPECIFICATIONS

INSERT A

TS Bases insert:

The Condenser Vacuum - Low Function isolates group 1 valves and is provided to prevent overpressurization of the main condenser in the event of a loss of the main condenser vacuum. Since the integrity of the condenser is an assumption in offsite dose calculations, the Condenser Vacuum - Low Function is assumed to be OPERABLE and capable of initiating closure of the MSIVs. The closure of the MSIVs is initiated to prevent the addition of steam that would lead to additional condenser pressurization and possible rupture of the diaphragm installed to protect the turbine exhaust hood, thereby preventing a potential radiation leakage path following an accident.

As noted (footnote * to Tables 3.3.2-1 and 4.3.2.1-1), the channels are not required to be OPERABLE in MODES 2 and 3, when all turbine stop valves (TSVs) are not full open, since the potential for condenser overpressurization is minimized. Switches are provided to manually bypass the channels when all TSVs are not full open. TSV position setpoints are controlled by TS 2.2.1 and surveillances are performed per TS 4.3.1. The TSV closure scram bypass below 30% power (TS Table 3.3.1-1, Note i) does not affect the TSV position interlocks for the condenser vacuum - low bypass logic.

For Information Only. No changes

3/4.3.2 ISOLATION ACTUATION INSTRUMENTATION (Continued)

power supply is lost and is restored by startup of the emergency diesel generators. In this event, a time of 13 seconds is assumed before the valve starts to move. The safety analysis considers an allowable inventory loss which in turn determines the valve speed in conjunction with the 13 second delay.

For the sensors associated with MSIV isolation, instrumentation channels are not required to be response time tested. Response time testing for the remaining channel components, including any analog trip units, is required. This allowance is supported by NEDO-32291-A, "System Analyses for the Elimination of Selected Response Time Testing Requirements," October 1995.

3/4.3.3 EMERGENCY CORE COOLING SYSTEM ACTUATION INSTRUMENTATION

The emergency core cooling system actuation instrumentation is provided to initiate actions to mitigate the consequences of accidents that are beyond the ability of the operator to control. This specification provides the OPERABILITY requirements, trip setpoints and response times that will ensure effectiveness of the systems to provide the design protection. Although the instruments are listed by system, in some cases the same instrument may be used to send the actuation signal to more than one system at the same time.

Per note #, the ECCS actuation instrument channels are not required to be response time tested. The overall ECCS response time requirement, which includes diesel generator injection valves, pumps, and other components, still applies. This allowance is supported by NEDO-32291-A, "System Analyses for the Elimination of Selected Response Time Testing Requirements," October 1995.

ATTACHMENT C
SIGNIFICANT HAZARDS CONSIDERATION

Commonwealth Edison Company (ComEd) proposes to revise Appendix A, Technical Specifications of Facility Operating Licenses NPF-11 and NPF-18, LaSalle County Station Units 1 and 2. The proposed changes include changes to the Technical Specifications (TS) to modify the bypass logic for Main Steam Line Isolation Valve Isolation Actuation Instrumentation on Condenser Low Vacuum as stated in Note * of TS Tables 3.3.2-1 and 4.3.2.1-1. The TS affected is TS 3/4.3.2, Isolation Actuation Instrumentation. The proposed changes are supported by testing performed by General Electric in the 1970s.

The TS Table notes state that Condenser Vacuum - Low is bypassed when all turbine stop valves are closed, rather than when all turbine stop valves are not full open, which is more accurate. A change to these notes is proposed to correct this information.

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 reactor vessel steam dome pressure switches, which are proposed to be removed from the Main Steam Isolation Valve (MSIV) closure scram bypass logic and the Condenser Vacuum - Low MSLIV isolation bypass logic cause the above trip functions to become active when the reactor mode switch is not in the RUN position and reactor pressure is greater than 1043 psig. The setpoints of the reactor vessel steam dome pressure switches are the same as the reactor vessel steam dome pressure - high scram function. Also, any pressure transients as a result of MSIV closure when not in Operational Condition 1, Run mode, are minor due to low steam flow compared to the same event at rated power. Therefore, the reactor pressure switches being removed from the bypass logic of the MSIV closure scram has little or no affect on reactor startup, operation, shutdown, or analyzed accidents.

   The condenser vacuum - low isolation function bypass is interlocked by the same pressure switches that bypass the MSIV closure scram when the

reactor mode switch is not in the RUN position. In addition to reactor pressure not high, the bypass of the condenser vacuum - low is bypassed only if the reactor mode switch is not in the RUN position, all Turbine Stop Valves (TSVs) are not full open, and the keylock bypass switches are in BYPASS (one for each channel). With the reactor pressure interlock removed, the remaining interlocks assure that the condenser will not be overpressurized in Operational Conditions 2 and 3. The Reactor mode switch interlock limits reactor thermal power to less than about 12% in Operational Condition 2 (Control Rod withdrawal block on APRM High setpoint in Operational Conditions 2 and 5) and to much less than 1 % power when all control rods are fully inserted in Operational Condition 3 after initial thermal power decay due to decay heat following reactor shutdown. The Turbine bypass valves can not be opened with condenser vacuum low (approximately the same as the isolation setpoint, but different instrumentation). The Turbine Stop Valves remain closed with condenser vacuum low due to a turbine trip on low condenser vacuum. Therefore, the remaining bypass interlocks assure that the isolation of the main steam lines will occur when needed to prevent overpressurization of the main condenser when vacuum is low or gone.

The change to the position information in the TS Table notes for the TSV bypass interlock corrects misinformation in the TS. The design has always used contacts from the auxiliary relays associated with the "not-full-open" limit switches for the MSIV closure scram. Therefore, the setpoints are the same as the MSIV closure scram in TS 2.2.1. The setpoint in the notes * are made approximate to avoid conflict with the RPS setpoints, which are controlling. Also, this will allow surveillances for the RPS function for TSV closure scram will continue to be performed per TS 4.3.1 at the frequencies specified in TS Table 4.3.1.1-1.

The setpoint for the TSV interlock is not a critical parameter for the isolation bypass interlock, since the normal position of the TSVs with low condenser vacuum is fully closed. Therefore, the use of an approximate value is sufficient, since the actual setpoints and surveillances are controlled by other specifications.

The reactor pressure switches being removed from the above bypass circuits are not used for the mitigation of any analyzed accidents or transients and may actually decrease the probability of a scram or

isolation in Startup mode due to the potential for misoperation. Also, the correction to the TSV position in the bypass notes is more consistent with the actual setpoints, which are controlled by the Limiting Safety System Setting for RPS trip function due to TSV closure.

The rewording of Note * in TS Table 4.3.2.1-1 to be more like Note * in TS Table 3.3.2-1 helps avoid confusion due to wording differences and is an administrative type change.

Therefore, there is no 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 removal of the reactor pressure switches from the bypass logic for the MSIV closure scram function and the condenser vacuum - low MSLIV isolation function with a setpoint equal to the reactor pressure scram setpoint is not a significant change and does not alter the reactor modes in which the trips are or can be bypassed. When not in RUN mode, energy levels are low compared to events that could occur at rated power levels. These pressure switches only slightly change the bypass logic and do not affect the scram and isolation circuitry such that a new or different kind of accident would occur.

The correction of the TSV position interlock for the bypass function for the condenser vacuum - low MSLIV isolation is not a physical change to the plant, so no failure modes are affected or created.

The rewording of Note * in TS Table 4.3.2.1-1 to be more like Note * in TS Table 3.3.2-1 helps avoid confusion due to wording differences and is an administrative type change.

Therefore, the possibility of a new or different kind of accident is not created.

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

The removal of the reactor pressure switches from the bypass logic of the MSIV closure scram function and the bypass logic from the condenser vacuum - low MSLIV isolation function does not reduce the margin of safety, because the setpoints were not established from analyses that have been performed. The setpoints were set at the value of the reactor scram on high reactor pressure as a convenient setpoint out of the way of normal plant operation, rather than initially removing the bypass interlock.

Also, the hign reactor pressure scram is required to be operable in Operational Conditions 1, 2, and 3, and has no installed means of bypass, so the removal of the MSIV closure scram in Operational Conditions other than mode 1, Run mode becoming active due to high reactor pressure does not reduce the margin for reactor pressurization events.

The remaining bypass interlocks, associated with TSV position for the bypass of the condenser vacuum - low MSLIV isolation, assure that the main condenser will be protected from overpressurization events with low condenser vacuum. The TSVs are closed due to a main turbine trip with low condenser vacuum, so if the TSVs were to fail open, the MSLIV will occur in Operational Conditions 2 and 3 when required. The removal of the reactor pressure bypass interlock and the correction to the TSV position will not be a significant reduction in the margin of safety.

The rewording of Note * in TS Table 4.3.2.1-1 to be more like Note * in TS Table 3.3.2-1 helps avoid confusion due to wording differences and is an administrative type change.

Therefore, the proposed changes do not involve a significant reduction in the 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 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 the acceptance 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.