

ATTACHMENT B

**LASALLE COUNTY NUCLEAR POWER STATION
UNITS 1 AND 2**

**MARKED UP ANNOTATED COPY OF AFFECTED PAGES
FOR PROPOSED CHANGES TO**

**FACILITY OPERATING LICENSES
NPF-11 AND NPF-18**

APPENDIX A TECHNICAL SPECIFICATIONS

VENTILATION FILTER TESTING PROGRAM

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

NPF-11

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NPF-18

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- * There are no changes on these pages. They are only included for continuity.

CONTAINMENT SYSTEMS

DRYWELL AND SUPPRESSION CHAMBER PURGE SYSTEM

LIMITING CONDITION FOR OPERATION

3.6.1.8 The drywell and suppression chamber purge system may be in operation with the drywell and/or suppression chamber purge supply and exhaust butterfly isolation valves open for inerting, de-inerting and pressure control; Purging through the Standby Gas Treatment System shall be restricted to less than or equal to 90 hours per 365 days.

APPLICABILITY: OPERATIONAL CONDITIONS 1, 2 and 3.

ACTION:

any
With a drywell and/or suppression chamber purge supply and/or exhaust butterfly isolation valve open for other than inerting, de-inerting or pressure control, close the butterfly valve(s) within one hour or be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.

SURVEILLANCE REQUIREMENTS

4.6.1.8.1 The cumulative time that the drywell and suppression chamber purge system has been in operation purging through the Standby Gas Treatment System shall be verified to be less than or equal to 90 hours per 365 days prior to use in this mode of operation.

CONTAINMENT SYSTEMS

STANDBY GAS TREATMENT SYSTEM

LIMITING CONDITION FOR OPERATION

3.6.5.3 Two independent standby gas treatment subsystems shall be OPERABLE.⁶

APPLICABILITY: OPERATIONAL CONDITIONS 1, 2, 3, and *.

ACTION:

- a. With one standby gas treatment subsystem inoperable, restore the inoperable subsystem to OPERABLE status within 7 days, or:
 1. In OPERABLE CONDITION 1, 2, or 3, be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.
 2. In Operational Condition*, suspend handling of irradiated fuel in the secondary containment, CORE ALTERATIONS and operations with a potential for draining the reactor vessel. The provisions of Specification 3.0.3 are not applicable.
- b. With both standby gas treatment subsystems inoperable in Operational Condition *, suspend handling of irradiated fuel in the secondary containment, CORE ALTERATIONS and operations with a potential for draining the reactor vessel. The provisions of Specification 3.0.3 are not applicable.

SURVEILLANCE REQUIREMENTS

4.6.5.3 Each standby gas treatment subsystem shall be demonstrated OPERABLE:

- a. At least once per 31 days by initiating, from the control room, flow through the HEPA filters and charcoal adsorbers and verifying that the subsystem operates for at least 10 hours with the heaters OPERABLE.

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

⁶The normal or emergency power source may be inoperable in Operational Condition *.

CONTAINMENT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

b. At least once per 18 months or (1) after any structural maintenance on the HEPA filter or charcoal adsorber housings, or (2) following painting, fire, or chemical release in any ventilation zone communicating with the subsystem by:

Insert 'A'

1. Verifying that the subsystem satisfies the in-place testing acceptance criteria and uses the test procedures of Regulatory Positions C.5.a, C.5.c and C.5.d of Regulatory Guide 1.52, Revision 2, March 1978, and the system flow rate is 4000 cfm \pm 10%.
2. Verifying within 31 days after removal that a laboratory analysis of a representative carbon sample obtained in accordance with Regulatory Position C.6.b of Regulatory Guide 1.52, Revision 2, March 1978, meets the laboratory testing criteria of Regulatory Position C.6.a of Regulatory Guide 1.52, Revision 2, March 1978.
3. Verifying a subsystem flow rate of 4000 cfm \pm 10% during system operation when tested in accordance with ANSI N510-1975.

c. After every 720 hours of charcoal adsorber operation by verifying within 31 days after removal that a laboratory analysis of a representative carbon sample obtained in accordance with Regulatory Position C.6.b of Regulatory Guide 1.52, Revision 2, March 1978, meets the laboratory testing criteria of Regulatory Position C.6.a of Regulatory Guide 1.52, Revision 2, March 1978.

d. At least once per 18 months by:

Insert 'B'

1. Verifying that the pressure drop across the combined HEPA filters and charcoal adsorber banks is less than or equal to 8 inches Water Gauge while operating the filter train at a flow rate of 4000 cfm \pm 10%.
2. Verifying that the filter train starts and isolation dampers open on each of the following test signals:
 - a. Reactor Building exhaust plenum radiation - high,
 - b. Drywell pressure - high,
 - c. Reactor vessel water level - low low, level 2, and
 - d. Fuel pool vent exhaust radiation - high.
3. Verifying that the heaters dissipate 23 ± 2.0 kw when tested in accordance with ANSI N510-1975. This reading shall include the appropriate correction for variations from 480 volts at the bus.

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INSERT A

Perform required standby gas treatment filter testing in accordance with, and at the frequency specified by, the Ventilation Filter Testing Program.

INSERT B

Deleted.

CONTAINMENT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

Insert C

e. After each complete or partial replacement of a HEPA filter bank by verifying that the HEPA filter banks remove greater than or equal to 99% of the DDP when they are tested in-place in accordance with ANSI N510-1975 while operating the system at a flow rate of 4000 cfm \pm 10%.

f. After each complete or partial replacement of a charcoal adsorber bank by verifying that the charcoal adsorbers remove greater than or equal to 99% of a halogenated hydrocarbon refrigerant test gas when they are tested in-place in accordance with ANSI N510-1975 while operating the system at a flow rate of 4000 cfm \pm 10%.

ATTACHMENT B
PROPOSED AMENDMENTS TO THE
LICENSE/TECHNICAL SPECIFICATIONS

INSERT C

Deleted.

PLANT SYSTEMS

3/4.7.2 CONTROL ROOM AND AUXILIARY ELECTRIC EQUIPMENT ROOM EMERGENCY FILTRATION SYSTEM

LIMITING CONDITION FOR OPERATION

3.7.2 Two independent control room and auxiliary electric equipment room emergency filtration system trains shall be OPERABLE.[#]

APPLICABILITY: All OPERATIONAL CONDITIONS and *.

ACTION:

- a. With one emergency filtration system train inoperable, restore the inoperable train to OPERABLE status within 7 days or:
 1. In OPERATIONAL CONDITIONS 1, 2, 3, be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.
 2. In OPERATIONAL CONDITION 4, 5 or *, initiate and maintain operation of the OPERABLE emergency filtration system in the pressurization mode of operation.
- b. With both emergency filtration system trains inoperable, in OPERATIONAL CONDITION 4, 5 or *, suspend CORE ALTERATIONS, handling of irradiated fuel in the secondary containment and operations with a potential for draining the reactor vessel.
- c. The provisions of Specification 3.0.3 are not applicable in Operational Condition *.

SURVEILLANCE REQUIREMENTS

4.7.2 Each control room and auxiliary electric equipment room emergency filtration system train shall be demonstrated OPERABLE:

- Insert 'D' →
- a. At least once per 31 days on a STAGGERED TEST BASIS by initiating, from the control room, flow through the HEPA filters and charcoal adsorbers and verifying that the train operates for at least 10 hours with the heaters OPERABLE.

*When irradiated fuel is being handled in the secondary containment.

[#]The normal or emergency power source may be inoperable in OPERATIONAL CONDITION 4, 5 or *.

**ATTACHMENT B
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LICENSE/TECHNICAL SPECIFICATIONS**

INSERT D

- a. "At least once per 31 days on a STAGGERED TEST BASIS:
1. By initiating, from the control room, flow through the HEPA filters and charcoal adsorbers and verifying that the train operates for at least 10 hours with the heaters OPERABLE, and
 2. Manually initiating flow through the control room and auxiliary electric equipment room recirculation filters for at least 10 hours.

PLANT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

b. At least once per 18 months^{##} or (1) after any structural maintenance on the HEPA filter or charcoal adsorber housings, or (2) following painting, fire or chemical release in any ventilation zone communicating with the train by:

1. Verifying that the train satisfies the in-place testing acceptance criteria and uses the test procedures of Regulatory Positions C.5.a, C.5.c and C.5.d of Regulatory Guide 1.52, Revision 2, March 1978, and the train flow rate is 4000 cfm \pm 10%.
2. Verifying within 31 days after removal that a laboratory analysis of a representative carbon sample obtained in accordance with Regulatory Position C.6.b of Regulatory Guide 1.52, Revision 2, March 1978, meets the laboratory testing criteria of Regulatory Position C.6.a of Regulatory Guide 1.52, Revision 2, March 1978.
3. Verifying a train flow rate of 4000 cfm \pm 10% during subsystem operation when tested in accordance with ANSI N510-1975.

Insert 'E'

c. After every 720^{**} hours of charcoal adsorber operation by verifying within 31 days after removal that a laboratory analysis of a representative carbon sample obtained in accordance with Regulatory Position C.6.b of Regulatory Guide 1.52, Revision 2, March 1978, meets the laboratory testing criteria of Regulatory Position C.6.a of Regulatory Guide 1.52, Revision 2, March 1978.

Insert 'F'

d. At least once per 18 months by:

1. Verifying that the pressure drop across the combined HEPA filters and charcoal adsorber banks is less than 8 inches Water Gauge while operating the train at a flow rate of 4000 cfm \pm 10%.

^{##}This surveillance shall include the recirculating charcoal filter, "odor eater," in the normal control room supply filter train using ANSI N510-1975 as a guide to verify \geq 70% efficiency in removing freon test gas.

^{**}Except that recirculating charcoal filter samples shall be removed and analyzed at least once per 18 months.

ATTACHMENT B
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INSERT E

Perform required control room and auxiliary electric equipment room filter testing in accordance with, and at the frequency specified by, the Ventilation Filter Testing Program.

INSERT F

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PLANT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

INSERT G

2. Verifying that on each of the below pressurization mode actuation test signals, the emergency train automatically switches to the pressurization mode of operation, and the control room is maintained at a positive pressure of 1/8 inch W.G. relative to the adjacent areas during emergency train operation at a flow rate less than or equal to 4000 cfm:
- a) Outside air smoke detection, and
 - b) Air intake radiation monitors.

greater than or equal to

3. Verifying that the heaters dissipate 20 ± 2.0 Kw when tested in accordance with ANSI N510-1975. This reading shall include the appropriate correction for variations from 480 volts at the bus.

Insert H

e. After each complete or partial replacement of a HEPA filter bank by verifying that the HEPA filter banks remove greater than or equal to 99% of the DOP when they are tested in-place in accordance with ANSI N510-1975 while operating the system at a flow rate of 4000 cfm $\pm 10\%$.

f. After each complete or partial replacement of a charcoal adsorber bank by verifying that the charcoal adsorbers remove 99% of a halogenated hydrocarbon refrigerant test gas when they are tested in-place in accordance with ANSI N510-1975 while operating the system at a flow rate of 4000 cfm $\pm 10\%$.

** This surveillance shall include the recirculating charcoal filter, "odor eater," in the normal control room supply filter train using ANSI N510-1975 as a guide to verify $\geq 70\%$ efficiency in removing freon test gas.

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INSERT G

Manually initiate flow through the control room and auxiliary electric equipment room recirculation filters line and then verify that the control room and auxiliary electric equipment rooms are

INSERT H

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CONTAINMENT SYSTEMS

BCSES

3/4.6.1 PRIMARY CONTAINMENT

3/4.6.1.4 DELETED

3/4.6.1.5 DELETED

3/4.6.1.6 DRYWELL AND SUPPRESSION CHAMBER INTERNAL PRESSURE

The limitation on drywell and suppression chamber internal pressure ensure that the containment peak pressure of 39.6 psig does not exceed the design pressure of 45 psig during LOCA conditions or that the external pressure differential does not exceed the design maximum external pressure differential of 5 psid. The limit of 2.0 psig for initial positive primary containment pressure will limit the total pressure to 39.6 psig which is less than the design pressure and is consistent with the accident analysis.

3/4.6.1.7 DRYWELL AVERAGE AIR TEMPERATURE

The limitation on drywell average air temperature ensures that the containment peak air temperature does not exceed the design temperature of 340°F during LOCA conditions and is consistent with the accident analysis.

3/4.6.1.8 DRYWELL AND SUPPRESSION CHAMBER PURGE SYSTEM

The drywell and suppression chamber purge supply and exhaust isolation valves are required to be closed during plant operation except as required for inerting, de-inerting and pressure control. These valves have been demonstrated capable of closing during a LOCA or steamline break accident from the full open position.

Insert 'I'

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INSERT I

During operations involving inerting, de-inerting and pressure control, only the drywell or suppression chamber purge supply and exhaust isolation valves may be open to prevent the creation of a bypass path between the drywell and suppression chamber. Creation of a bypass path between the drywell and the suppression chamber air space through the vent and purge lines would allow steam and gases from a LOCA to bypass the downcomers to the suppression pool in excess of design bypass leakage.

3/4.7 PLANT SYSTEMS

BASES

3/4.7.1 CORE STANDBY COOLING SYSTEM - EQUIPMENT COOLING WATER SYSTEMS

The OPERABILITY of the core standby cooling system - equipment cooling water systems and the ultimate heat sink ensure that sufficient cooling capacity is available for continued operation of safety-related equipment during normal and accident conditions. The redundant cooling capacity of these systems, assuming a single failure, is consistent with the assumptions used in the accident conditions within acceptable limits.

3/4.7.2 CONTROL ROOM AND AUXILIARY ELECTRIC EQUIPMENT ROOM EMERGENCY FILTRATION SYSTEM

Insert 'J'

The OPERABILITY of the control room and auxiliary electric equipment room emergency filtration system ensures that the rooms will remain habitable for operations personnel during and following all design basis accident conditions. The OPERABILITY of this system in conjunction with room design provisions is based on limiting the radiation exposure to personnel occupying the rooms to 5 rem or less whole body, or its equivalent. This limitation is consistent with the requirements of General Design Criteria 19 of Appendix "A", 10 CFR Part 50. Cumulative operation of the system with the heaters OPERABLE for 10 hours over a 31 day period is sufficient to reduce the buildup of moisture on the adsorbers and HEPA filters.

3/4.7.3 REACTOR CORE ISOLATION COOLING SYSTEM

The reactor core isolation cooling (RCIC) system is provided to assure adequate core cooling in the event of reactor isolation from its primary heat sink and the loss of feedwater flow to the reactor vessel without requiring actuation of any of the Emergency Core Cooling System equipment. The RCIC system is conservatively required to be OPERABLE whenever reactor pressure exceeds 150 psig even though the LPCI mode of the the residual heat removal (RHR) system provides adequate core cooling up to 350 psig.

The RCIC system specifications are applicable during OPERATIONAL CONDITIONS 1, 2 and 3 when reactor vessel pressure exceeds 150 psig because RCIC is the primary non-ECCS source of core cooling when the reactor is pressurized.

With the RCIC system inoperable, adequate core cooling is assured by the OPERABILITY of the HPCS system and justifies the specified 14 day out-of-service period.

The surveillance requirements provide adequate assurance that RCICS will be OPERABLE when required. Although all active components are testable and full flow can be demonstrated by recirculation during reactor operation, a complete functional test requires reactor shutdown. Initial startup test program data may be used to determine equivalent turbine/pump capabilities between test flow path and the vessel injection flow path. The pump discharge piping is maintained full to prevent water hammer damage and to start cooling at the earliest possible moment. The low pressure setpoint allowable value for the discharge line "keep-filled" alarm is based on the head of water between the centerline of the pump discharge and the system high point vent.

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INSERT J

, which includes the control room and auxiliary electric equipment room recirculation filters,

ADMINISTRATIVE CONTROLS

PLANT OPERATING PROCEDURES AND PROGRAMS (Continued)

6.2.F. Primary Containment Leakage Rate Testing Program

A program shall be established to implement the leakage rate testing of the primary containment as required by 10 CFR 50.54(o) and 10 CFR 50, Appendix J, Option B, as modified by approved exemptions. This program shall be in accordance with the guidelines contained in Regulatory Guide 1.163, "Performance-Based Containment Leak-Testing Program," dated September 1995.

The peak calculated primary containment internal pressure for the design basis loss of coolant accident, P_0 , is 39.6 psig.

The maximum allowable primary containment leakage rate, L_0 , at P_0 , is 0.635% of primary containment air weight per day.

Leakage rate acceptance criteria are:

- a. Primary containment overall leakage rate acceptance criterion is $\leq 1.0 L_0$. During the first unit startup following testing in accordance with this program, the leakage rate acceptance criteria are $\leq 0.60 L_0$ for the combined Type B and Type C tests, and $\leq 0.75 L_0$ for Type A tests.
- b. Air lock testing acceptance criteria are:
 - 1) Overall air lock leakage rate is $\leq 0.05 L_0$ when tested at $\geq P_0$.
 - 2) For each door, the seal leakage rate is ≤ 5 scf per hour when the gap between the door seals is pressurized to ≥ 10 psig.

The provisions of specification 4.0.2 do not apply to the test frequencies specified in the Primary Containment Leakage Rate Testing Program.

The provisions of specification 4.0.3 are applicable to the Primary Containment Leakage Rate Testing Program.

6.3 ACTION TO BE TAKEN IN THE EVENT OF A REPORTABLE EVENT IN PLANT OPERATION

The following actions shall be taken for REPORTABLE EVENTS:

- a. The Commission shall be notified and a Licensee Event Report submitted pursuant to the requirements of Section 50.73 to 10 CFR Part 50, and
- b. Each REPORTABLE EVENT shall be reviewed by the Onsite Review and Investigative Function.

Insert 'k'

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INSERT K

8. Ventilation Filter Testing Program (VFTP)

A program shall be established to implement the following required testing of Engineered Safety Feature (ESF) filter ventilation systems at the frequencies specified in Regulatory Guide 1.52, Revision 2, dated March 1978, and conducted in general conformance with ASME N510-1989.

The provisions of Specifications 4.0.2 and 4.0.3 are applicable to the VFTP test frequencies.

- a. Demonstrate for each of the ESF systems that an inplace test of the high efficiency particulate air (HEPA) filters shows a penetration and system bypass $< 0.05\%$ when tested in general conformance with Regulatory Guide 1.52, Revision 2, and ASME N510-1989, at the system flowrate specified below:

ESF Ventilation System	Flowrate (cfm)
SBGT System	≥ 3600 and ≤ 4400
CREF System	≥ 3600 and ≤ 4400

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INSERT K (Continued)

- b. Demonstrate for each of the ESF system filter units that an in-place test of the charcoal adsorber shows a penetration and system bypass less than the value specified below, when tested in general conformance with Regulatory Guide 1.52, Revision 2, and ASME N510-1989, at the system flowrate specified below:

ESF Ventilation System	Penetration and System Bypass	Flowrate (cfm)
SBGT System	0.05 %	≥ 3600 and ≤ 4400
CREF System	0.05 %	≥ 3600 and ≤ 4400
CRRF System	2.0 %	≥ 18000 and ≤ 28900
AEERRF System	2.0 %	≥ 14000 and ≤ 19900

- c. Demonstrate for each of the ESF systems that a laboratory test of a sample of the charcoal adsorber, when obtained as described in Regulatory Guide 1.52, Revision 2, shows the methyl iodide penetration less than the value specified below when tested at a temperature of 30°C, a relative humidity of 70 % and a face velocity as specified below in general conformance with ASME D3803-1989.

ESF Ventilation System	Penetration	Face Velocity (fpm)
SBGT System	0.5 %	40
CREF System	2.5 %	40
CRRF System	15.0 %	80
AEERRF System	15.0 %	80

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INSERT K (Continued)

- d. Demonstrate for each of the ESF systems that the pressure drop across the combined moisture separator, heater, prefilter, HEPA filters and the charcoal adsorbers is less than the value specified below when tested at the system flowrate specified below:

ESF Ventilation System	Delta P (inches wg)	Flowrate (cfm)
SBGT System	8	≥ 3600 and ≤ 4400
CREF System	8	≥ 3600 and ≤ 4400

- e. Demonstrate that the heaters for each of the ESF systems dissipate the electrical power specified below when tested in general conformance with ASME N510-1989. These readings shall include appropriate corrections for variations from 480 Volts at the bus.

ESF Ventilation System	Wattage (kw)
SBGT System	≥ 21 and ≤ 25
CREF System	≥ 18 and ≤ 22

CONTAINMENT SYSTEMS

DRYWELL AND SUPPRESSION CHAMBER PURGE SYSTEM

LIMITING CONDITION FOR OPERATION

3.6.1.8 The drywell and suppression chamber purge system may be in operation with the drywell and/or suppression chamber purge supply and exhaust butterfly isolation valves open for inerting, deinerting, and pressure control. Purging through the Standby Gas Treatment System shall be restricted to less than or equal to 90 hours per 365 days. S

APPLICABILITY: OPERATIONAL CONDITIONS 1, 2, and 3.

ACTION: (dry)

With a drywell and/or suppression chamber purge supply and/or exhaust butterfly isolation valve open for other than inerting, deinerting, or pressure control, close the butterfly valve(s) within 1 hour or be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours. S

SURVEILLANCE REQUIREMENTS

4.6.1.8.1 The cumulative time that the drywell and suppression chamber purge system has been in operation purging through the Standby Gas Treatment System shall be verified to be less than or equal to 90 hours per 365 days prior to use in this mode of operation. S-

CONTAINMENT SYSTEMS

STANDBY GAS TREATMENT SYSTEM

LIMITING CONDITION FOR OPERATION

3.6.5.3 Two independent standby gas treatment subsystems shall be OPERABLE.†

APPLICABILITY: OPERATIONAL CONDITIONS 1, 2, 3, and *.

ACTION:

- a. With one standby gas treatment subsystem inoperable, restore the inoperable subsystem to OPERABLE status within 7 days, or:
 1. In OPERABLE CONDITION 1, 2, or 3, be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.
 2. In OPERATIONAL CONDITION *, suspend handling of irradiated fuel in the secondary containment, CORE ALTERATIONS and operations with a potential for draining the reactor vessel. The provisions of Specification 3.0.3 are not applicable.
- b. With both standby gas treatment subsystems inoperable in OPERATIONAL CONDITION *, suspend handling of irradiated fuel in the secondary containment, CORE ALTERATIONS and operations with a potential for draining the reactor vessel. The provisions of Specification 3.0.3 are not applicable.

SURVEILLANCE REQUIREMENTS

4.6.5.3 Each standby gas treatment subsystem shall be demonstrated OPERABLE:

- a. At least once per 31 days by initiating, from the control room, flow through the HEPA filters and charcoal adsorbers and verifying that the subsystem operates for at least 10 hours with the heaters OPERABLE.

†,‡

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

†The normal or emergency power source may be inoperable in OPERATIONAL CONDITION *.

CONTAINMENT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

b. At least once per 18 months or (1) after any structural maintenance on the HEPA filter or charcoal adsorber housings, or (2) following painting, fire, or chemical release in any ventilation zone communicating with the subsystem by:

1. Verifying that the subsystem satisfies the in-place testing acceptance criteria and uses the test procedures of Regulatory Positions C.5.a, C.5.c and C.5.d of Regulatory Guide 1.52, Revision 2, March 1978, and the system flow rate is $4000 \text{ cfm} \pm 10\%$.
2. Verifying within 31 days after removal that a laboratory analysis of a representative carbon sample obtained in accordance with Regulatory Position C.6.b of Regulatory Guide 1.52, Revision 2, March 1978, meets the laboratory testing criteria of Regulatory Position C.6.a of Regulatory Guide 1.52, Revision 2, March 1978.
3. Verifying a subsystem flow rate of $4000 \text{ cfm} \pm 10\%$ during system operation when tested in accordance with ANSI N510-1975.

c. After every 720 hours of charcoal adsorber operation by verifying within 31 days after removal that a laboratory analysis of a representative carbon sample obtained in accordance with Regulatory Position C.6.b of Regulatory Guide 1.52, Revision 2, March 1978, meets the laboratory testing criteria of Regulatory Position C.6.a of Regulatory Guide 1.52, Revision 2, March 1978.

d. At least once per 18 months by:

1. Verifying that the pressure drop across the combined HEPA filters and charcoal adsorber banks is less than or equal to 8 inches water gauge while operating the filter train at a flow rate of $4000 \text{ cfm} \pm 10\%$.
2. Verifying that the filter train starts and isolation dampers open on each of the following test signals:
 - a. Reactor Building exhaust plenum radiation - high,
 - b. Drywell pressure - high,
 - c. Reactor vessel water level - low low, level 2, and
 - d. Fuel pool vent exhaust radiation - high.
3. Verifying that the heaters dissipate $23 \pm 2.0 \text{ kW}$ when tested in accordance with ANSI N510-1975. This reading shall include the appropriate correction for variations from 480 volts at the bus.

Insert 'A'

Insert 'B'

ATTACHMENT B
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INSERT A

Perform required standby gas treatment filter testing in accordance with, and at the frequency specified by, the Ventilation Filter Testing Program.

INSERT B

Deleted.

CONTAINMENT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

Insert 'c'

e.
After each complete or partial replacement of a HEPA filter bank by verifying that the HEPA filter banks remove greater than or equal to 99% of the DOP when they are tested in-place in accordance with ANSI NS10-1975 while operating the system at a flow rate of 4000 cfm \pm 10%.

f.
After each complete or partial replacement of a charcoal adsorber bank by verifying that the charcoal adsorbers remove greater than or equal to 99% of a halogenated hydrocarbon refrigerant test gas when they are tested in-place in accordance with ANSI NS10-1975 while operating the system at a flow rate of 4000 cfm \pm 10%.

and
oct

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INSERT C

Deleted.

PLANT SYSTEMS

3/4.7.2 CONTROL ROOM AND AUXILIARY ELECTRIC EQUIPMENT ROOM EMERGENCY
FILTRATION SYSTEM

LIMITING CONDITION FOR OPERATION

3.7.2 Two independent control room and auxiliary electric equipment room emergency filtration system trains shall be OPERABLE.⁶

APPLICABILITY: All OPERATIONAL CONDITIONS and ".

ACTION:

- a. With one emergency filtration system train inoperable, restore the inoperable train to OPERABLE status within 7 days or:
 1. In OPERATIONAL CONDITIONS 1, 2, 3, be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.
 2. In OPERATIONAL CONDITION 4, 5 or "., initiate and maintain operation of the OPERABLE emergency filtration system in the pressurization mode of operation.
- b. With both emergency filtration system trains inoperable, in OPERATIONAL CONDITION 4, 5 or "., suspend CORE ALTERATIONS, handling of irradiated fuel in the secondary containment and operations with a potential for draining the reactor vessel⁷
- c. The provisions of Specification 3.0.3 are not applicable in Operational Condition ".

SURVEILLANCE REQUIREMENTS

4.7.2 Each control room and auxiliary electric equipment room emergency filtration system train shall be demonstrated OPERABLE:

- Insert 'D'
- a. At least once per 31 days on a STAGGERED TEST BASIS by initiating, from the control room, flow through the HEPA filters and charcoal adsorbers and verifying that the train operates for at least 10 hours with the heaters OPERABLE.

⁷When irradiated fuel is being handled in the secondary containment.

⁶The normal or emergency power source may be inoperable in OPERATIONAL CONDITION 4, 5 or ".

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INSERT D

- a. "At least once per 31 days on a STAGGERED TEST BASIS:
1. By initiating, from the control room, flow through the HEPA filters and charcoal adsorbers and verifying that the train operates for at least 10 hours with the heaters OPERABLE, and
 2. Manually initiating flow through the control room and auxiliary electric equipment room recirculation filters for at least 10 hours.

PLANT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

b. At least once per 18 months⁹⁹ or (1) after any structural maintenance on the HEPA filter or charcoal adsorber housings, or (2) following painting, fire or chemical release in any ventilation zone communicating with the train by:

1. Verifying that the train satisfies the in-place testing acceptance criteria and uses the test procedures of Regulatory Positions C.5.a, C.5.c and C.5.d of Regulatory Guide 1.52, Revision 2, March 1978, and the train flow rate is 4000 cfm \pm 10%.
2. Verifying within 31 days after removal that a laboratory analysis of a representative carbon sample obtained in accordance with Regulatory Position C.6.b of Regulatory Guide 1.52, Revision 2, March 1978, meets the laboratory testing criteria of Regulatory Position C.6.a of Regulatory Guide 1.52, Revision 2, March 1978.
3. Verifying a train flow rate of 4000 cfm \pm 10% during subsystem operation when tested in accordance with ANSI NS10-1975.

Insert 'E'

c. After every 720¹⁰⁰ hours of charcoal adsorber operation by verifying within 31 days after removal that a laboratory analysis of a representative carbon sample obtained in accordance with Regulatory Position C.6.b of Regulatory Guide 1.52, Revision 2, March 1978, meets the laboratory testing criteria of Regulatory Position C.6.a of Regulatory Guide 1.52, Revision 2, March 1978.

Insert 'F'

d. At least once per 18 months by:

1. Verifying that the pressure drop across the combined HEPA filters and charcoal adsorber banks is less than 8 inches Water Gauge while operating the train at a flow rate of 4000 cfm \pm 10%.

⁹⁹This surveillance shall include the recirculating charcoal filter, "odor eater," in the normal control room supply filter train using ANSI NS10-1975 as a guide to verify \geq 70% efficiency in removing freon test gas.

¹⁰⁰Except that recirculating charcoal filter samples shall be removed and analyzed at least once per 18 months.

ATTACHMENT B
PROPOSED AMENDMENTS TO THE
LICENSE/TECHNICAL SPECIFICATIONS

INSERT E

Perform required control room and auxiliary electric equipment room filter testing in accordance with, and at the frequency specified by, the Ventilation Filter Testing Program.

INSERT F

Deleted.

PLANT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

Insert 'G'

2. Verifying that on each of the below pressurization mode actuation test signals, the emergency train automatically switches to the pressurization mode of operation, and the control room is maintained at a positive pressure of $\frac{1}{8}$ inch W.G. relative to the adjacent areas during emergency train operation at a flow rate less than or equal to 4000 cfm:

greater than or equal to

- a) Outside air smoke detection, and
- b) Air intake radiation monitors.

3. Verifying that the heaters dissipate 20 ± 2.0 Kw when tested in accordance with ANSI N510-1975. This reading shall include the appropriate correction for variations from 480 volts at the bus.

Insert 'H'

e. After each complete or partial replacement of a HEPA filter bank by verifying that the HEPA filter banks remove greater than or equal to 99% of the DOP when they are tested in-place in accordance with ANSI N510-1975 while operating the system at a flow rate of 4000 cfm $\pm 10\%$.

f. After each complete or partial replacement of a charcoal adsorber bank^{dd} by verifying that the charcoal adsorbers remove 99% of a halogenated hydrocarbon refrigerant test gas when they are tested in-place in accordance with ANSI N510-1975 while operating the system at a flow rate of 4000 cfm $\pm 10\%$.

^{dd} This surveillance shall include the recirculating charcoal filter, "odor eater," in the normal control room supply filter train using ANSI N510-1975 as a guide to verify $\geq 70\%$ efficiency in removing freon test gas.

Surveillance
Requirements
Spec

ATTACHMENT B
PROPOSED AMENDMENTS TO THE
LICENSE/TECHNICAL SPECIFICATIONS

INSERT C

Manually initiate flow through the control room and auxiliary electric equipment room recirculation filters and then verify that the control room and auxiliary electric equipment rooms are

INSERT H

Deleted.

CONTAINMENT SYSTEMS

BASES

3/4.6.1 PRIMARY CONTAINMENT

3/4.6.1.5 DELETED

3/4.6.1.6 DRYWELL AND SUPPRESSION CHAMBER INTERNAL PRESSURE

The limitation on drywell and suppression chamber internal pressure ensure that the containment peak pressure of 39.6 psig does not exceed the design pressure of 45 psig during LOCA conditions or that the external pressure differential does not exceed the design maximum external pressure differential of 5 psid. The limit of 2.0 psig for initial positive primary containment pressure will limit the total pressure to 39.6 psig which is less than the design pressure and is consistent with the accident analysis.

3/4.6.1.7 DRYWELL AVERAGE AIR TEMPERATURE

The limitation on drywell average air temperature ensures that the containment peak air temperature does not exceed the design temperature of 340°F during LOCA conditions and is consistent with the accident analysis.

3/4.6.1.8 DRYWELL AND SUPPRESSION CHAMBER PURGE SYSTEM

The drywell and suppression chamber purge supply and exhaust isolation valves are required to be closed during plant operation except as required for inerting, de-inerting and pressure control. These valves have been demonstrated capable of closing during a LOCA or steamline break accident from the full open position.

Insert 'I'

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

INSERT I

During operations involving inerting, de-inerting and pressure control, only the drywell or suppression chamber purge supply and exhaust isolation valves may be open to prevent the creation of a bypass path between the drywell and suppression chamber. Creation of a bypass path between the drywell and the suppression chamber air space through the vent and purge lines would allow steam and gases from a LOCA to bypass the downcomers to the suppression pool in excess of design bypass leakage.

3/4.7 PLANT SYSTEMS

BASES

3/4.7.1 CORE STANDBY COOLING SYSTEM - EQUIPMENT COOLING WATER SYSTEMS

The OPERABILITY of the core standby cooling system - equipment cooling water systems and the ultimate heat sink ensure that sufficient cooling capacity is available for continued operation of safety-related equipment during normal and accident conditions. The redundant cooling capacity of these systems, assuming a single failure, is consistent with the assumptions used in the accident conditions within acceptable limits.

3/4.7.2 CONTROL ROOM AND AUXILIARY ELECTRIC EQUIPMENT ROOM EMERGENCY FILTRATION SYSTEM

The OPERABILITY of the control room and auxiliary electric equipment room emergency filtration system ensures that the rooms will remain habitable for operations personnel during and following all design basis accident conditions. The OPERABILITY of this system in conjunction with room design provisions is based on limiting the radiation exposure to personnel occupying the rooms to 5 rem or less whole body, or its equivalent. This limitation is consistent with the requirements of General Design Criteria 19 of Appendix "A", 10 CFR Part 50. Cumulative operation of the system with the heaters OPERABLE for 10 hours over a 31 day period is sufficient to reduce the buildup of moisture on the adsorbers and HEPA filters.

INSERT J

3/4.7.3 REACTOR CORE ISOLATION COOLING SYSTEM

The reactor core isolation cooling (RCIC) system is provided to assure adequate core cooling in the event of reactor isolation from its primary heat sink and the loss of feedwater flow to the reactor vessel without requiring actuation of any of the Emergency Core Cooling System equipment. The RCIC system is conservatively required to be OPERABLE whenever reactor pressure exceeds 150 psig even though the LPCI mode of the residual heat removal (RHR) system provides adequate core cooling up to 350 psig.

The RCIC system specifications are applicable during OPERATIONAL CONDITIONS 1, 2 and 3 when reactor vessel pressure exceeds 150 psig because RCIC is the primary non-ECCS source of core cooling when the reactor is pressurized.

With the RCIC system inoperable, adequate core cooling is assured by the OPERABILITY of the HPCS system and justifies the specified 14 day out-of-service period.

The surveillance requirements provide adequate assurance that RCICS will be OPERABLE when required. Although all active components are testable and full flow can be demonstrated by recirculation during reactor operation, a complete functional test requires reactor shutdown. Initial startup test program data may be used to determine equivalent turbine/pump capabilities between test flow path and the vessel injection flow path. The pump discharge piping is maintained full to prevent water hammer damage and to start cooling at the earliest possible moment. The low pressure setpoint allowable value for the discharge line "keep-filled" alarm is based on the head of water between the centerline of the pump discharge and the system high point vent.

\$

ATTACHMENT B
PROPOSED AMENDMENTS TO THE
LICENSE/TECHNICAL SPECIFICATIONS

INSERT J

, which includes the control room and auxiliary electric equipment room
recirculation filters,

ADMINISTRATIVE CONTROLS

PLANT OPERATING PROCEDURES AND PROGRAMS (Continued)

the Initial Structural Integrity Tests were not within 2 years of each other.

The Onsite Review and Investigative Function shall be responsible for reviewing and approving changes to the Inservice Inspection Program for Post Tensioning Tendons.

The provisions of 4.0.2 and 4.0.3 are applicable to the Tendon Surveillance Program inspection frequencies.

6.2.F. Primary Containment Leakage Rate Testing Program

A program shall be established to implement the leakage rate testing of the primary containment as required by 10 CFR 50.54(o) and 10 CFR 50 Appendix J, Option B, as modified by approved exemptions. This program shall be in accordance with the guidelines contained in Regulatory Guide 1.163, "Performance-Based Containment Leak-Testing Program," dated September 1995.

The peak calculated primary containment internal pressure for the design basis loss of coolant accident, P_a , is 39.6 psig.

The maximum allowable primary containment leakage rate, L_a , at P_a , is 0.635% of primary containment air weight per day.

Leakage rate acceptance criteria are:

- a. Primary containment overall leakage rate acceptance criterion is $\leq 1.0 L_a$. During the first unit startup following testing in accordance with this program, the leakage rate acceptance criteria are $\leq 0.60 L_a$ for the combined Type B and Type C tests, and $\leq 0.75 L_a$ for Type A tests.
- b. Air lock testing acceptance criteria are:
 - 1) Overall air lock leakage rate is $\leq 0.05 L_a$ when tested at $\geq P_a$.
 - 2) For each door, the seal leakage rate is ≤ 5 scf per hour when the gap between the door seals is pressurized to ≥ 10 psig.

The provisions of specification 4.0.2 do not apply to the test frequencies specified in the Primary Containment Leakage Rate Testing Program.

The provisions of specification 4.0.3 are applicable to the Primary Containment Leakage Rate Testing Program.

6.3 ACTION TO BE TAKEN IN THE EVENT OF A REPORTABLE EVENT IN PLANT OPERATION

The following actions shall be taken for REPORTABLE EVENTS:

- a. The Commission shall be notified and a Licensee Event Report submitted pursuant to the requirements of Section 50.73 to 10 CFR Part 50, and
- b. Each REPORTABLE EVENT shall be reviewed pursuant to Specification 6.1.G.2.c(i).

INSERT 'K'

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

INSERT K

8. Ventilation Filter Testing Program (VFTP)

A program shall be established to implement the following required testing of Engineered Safety Feature (ESF) filter ventilation systems at the frequencies specified in Regulatory Guide 1.52, Revision 2, dated March 1978, and conducted in general conformance with ASME N510-1989.

The provisions of Specifications 4.0.2 and 4.0.3 are applicable to the VFTP test frequencies.

- a. Demonstrate for each of the ESF systems that an in-place test of the high efficiency particulate air (HEPA) filters shows a penetration and system bypass $< 0.05\%$ when tested in general conformance with Regulatory Guide 1.52, Revision 2, and ASME N510-1989, at the system flowrate specified below:

ESF Ventilation System	Flowrate (cfm)
SBGT System	≥ 3600 and ≤ 4400
CREF System	≥ 3600 and ≤ 4400

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

INSERT K (Continued)

- b. Demonstrate for each of the ESF system filter units that an inplace test of the charcoal adsorber shows a penetration and system bypass less than the value specified below, when tested in general conformance with Regulatory Guide 1.52, Revision 2, and ASME N510-1989, at the system flowrate specified below:

ESF Ventilation System	Penetration and System Bypass	Flowrate (cfm)
SBGT System	0.05 %	≥ 3600 and ≤ 4400
CREF System	0.05 %	≥ 3600 and ≤ 4400
CRRF System	2.0 %	≥ 18000 and ≤ 28900
AEERRF System	2.0 %	≥ 14000 and ≤ 19900

- c. Demonstrate for each of the ESF systems that a laboratory test of a sample of the charcoal adsorber, when obtained as described in Regulatory Guide 1.52, Revision 2, shows the methyl iodide penetration less than the value specified below when tested at a temperature of 30°C, a relative humidity of 70 % and a face velocity as specified below in general conformance with ASME D3803-1989.

ESF Ventilation System	Penetration	Face Velocity (fpm)
SBGT System	0.5 %	40
CREF System	2.5 %	40
CRRF System	15.0 %	80
AEERRF System	15.0 %	80

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

INSERT K (Continued)

- d. Demonstrate for each of the ESF systems that the pressure drop across the combined moisture separator, heater, prefilter, HEPA filters and the charcoal adsorbers is less than the value specified below when tested at the system flowrate specified below:

ESF Ventilation System	Delta P (inches wg)	Flowrate (cfm)
SBGT System	8	≥ 3600 and ≤ 4400
CREF System	8	≥ 3600 and ≤ 4400

- e. Demonstrate that the heaters for each of the ESF systems dissipate the electrical power specified below when tested in general conformance with ASME N510-1989. These readings shall include appropriate corrections for variations from 480 Volts at the bus.

ESF Ventilation System	Wattage (kw)
SBGT System	≥ 21 and ≤ 25
CREF System	≥ 18 and ≤ 22

ATTACHMENT C

**LASALLE COUNTY NUCLEAR POWER STATION
UNITS 1 AND 2**

**EVALUATION OF SIGNIFICANT HAZARD CONSIDERATIONS
FOR PROPOSED CHANGES TO**

**FACILITY OPERATING LICENSES
NPF-11 AND NPF-18**

APPENDIX A TECHNICAL SPECIFICATIONS

VENTILATION FILTER TESTING PROGRAM

ATTACHMENT C
SIGNIFICANT HAZARDS CONSIDERATION

Summary of the Proposed Technical Specification Changes:

Commonwealth Edison Company (ComEd) proposes to make the following revisions to the LaSalle County Nuclear Power Station (LaSalle), Units 1 and 2, Technical Specifications (TSs):

1. Drywell and Suppression Chamber Purge System

TS 3.6.1.8 and associated Bases will be revised to prohibit the simultaneous opening of the drywell and suppression chamber purge system isolation valves;

2. Ventilation Filter Testing Program

The requirements of Standby Gas Treatment System (SBGTS) Technical Specification Surveillance Requirements (TS SRs) 4.6.5.3.b, 4.6.5.3.c, 4.6.5.3.d.1, 4.6.5.3.d.3, 4.6.5.3.e, and 4.6.5.3.f will be relocated to TS 6.2.F.8, Ventilation Filter Testing Program,

The requirements of TS SRs 4.7.2.b, 4.7.2.c, 4.7.2.d.1, 4.7.2.d.3, 4.7.2.e, 4.7.2.f, and associated footnotes will be relocated to TS 6.2.F.8, Ventilation Filter Testing Program, and

TS 6.2.F.8 will be added to describe the Ventilation Filter Testing Program;

3. Other Control Room and Auxiliary Electric Equipment Room
Emergency Filtration System Changes

TS SR 4.7.2.a will be revised to require flow through the control room and AEER recirculation filters;

TS SR 4.7.2.d.2 will be revised to require the control room and AEER recirculation filters to be online while the surveillance is being performed and that both the control room and AEERs are to be maintained at a positive pressure;

ATTACHMENT C
SIGNIFICANT HAZARDS CONSIDERATION

TS 3.7.2 Bases will be revised to specifically identify the control room and AEER recirculation filters being required for system operability;

and

4. Editorial Changes

TS 6.2.F.7 will be reformatted to be consistent with the remainder of TS 6.2.F. No technical changes will be made.

ComEd has evaluated the proposed TS amendment and determined that it does not represent a significant hazards consideration. Based on the criteria for defining a significant hazards consideration established in Title 10, Code of Federal Regulations, Part 50, Section 92 (10 CFR 50.92), operation of LaSalle, 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:
 - a. Drywell and Suppression Chamber Purge System

The purpose of the drywell and suppression chamber purge system isolation valves is to mitigate the consequences of a design bases accident. Operation of these valves will have no effect on the probability of a design bases accident occurring.

The current TS 3.6.1.8 allows for the drywell and suppression chamber purge system isolation valves to be open simultaneously. In this condition, containment pressure and offsite dose during design bases accidents would be greater than previously evaluated. The proposed revision to TS 3.6.1.8 would prevent the simultaneous opening of the drywell and suppression chamber purge system isolation valves thus assuring that the consequences of design bases accidents previously evaluated are still bounding.

ATTACHMENT C
SIGNIFICANT HAZARDS CONSIDERATION

b. Ventilation Filter Testing Program

The SBGTS and Control Room and AEER Emergency Filtration System are designed to mitigate the radiological consequences of previously evaluated design bases accidents. Operation and testing of these systems will have no effect on the probability of a design bases accident occurring.

The proposed revisions associated with this change relocate the requirements for SBGTS and Control Room and AEER Emergency Filtration System filter testing from the current TS SRs to a new TS administrative control program. The testing requirements are being upgraded to the latest industry standards. Filter testing in accordance with the proposed program will ensure that Title 10, Code of Federal Regulations, Part 50 (10 CFR 50), Appendix A, General Design Criteria (GDC) 19 and 10 CFR 100 limits are not exceeded.

c. Other Control Room and Auxiliary Electric Equipment Room Emergency Filtration System Changes

The SBGTS and Control Room and AEER Emergency Filtration System are designed to mitigate the radiological consequences of previously evaluated design bases accidents. Operation and testing of these systems will have no effect on the probability of a design bases accident occurring.

The proposed revisions associated with this change acknowledge that the AEERs are required to be habitable during design bases accidents. This is consistent with the plant's design bases.

ATTACHMENT C
SIGNIFICANT HAZARDS CONSIDERATION

d. Editorial Changes

The proposed revisions to TS 6.2.F.7 reformat the requirement to establish consistency with the remainder of TS 6.2.F. There are no technical changes being proposed.

Based upon the above, the proposed amendment will not increase the probability or consequences of any accident previously evaluated

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

a. Drywell and Suppression Chamber Purge System

No new plant equipment is being installed, and use of currently installed plant equipment is not affected by this proposed change. The proposed revision to TS 3.6.1.8 provides additional limitations on the opening of the drywell and suppression chamber purge system isolation valves.

b. Ventilation Filter Testing Program

No new plant equipment is being installed, and use of currently installed plant equipment is not affected by this proposed change. These proposed revisions will demonstrate operability of the Control Room and AEER Emergency Filtration System using the latest industry standards.

c. Other Control Room and Auxiliary Electric Equipment Room Emergency Filtration System Changes

No new plant equipment is being installed, and use of currently installed plant equipment is not affected by this proposed change. These proposed revisions will demonstrate habitability of the AEER by imposing operability requirements on the AEER recirculation filter units.

ATTACHMENT C
SIGNIFICANT HAZARDS CONSIDERATION

d. Editorial Changes

The proposed revisions to TS 6.2.F.7 reformat the requirement to establish consistency with the remainder of TS 6.2.F. There are no technical changes being proposed.

Based upon the above, the proposed change will not create the possibility of a new or different kind of accident or transient previously evaluated.

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

a. Drywell and Suppression Chamber Purge System

The current TS 3.6.1.8 requirements are non-conservative with respect to the assumptions used when evaluating steam bypass of the suppression chamber; specifically, a maximum allowable leakage area of 0.03 square feet with the only credible leakage path was assumed to be suppression chamber vacuum breaker valve seat leakage. This proposed revision to TS 3.6.1.8 will make the TS requirements consistent with those assumptions.

b. Ventilation Filter Testing Program

These proposed revisions will ensure operability of the Control Room and Auxiliary Electric Equipment Room (AEER) Emergency Filtration System using the latest industry standards. Filter testing in accordance with the proposed program will ensure that GDC 19 and 10 CFR 100 limits are not exceeded.

ATTACHMENT C
SIGNIFICANT HAZARDS CONSIDERATION

c. Other Control Room and Auxiliary Electric Equipment Room
Emergency Filtration System Changes

These proposed revisions will ensure operability of the control room and AEER Emergency Filtration System by demonstrating system performance with the control room and AEER recirculation filter units to ensure GDC 19 limits are not exceeded.

d. Editorial Changes

The proposed revisions to TS 6.2.F.7 reformat the requirement to establish consistency with the remainder of TS 6.2.F. There are no technical changes being proposed.

Based on the above, the proposed TS change does 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

**LASALLE COUNTY NUCLEAR POWER STATION
UNITS 1 AND 2**

**ENVIRONMENTAL ASSESSMENT STATEMENT
FOR PROPOSED CHANGES TO**

**FACILITY OPERATING LICENSES
NPF-11 AND NPF-18**

APPENDIX A TECHNICAL SPECIFICATIONS

VENTILATION FILTER TESTING PROGRAM

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.