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ComEd

April 25, 2000

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

LaSalle County Station, Units 1 and 2
Facility Operating License Nos. NPF-11 and NPF-18
NRC Docket Nos. 50-373 and 50-374

Subject: Application for Amendment to Appendix A, Technical Specifications, Section 3/4.9.5, "Communications"

In accordance with 10 CFR 50.90, "Application for amendment of license or construction permit," Commonwealth Edison (ComEd) Company proposes changes to Appendix A, Technical Specifications (TS), of Facility Operating License Nos. NPF-11 and NPF-18. Specifically, we propose to change TS Section 3/4.9.5, "Communications."

TS Section 3/4.9.5 requires that direct communications be maintained between the control room and the refueling platform personnel during Core Alterations in Operational Condition 5, "Refueling." The proposed changes, for Units 1 and 2, to TS Section 3/4.9.5, will reinsert part of a footnote that was deleted in Amendment No. 136 to Facility Operation License No. NPF-11 and Amendment No. 121 to Facility Operation License No. NPF-18. The footnote will allow the movement of a control rod in a fueled core cell in Operational Condition 5, to be exempt from the communication requirements of TS Section 3/4.9.5 when the control rod is moved with its normal drive system.

The information supporting the proposed changes is subdivided as follows.

1. Attachment A gives a description and safety analysis of the proposed changes.

2. Attachment B includes the marked-up TS pages with the proposed changes indicated.

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3. Attachment C describes our evaluation performed in accordance with 10 CFR 50.92(c), which provides information supporting a finding of no significant hazards consideration.

4. Attachment D provides information supporting an Environmental Assessment.

The proposed changes have been reviewed by the LaSalle County Station Plant Operations Review Committee (PORC) and approved by the Nuclear Safety Review Board (NSRB) in accordance with the Quality Assurance Program.

ComEd is notifying the State of Illinois of this application for amendment by transmitting a copy of this letter and its attachments to the designated State Official.

Should you have any questions concerning this letter, please contact Mr. Frank A. Spangenberg, III, Regulatory Assurance Manager, at (815) 357-6761, extension 2383.

Respectfully,

Charles G. Pardee
Site Vice President
LaSalle County Station

Attachments

Attachment A: Description and Safety Analysis for the Proposed Changes
Attachment B: Marked-up Technical Specification Pages for the Proposed Changes
Attachment C: Information Supporting a Finding of No Significant Hazards Consideration
Attachment D: Information Supporting an Environmental Assessment

cc: Regional Administrator – NRC Region III
NRC Senior Resident Inspector – LaSalle County Station
Office of Nuclear Facility Safety – Illinois Department of Nuclear Safety

STATE OF ILLINOIS)

IN THE MATTER OF)

COMMONWEALTH EDISON COMPANY)

LASALLE COUNTY STATION - UNIT 1 and UNIT 2) Docket Nos. 50-373
50-374

Subject: Application for Amendment to Appendix A, Technical Specifications, Section 3/4.9.5, "Communications"

AFFIDAVIT

I affirm that the content of this transmittal is true and correct to the best of my knowledge, information and belief.

Charles G. Pardee
Site Vice President
LaSalle County Station

Subscribed and sworn to before me, a Notary Public in and for the State above named, this 25th day of April, 2000.
My Commission expires on 10-1, 2000.

OFFICIAL SEAL
DEBRA J. FEENEY
NOTARY PUBLIC, STATE OF ILLINOIS
MY COMMISSION EXPIRES10-1-2000

Notary Public

DESCRIPTION AND SAFETY ANALYSIS FOR THE PROPOSED CHANGES

A. SUMMARY OF THE PROPOSED CHANGES

In accordance with 10 CFR 50.90, "Application for amendment of license or construction permit," Commonwealth Edison (ComEd) Company proposes changes to Appendix A, Technical Specifications (TS), of Facility Operating License Nos. NPF-11 and NPF-18. Specifically, we propose to change TS Section 3/4.9.5, "Communications." TS Section 3/4.9.5 requires that direct communications be maintained between the control room and the refueling platform personnel during Core Alterations in Operational Condition 5, "Refueling."

The purposed changes, for Units 1 and 2, to TS Section 3/4.9.5, will reinsert part of a footnote that was deleted in Amendment No. 136 to Facility Operation License No. NPF-11 and Amendment No. 121 to Facility Operation License No. NPF-18. The footnote will allow the movement of a control rod in a fueled core cell during Core Alterations in Operational Condition 5, to be exempt from the communication requirements of TS Section 3/4.9.5 when the control rod is moved with its normal drive system. The purpose of the proposed changes is to exempt the movement of one control rod when fuel is not being moved, from the communication requirements for fuel movement specified in TS Section 3/4.9.5.

The proposed changes are described in Section E of this Attachment. The marked up TS pages are shown in Attachment B.

B. DESCRIPTION OF THE CURRENT REQUIREMENTS

TS Section 3/4.9.5 requires that direct communications be maintained between the control room and the refueling platform personnel during Core Alterations in Operational Condition 5. When communications between the control room and the refueling platform personnel cannot be maintained, Core Alterations must be immediately suspended.

C. BASES FOR THE CURRENT REQUIREMENTS

The TS Section 3/4.9.5 requirement to maintain direct communications between the control room and the refueling platform personnel ensures that refueling station personnel can be promptly informed of significant changes in the facility status or core reactivity condition during the movement of fuel within the reactor pressure vessel (RPV).

D. NEED FOR REVISION OF THE REQUIREMENTS

ComEd, in a submittal dated August 13, 1999, proposed changes to TS Section 1.0, "Definitions," Item 1.7, "Core Alteration," to allow maintenance and replacement of control rod drive mechanisms and nuclear instrumentation to be conducted without these activities being designated as Core Alterations. The NRC, in a letter dated October 18, 1999, approved these proposed changes by issuing Amendment No. 136, to the Facility Operating License of Unit 1, and Amendment No. 121, to the Facility Operating License of Unit 2.

LaSalle County Station, Unit 1, used the revised Core Alteration definition, during the most recent Unit 1 refueling outage, L1R08, in the Fall of 1999. One of the changes contained in the August 13, 1999 submittal, was the removal of the footnote to TS Section 3/4.9.5. The footnote exempted the movement of incore instrumentation and control rods, with their normal drive systems, from the requirements of TS Section 3/4.9.5. The footnote was removed to ensure that the command and control associated with fuel movements was not impacted by the proposed change to the Core Alteration definition by ensuring that the refueling platform personnel are promptly informed of significant changes in the facility status or core reactivity condition, during the movement of fuel within the RPV.

A result of our August 13, 1999 submittal was revealed during the Unit 1 refueling outage. During Core Alterations in Operational Condition 5, individual control rod drive mechanisms may be exercised in accordance with TS Section 3/4.9.3, "Control Rod Position." TS Section 3/4.9.3 allows the movement of one control rod at a time, in a fueled core cell, under the control of the reactor mode switch Refuel position one-rod-out interlock. The control rod movement is controlled from the control room and uses the normal control rod drive system. The revised Core Alteration definition and removal of the footnote to TS Section 3/4.9.5, required that when a control rod is moved in accordance with TS Section 3/4.9.3, the refueling platform must be staffed to meet the communication requirement of TS Section 3/4.9.5. This required staffing of the refueling platform, during periods when fuel is not being moved, was missed during our review of the proposed changes to the Core Alterations definition.

E. DESCRIPTION OF THE PROPOSED CHANGES

The proposed changes revise TS Section 3/4.9.5 by inserting the following TS Applicability footnote to at the bottom of TS page 3/4 9-7.

> Except movement of control rods with their normal drive system.

F. SAFETY ANALYSIS OF THE PROPOSED CHANGES

LaSalle County Station, Units 1 and 2, exercises control rods during Core Alterations in Operational Condition 5. The required plant conditions for this control rod movement are specified in TS Section 3/4.9.3. TS Section 3/4.9.3 permits the movement of one control rod in a fueled core cell if the following requirements are satisfied.

- All other control rods are in, and
- The control rod being moved is under the control of the reactor mode switch Refuel position one-rod-out interlock.

The control rod being moved under the control of the reactor mode switch Refuel position one-rod-out interlock is required to meet TS Section 3/4.1.3.5, "Control Rod Scram Accumulators," TS Section 3/4.1.3.6, "Control Rod Drive Coupling," and TS Section 3/4.1.3.7, "Control Rod Position Indication." In addition, TS Table 3.3.1-1, "Reactor Protection System Instrumentation," requires the following Functional Units to be operable in Operational Condition 5 with any control rod withdrawn.

1.a. "Intermediate Range Monitors: Neutron Flux – High,"
1.b. "Intermediate Range Monitors: Inoperative,"
8. "Scram Discharge Volume Water Level – High,"
11. "Reactor Mode Switch Shutdown Position," and
12. "Manual Scram."

The above identified TS requirements insure that sufficient plant equipment is operable to cause the control rod being moved under control of the reactor mode switch Refuel position one-rod-out interlock, to insert if a reactivity excursion was to occur. Additionally, the reactor mode switch Refuel position one-rod-out interlock will prevent a second control rod from being withdrawn.

The exercising of control rods during Core Alterations in Operational Condition 5, in accordance with TS Section 3/4.9.3, is controlled by operators in the control room and does not occur when fuel is being moved in the RPV. In addition, TS Section 3/4.9.1 requires the reactor mode switch Refuel position all-rods-in interlock to be operable for equipment used to perform Core Alterations.

The proposed changes to insert a footnote to allow the movement of a control rod, in a fueled core cell, in Operational Condition 5, to be exempt from the communication requirements of TS Section 3/4.9.5 when the control rod is moved with its normal drive system is acceptable based on the following.

- The movement of the control rod will be consistent with the requirements of TS Section 3/4.9.3,
- The movement of the control rod will not occur when fuel is being moved in the RPV,
- The need to staff the refueling platform to meet the communication requirements of TS Section 3/4.9.3, when fuel is not being moved, was never intended by our August 13, 1999 submittal and does not meet the intent of TS Section 3/4.9.5, and
- The proposed changes are consistent with TS Bases Section 3/4.9.5.

Thus, the work associated with exercising the control rods does not require the staffing of the refueling platform.

G. IMPACT ON PREVIOUS SUBMITTALS

We have reviewed the proposed changes regarding impact on any previous submittals, and have determined that there is no impact on any outstanding previous submittals.

H. SCHEDULE REQUIREMENTS

We request approval of this submittal by October 2, 2000, to support the LaSalle County Station, Unit 2, upcoming refueling outage,L2R08, currently scheduled for early November 2000.

ATTACHMENT B
Proposed Changes to the Technical Specifications for
LaSalle County Station, Units 1 and 2

MARKED-UP TS PAGES FOR PROPOSED CHANGES

REVISED PAGES

NPF-11	NPF-18
3/4 9-7	3/4 9-7

REFUELING OPERATIONS

3/4.9.5 COMMUNICATIONS

LIMITING CONDITION FOR OPERATION

3.9.5 Direct communication shall be maintained between the control room and refueling platform personnel.

APPLICABILITY: OPERATIONAL CONDITION 5, during CORE ALTERATIONS.*

ACTION:

When direct communication between the control room and refueling platform personnel cannot be maintained, immediately suspend CORE ALTERATIONS.

SURVEILLANCE REQUIREMENTS

4.9.5 Direct communication between the control room and refueling platform personnel shall be demonstrated within one hour prior to the start of and at least once per 12 hours during CORE ALTERATIONS.

* Except movement of control rods with their normal drive system.

REFUELING OPERATIONS

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4.9.5 Direct communication between the control room and refueling platform personnel shall be demonstrated within one hour prior to the start of and at least once per 12 hours during CORE ALTERATIONS.

* Except movement of control rods with their normal drive system

INFORMATION SUPPORTING A FINDING OF NO SIGNIFICANT HAZARDS CONSIDERATION

ComEd has evaluated the proposed changes and determined that they do not involve a significant hazards consideration. According to 10 CFR 50.92(c), a proposed amendment to an operating license involves no significant hazards consideration if operation of the facility in accordance with the proposed amendment would not:

> Involve a significant increase in the probability of occurrence or consequences of an accident previously evaluated;
>
> Create the possibility of a new or different kind of accident from any previously analyzed; or
>
> Involve a significant reduction in a margin of safety.

The purposed changes revise for Units 1 and 2, Technical Specification (TS) Section 3/4.9.5, "Communications," to reinsert part of a footnote that was deleted in Amendment No. 136 to Facility Operation License No. NPF-11 and Amendment No. 121 to Facility Operation License No. NPF-18. The footnote will allow the movement of a control rod, in a fueled core cell, in Operational Condition 5, "Refueling," to be exempt from the communication requirements of TS Section 3/4.9.5 when the control rod movement is with its normal drive system.

The determination that the criteria set forth in 10 CFR 50.92 (c) is met for this amendment request is indicated below.

Does the change involve a significant increase in the probability or consequences of an accident previously evaluated?

> TS Section 3/4.9.5 requires that direct communications be maintained between the control room and the refueling platform personnel during Core Alterations in Operational Condition 5. The requirement to have direct communications maintained between the control room and the refueling platform personnel does not have an effect on any accident previously evaluated or the associated accident assumptions. Thus, the proposed changes do not significantly increase the probability of an accident previously evaluated.
>
> The proposed changes do not adversely effect the integrity of the reactor coolant system or secondary containment. As such, the radiological consequences of previously evaluated accidents are not changed. Therefore, the proposed changes do not increase the consequences of an accident previously evaluated.

Does the change create the possibility of a new or different kind of accident from any accident previously evaluated?

The proposed changes do not affect the assumed accident performance of any structure, system or component previously evaluated. The proposed changes do not introduce any new modes of system operation or failure mechanisms.

Thus, this proposed changes do not create the possibility of a new or different kind of accident from any accident previously evaluated.

Does the change involve a significant reduction in a margin of safety?

LaSalle County Station, Units 1 and 2, exercise control rods during Core Alterations in Operational Condition 5. The required plant conditions for this control rod movement are specified in TS Section 3/4.9.3, "Control Rod Position." TS Section 3/4.9.3 allows the movement of one control rod at a time, in a fueled core cell, under control of the reactor mode switch Refuel position one-rod-out interlock. The exercising of control rods under the control of the reactor mode switch Refuel position one-rod-out interlock is controlled by operators in the control room and does not occur when fuel is being moved in the reactor pressure vessel (RPV).

The proposed changes do not affect the margin of safety as the movement of a control rod will continue to satisfy the requirements of TS Section 3/4.9.3 and will not occur when fuel is being moved in the RPV.

Thus, this proposed change does not involve a significant reduction in a margin of safety.

Therefore, based upon the above evaluation, we have concluded that this change does not constitute a significant hazards consideration.

ATTACHMENT D
Proposed Changes to Technical Specifications for
LaSalle County Station, Units 1 and 2

INFORMATION SUPPORTING AN ENVIRONMENTAL ASSESSMENT

ComEd has evaluated the proposed changes against the criteria for identification of licensing and regulatory actions requiring environmental assessment in accordance with 10 CFR 51.21. ComEd has determined that the proposed changes meet the criteria for a categorical exclusion set forth in 10 CFR 51.22(c)(9) and as such, has determined that no irreversible consequences exist in accordance with 10 CFR 50.92(b). This determination is based on the fact that this change is being proposed as an amendment to a license issued pursuant to 10 CFR 50 that changes a requirement with respect to installation or use of a facility component located within the restricted area, as defined in 10 CFR 20, or that changes an inspection or a surveillance requirement, and the proposed changes meet the following specific criteria.

(i) The proposed changes involve no significant hazards consideration.

The proposed changes do not involve a significant hazards consideration.

(ii) There is no significant change in the types or significant increase in the amounts of any effluent that may be released offsite.

The proposed changes will not change the types or significantly increase the amounts of any effluents released offsite.

(iii) There is no significant increase in individual or cumulative occupational radiation exposure.

The proposed changes will not result in changes in the operation or configuration of the facility. There will be no change in the level of controls or methodology used for processing of radioactive effluents or handling of solid radioactive waste, nor will the proposal result in any change in the normal radiation levels within the plant. Therefore, there will be no increase in individual or cumulative occupational radiation exposure resulting from the proposed changes.