

Commonwealth Edison Company  
LaSalle Generating Station  
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August 11, 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:** Revision to LaSalle County Station Relief Request PR-12

**Reference:** Letter from C.G. Pardee (Commonwealth Edison (ComEd) Company) to U.S. Nuclear Regulatory Commission, "Submittal of Relief Request PR-12," dated April 11, 2000.

LaSalle County Station performs Inservice Inspections in accordance with the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code, Section XI, "Rules for Inservice Inspection of Nuclear Power Plant Components," 1989 Edition. The enclosed relief request addresses requirements in Table, IWC-2500-1, "Examination Category C-H, All Pressure Retaining Components."

Section XI requires periodic examinations of pressure retaining piping and components for evidence of leakage during system pressure testing. Relief is requested from certain Code required examinations of the Hydrogen Recombiner System piping. Relief is being requested pursuant to 10 CFR 50.55a(a)(3)(ii), on the basis that compliance with the ASME Section XI Code requirements is deemed to be a hardship or unusual difficulty without a compensating increase in the level of quality or safety. We submitted this relief request originally by the above referenced letter dated April 11, 2000.

This request for relief replaces the referenced request for relief and retains the same relief request number, PR-12, now designated as Revision 1. The changes to the relief request are based on a conference call with the NRC on June 27, 2000.

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Relief request PR-12 is applicable to both Units 1 & 2. ComEd requests approval of this request by September 1, 2000 to support our eighth Unit 2 refueling outage (L2R08), which is scheduled to begin on November 10, 2000. In addition, ComEd requests that the relief extend throughout the remainder of the Second 10-Year Inservice Inspection Interval.

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,

A handwritten signature in black ink, appearing to read 'C. Pardee', with a long horizontal flourish extending to the right. Below the signature, the letters 'for' are written in a smaller, cursive script.

Charles G. Pardee  
Site Vice President  
LaSalle County Station

Attachment

cc: Regional Administrator - NRC Region III  
NRC Senior Resident Inspector - LaSalle County Station

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**COMPONENT IDENTIFICATION**

Code Class: 2  
References: Table IWC-2500-1, Category C-H, and IWC-5210(b)  
Examination Category: C-H  
Item Numbers: C7.30, C7.40, C7.70, C7.80  
Description: Hydrogen Recombiner System Piping  
Component Numbers: From check valve 1HG007 to check valve 2HG016  
From check valve 1HG016 to check valve 2HG007  
From valve 1HG009 to valve 2HG006B  
From valve 1HG006B to valve 2HG009

**CODE REQUIREMENTS**

Section XI Table IWC-2500-1, Category C-H, requires system pressure tests in accordance with IWC-5221 or IWC-5222, as well as a visual examination (VT-2) to be performed during the system pressure tests each Inspection Period.

Section XI, IWC-5210(b) requires that pressure test procedures include methods to detect and locate through-wall leakage when air is used as the pressurizing medium.

**BASIS FOR RELIEF**

Pursuant to 10 CFR 50.55a(a)(3)(i), relief is requested on the basis that the proposed alternative would provide an acceptable level of quality and safety.

Relief is requested from the system pressure test requirements of IWC-5221 and IWC-5222 and the periodicity requirements of Table IWC-2500-1, as well as the requirements of IWC-5210(b) as applied to the cross-tie piping of the Hydrogen Recombiner System, as depicted on page 3 in Figure PR-12.1, and as defined in above Component Numbers. Air is used as the pressurizing medium for the Hydrogen Recombiner System because the system contains air during normal operation. The application of a leak detection solution (e.g., soap bubble solution) to the surface of the piping would be necessary per IWC-5210(b) in order to allow for the detection and location of potential through-wall air leakage. To access the surface of the cross-tie piping, scaffolding will be required because there are long runs of piping located approximately 30 feet overhead. An estimated 600 man hours and accumulated dose of 1.25 Rem would be required to erect scaffolding and perform a leakage test of cross tie piping. Furthermore, a significant amount of scaffolding would have to be erected around several sensitive instrument racks and systems on both units that if jarred could result in a unit trip or other challenges to the operators.

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Alternatively, LaSalle County Station will challenge the unit cross-tie piping to provide assurance of its structural integrity by performing pressure test at peak accident pressure and applying a soap bubble solution to all pipe welds once per Inspection Interval. Necessary scaffolding will be erected and leak detection solution will be applied to the surface of the unit cross-tie piping to the extent required by IWC-5210(b) if through wall leakage is detected during pressure testing of accessible components and associated piping, which is performed once every Inspection Period, or if through wall leakage is detected during pressure testing unit cross tie piping welds. The condition of the accessible components as determined by pressure testing of the accessible components once every Inspection Period in accordance with the Section XI rules would be indicative of that of the inaccessible components. Both the accessible and “inaccessible” components are designed/constructed to the same requirements and subject to similar operating conditions. Additionally, the Hydrogen Recombiners, including the unit cross-tie piping , are functionally tested every refuel outage to verify system temperature, pressure, and flow requirements to further insure system operability and structural integrity.

Based on the above discussion, reasonable assurance of the unit cross-tie piping structural integrity is achieved by the performance of the alternate pressure test of piping welds once every Inspection Interval.

**PROPOSED ALTERNATE EXAMINATION**

A pressure test will be performed on the unit cross-tie piping welds, at peak accident pressure, once each Inspection Interval.

Necessary scaffolding will be erected and leak detection solution will be applied to the surface of the unit cross-tie piping to the extent required by IWC-5210(b) if:

- Through wall leakage is detected during pressure testing of accessible components and associated piping. (Remainder of system for which no relief is requested)

OR

- Through wall leakage is detected during pressure testing of unit cross tie piping welds.

**APPLICABLE TIME PERIOD**

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

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Figure PR-12.1

