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LaSalle Generating Station  
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August 18, 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:** Supplement to Application for Amendment to Appendix A, Technical Specifications, Section 3/4.4.6, "Pressure/Temperature Limits, Reactor Coolant System," and Request for Exemption from 10 CFR 50.60, "Acceptance Criteria for Fracture Prevention Measures for Lightwater Nuclear Power Reactors for Normal Operation"

**Reference:** Letter from R. M. Krich (ComEd) to U.S. NRC, "Application for Amendment to Appendix A, Technical Specifications, Section 3/4.4.6, "Pressure/Temperature Limits, Reactor Coolant System," and Request for Exemption from 10 CFR 50.60, "Acceptance Criteria for Fracture Prevention Measures for Lightwater Nuclear Power Reactors for Normal Operation,"" dated February 29, 2000

In the Referenced letter, Commonwealth Edison (ComEd) Company requested changes to the Technical Specifications (TS) for LaSalle County Station, Units 1 and 2. The proposed changes revise the Pressure-Temperature (P-T) limits for the Reactor Pressure Vessel (RPV) of each unit for a maximum of 32 Effective Full Power Years (EFPY).

In a teleconference between members of the NRC and ComEd on August 2, 2000, the NRC stated that the neutron fluence calculations used to develop the revised P-T limits were not updated to current methods.

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The purpose of this letter is to request NRC approval of the 32 EFPY P-T limits until December 15, 2002 for LaSalle County Station, Units 1 and 2. This request for interim approval is conservative because the maximum vessel operating times attained on December 15, 2002 will be approximately 12.2 EFPY for Unit 1 and 11.8 EFPY for Unit 2. These operating times are based on a 100% capacity factor and represent a maximum of 38.3% of the proposed 32 EFPY limit for the P-T limits. This provides significant margin to ensure that the current 32 EFPY fluence projection will not be exceeded prior to further NRC review. We are requesting this interim approval period to allow sufficient time to resolve the neutron fluence calculations issue.

We have been in discussion on this issue with the Boiling Water Reactor Owners Group (BWROG). Prior to December 15, 2002 we will request approval of the proposed 32 EFPY limit for the P-T limits to the full-term operating license expiration date. Our current plans are to either address this issue as part of BWROG industry effort or to prepare new LaSalle County Station fluence calculations to support the revised P-T limits. These new calculations will be based on current neutron transfer calculation methods and modern fluence libraries as recommended in Draft Regulatory Guide DG-1053, "Calculational and Dosimetry Methods for Determining Pressure Vessel Neutron Fluence," dated September, 1999.

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

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