November 9, 2000

Mr. Oliver D. Kingsley, President
Nuclear Generation Group
Commonwealth Edison Company
Executive Towers West III
1400 Opus Place, Suite 500
Downers Grove, IL 60515

SUBJECT: LASALLE, UNITS 1 AND 2 - ISSUANCE OF AMENDMENTS (TAC NOS. MA8820 AND MA8821)

Dear Mr. Kingsley:

The U.S. Nuclear Regulatory Commission (Commission) has issued the enclosed Amendment No. 145 to Facility Operating License No. NPF-11 and Amendment No. 131 to Facility Operating License No. NPF-18 for the LaSalle County Station, Units 1 and 2, respectively. The amendments are in response to your application dated April 28, 2000.

The amendments revise License Condition 2.C.(37) for Unit 1 and License Condition 2.C.(21) for Unit 2, to specify the types of fuel movements that can not be performed during refueling unless all control rods are fully inserted.

A copy of the Safety Evaluation is also enclosed. The Notice of Issuance will be included in the Commission's biweekly Federal Register notice.

Sincerely,

/RA/

Donna M. Skay, Project Manager, Section 2
Project Directorate III
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket Nos. 50-373, 50-374

Enclosures:
1. Amendment No. 145 to NPF-11
2. Amendment No. 131 to NPF-18
3. Safety Evaluation

cc w/encls: See next page

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* input provided by memo dated 9/22/00; no significant changes

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

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Nuclear Generation Group
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Project Directorate III
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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

COMMONWEALTH EDISON COMPANY

DOCKET NO. 50-373

LASALLE COUNTY STATION, UNIT 1

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 145
License No. NPF-11

1. The Nuclear Regulatory Commission (the Commission) has found that:

   A. The application for amendment filed by the Commonwealth Edison Company (the licensee), dated April 28, 2000, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's regulations set forth in 10 CFR Chapter I;

   B. The facility will operate in conformity with the application, the provisions of the Act, and the regulations of the Commission;

   C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations set forth in 10 CFR Chapter I;

   D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and

   E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, the Operating License is amended as indicated in the attachment to this license amendment.

3. This license amendment is effective as of the date of its issuance and shall be implemented within 30 days.

FOR THE NUCLEAR REGULATORY COMMISSION

Anthony J. Mendiola, Chief, Section 2
Project Directorate III
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Attachment:
Changes to the Operating License

Date of Issuance: November 9, 2000

ATTACHMENT TO LICENSE AMENDMENT NO. 145

FACILITY OPERATING LICENSE NO. NPF-11

DOCKET NO. 50-373

Replace the following page of Operating License NPF-11 with the attached revised page. The revised page is identified by amendment number and contains a vertical line indicating the area of change.

REMOVE	INSERT
16a	16a

2.C.(34) Deleted.

2.C.(35) Surveillance Interval Extension

The performance interval for those surveillance requirements identified in the licensee's request for surveillance interval extension dated April 11, 1995, shall be extended to April 5, 1996, to coincide with the Unit 1 seventh refueling outage schedule. The extended interval shall not exceed a total of 25.1 months for 18 month surveillances.

2.C.(36) Relocated Technical Specifications

Commonwealth Edison Company shall relocate certain technical specification requirements to licensee-controlled documents as described below. The location of these requirements shall be retained by the licensee.

a. This license condition approves the relocation of certain technical specification requirements to licensee-controlled documents (UFSAR), as described in the licensee's application dated October 31, 1996. The approval is documented in the staff's safety evaluation dated January 29, 1997. This license condition is effective as of its date of issuance by Amendment No. 117 and shall be implemented within 90 days from the date of issuance. Implementation shall include the relocation of technical specifications requirements to the appropriate licensee-controlled document as identified in the licensee's application dated October 31, 1996.

2.C.(37) The licensee is prohibited from loading and shuffling any fuel assemblies within the reactor pressure vessel unless all control rods are fully inserted during refueling in Mode 5.

D. The facility requires exemptions from certain requirements of 10 CFR Part 50, 10 CFR Part 70, and 10 CFR Part 73. These include:

(a) Exemptions from certain requirements of Appendices G, H and J and 10 CFR Part 73 are described in the Safety Evaluation Report and Supplement No. 1, No. 2 and No. 3 to the Safety Evaluation Report.

(b) An exemption was requested until the completion of the first refueling from the requirements of 10 CFR 70.24.

(c) An exemption from 10 CFR Part 50, Appendix E from performing a full scale exercise within one year before issuance of an operating license, both exemptions (b) and (c) are described in Supplement No. 2 of the Safety Evaluation Report.

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

COMMONWEALTH EDISON COMPANY

DOCKET NO. 50-374

LASALLE COUNTY STATION, UNIT 2

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 131
License No. NPF-18

1. The Nuclear Regulatory Commission (the Commission) has found that:

   A. The application for amendment filed by the Commonwealth Edison Company (the licensee), dated April 28, 2000, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's regulations set forth in 10 CFR Chapter I;

   B. The facility will operate in conformity with the application, the provisions of the Act, and the regulations of the Commission;

   C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations set forth in 10 CFR Chapter I;

   D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and

   E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, the Operating License is amended as indicated in the attachment to this license amendment.

3. This license amendment is effective as of the date of its issuance and shall be implemented within 30 days.

FOR THE NUCLEAR REGULATORY COMMISSION

Anthony J. Mendiola, Chief, Section 2
Project Directorate III
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Attachment:
Changes to the Operating License

Date of Issuance: November 9, 2000

ATTACHMENT TO LICENSE AMENDMENT NO. 131

FACILITY OPERATING LICENSE NO. NPF-18

DOCKET NO. 50-374

Replace the following page of Operating License NPF-18 with the attached revised page. The revised page is identified by amendment number and contains a vertical line indicating the area of change.

REMOVE	INSERT
9a	9a

2.C.(20) Relocated Technical Specifications

Commonwealth Edison Company shall relocate certain technical specification requirements to licensee-controlled documents as described below. The location of these requirements shall be retained by the licensee.

a. This license condition approves the relocation of certain technical specification requirements to licensee-controlled documents (UFSAR), as described in the licensee's application dated October 31, 1996. The approval is documented in the staff's safety evaluation dated January 29, 1997. This license condition is effective as of its date of issuance by Amendment No. 102 and shall be implemented within 90 days from the date of issuance. Implementation shall include the relocation of technical specifications requirements to the appropriate licensee-controlled document as identified in the licensee's application dated October 31, 1996.

2.C.(21) The licensee is prohibited from loading and shuffling any fuel assemblies within the reactor pressure vessel unless all control rods are fully inserted during refueling in Mode 5.

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 145 TO FACILITY OPERATING LICENSE NO. NPF-11

AND AMENDMENT NO. 131 TO FACILITY OPERATING LICENSE NO. NPF-18

COMMONWEALTH EDISON COMPANY

LASALLE COUNTY STATION, UNITS 1 AND 2

DOCKET NOS. 50-373 AND 50-374

1.0 INTRODUCTION

In accordance with 10 CFR 50.90, Commonwealth Edison Company (ComEd, the licensee) submitted an application dated April 28, 2000, to amend facility operating licenses NPF-11 and NPF-18 for the LaSalle County Station, Units 1 and 2. The licensee proposed to rephrase license conditions 2.C.(37) and 2.C.(21) for Units 1 and 2, respectively. The proposed license conditions will prohibit the loading and shuffling of fuel in the reactor pressure vessel unless all control rods are inserted during Operational Mode 5, Refueling.

In an August 13, 1999, amendment request, as supplemented, ComEd had requested to adopt the Standard Technical Specification (STS) definition of core alteration, which allows the maintenance and replacement of multiple control rod drives and nuclear instrumentation while in Operational Mode 5. Because ComEd did not adopt the related refueling limiting conditions for operation (LCOs), which limit the type of refueling scheme (core offload/reload, fuel shuffle) allowed during maintenance on multiple control rods (CRs) or control rod drive (CRD) mechanisms, the staff believed that additional restrictions were necessary to ensure that the fuel movements performed while multiple CRs or their associated drives are withdrawn or removed from defueled cells did not increase the risk of inadvertent criticality. The licensee committed to refrain from moving fuel assemblies within the reactor pressure vessel unless all control rods except one are fully inserted. The staff formalized the licensee's commitment as license conditions 2.C.(37) and 2.C.(21). However, during the LaSalle, Unit 1, refueling outage in fall 1999, an unanticipated situation developed which required maintenance to a control rod drive in a fueled core cell. Due to the restrictions in the license condition, the core cell could not be immediately defueled and the control rod drive repaired because other control rods had been removed. Because the intent of the original license condition was to restrict movements of fuel into core cells (with the potential of placing the fuel in an incorrect cell) the licensee proposed to rephrase these license conditions in its April 28, 2000, request to allow fuel to be unloaded from the vessel while multiple control rods are withdrawn. In the proposed rephrased license conditions, rather than restricting all movement of fuel, the licensee will not be allowed to load or shuffle fuel while multiple control rods are removed.

2.0 BACKGROUND

In general, reactivity in boiling water reactors (BWRs) during refueling can be changed either by CR withdrawals or by fuel movements. Safe reactivity management during refueling forbids, or at least limits, simultaneous activities that affect core reactivity. Instead of analyzing the possible reactivity-initiated events and their radiological consequences, General Electric (GE) designed the refueling interlocks to prevent inadvertent reactivity-initiated events. With the reactor mode switch in the refuel position, the refueling interlocks receive and process signals from the refueling equipment. The refueling platform position indication interlock senses whether the platform is over or near the core, the refueling platform main hoist grapple senses whether fuel is loaded, and the all-rods-in interlock senses whether all the control rods are inserted to their full-in position. The refueling equipment interlocks combine the signals to enforce the design basis assumptions by preventing: (1) the operation of the refueling equipment to move fuel if all CRs are not inserted, and (2) CR withdrawals if fuel loading is in progress. The one-rod-out interlock prevents the selection and withdrawal of a second CR if a CR is already withdrawn and the shutdown margin (SDM) provides assurances that the core will remain subcritical with the highest worth CR withdrawn.

The CRD design also makes it physically difficult to decouple and remove a control rod blade without initially removing the fuel assemblies from the corresponding fuel cell. The one-rod-out interlock and the refueling equipment interlocks prevent inadvertent fuel loading into defueled uncontrolled cells and also prevents the withdrawal of a CR or the loading of a defueled cell next to or near another loaded fuel cell with a withdrawn CR. Core physics calculations indicate that the creation of two loaded adjacent uncontrolled fuel cells may result in prompt critical conditions. If the loaded uncontrolled fuel cells (LUFCs) are separated by an inserted CR, a critical condition can ensue. But if two LUFCs are separated by two inserted CRs, the core reactivity will remain subcritical. Two LUFCs can be created by an inadvertent CR withdrawal adjacent to a loaded uncontrolled fuel cell, and inadvertent loading of fuel into defueled uncontrolled fuel cells can also result in LUFCs.

BWRs were originally designed for single CR/CRD maintenance under the control of the refueling hardware interlocks. Reactors were originally refueled by fuel shuffling including discharging of twice-burned fuel and loading of new fuel. Since a full set of double blade guides were available to support the inserted CRs, the full-in position indications were not jumpered and all CRs were inserted. The TSs reflected these design bases by prohibiting fuel movement unless all CRs were inserted and required: (1) the interlocks to be operable at all times, (2) a 5x5 array centered around the withdrawn rod to be inserted and disarmed to prevent inadvertent CR withdrawals leading to two LUFCs, (3) the SDM requirement to be met, and (4) the source range monitors to be operable. The CR blade problems emerged in the late 1970s and the licensees started bypassing the position indications for multiple CR maintenance during fuel shuffling. The industry also needed to perform in-vessel maintenance and adopted the core offload/reloaded refueling scheme. Consequently, the industry revised the refueling LCOs to allow multiple CR maintenance. This involved jumpering the position indications for the selected CRs and suspending some related refueling LCOs and/or adding footnotes with exceptions to the LCO requirements.

Subsequently, GE issued service information letter (SIL) 372 to warn the industry of the potential risk of fuel loading errors if multiple CR maintenance and fuel shuffling are scheduled together. NRC also issued Information Notice 88-21 to alert the industry to inadvertent criticality events. The events involved inadvertent CR withdrawals during CR testing when the interlocks associated with the CRs were bypassed. In 1995, the Electric Power Research Institute (EPRI) sponsored a GE refueling study (NSAC-164L). EPRI surveyed the industry to determine current refueling practices, identified potential refueling events, and analyzed the probability of these reactivity-initiated events. GE also performed sensitivity studies of the affects of prevalent refueling practices on the probabilities of the refueling events. The study concluded with a series of recommendations for safe reactivity management practices during refueling.

3.0 EVALUATION

3.1 Background

In an August 13, 1999, amendment request, as supplemented, the licensee committed not to move any fuel within the pressure vessel with multiple control rods removed or withdrawn. In an August 27, 1999, supplement, the licensee stated that "during both the initial and final shuffles, all rods will be in compliance with the TS for control rod position (i.e., TS Section 3.9.3, "Control Rod Position") that requires all control rods to be fully inserted, with the exception that one rod is permitted to be withdrawn as permitted by the mode switch refueling interlock." The supplement also stated that "during the open vessel work window with multiple control rods removed or withdrawn, ComEd will not perform any fuel movement within the RPV." The staff formalized the licensee commitment as License Conditions 2.C.(37) and 2.C.(21). The main objective of these license conditions is to prevent fuel movement when multiple control rods or their associated CRD mechanisms are under maintenance in order to minimize the risk of inadvertent refueling accidents.

3.2 Requested Action

License Conditions 2.C.(37) and 2.C.(21) currently state:

> The licensee is prohibited from moving any fuel assemblies within the reactor pressure vessel unless all control rods except one are fully inserted during refueling in Mode 5.

The licensee proposes to rephrase the license conditions to:

> The licensee is prohibited from loading and shuffling any fuel assemblies within the reactor pressure vessel unless all control rods are fully inserted during refueling in Mode 5.

3.3 Staff's Review

LCO 3.9.3, "Control Rod Position," requires all control rods to be inserted during core alteration (fuel movement and control rod withdrawals from fueled cells), but a footnote in the LCO reads,

"Except control rods removed per specification 3.9.10.1 and 3.9.10.2." LCO 3.9.10.1, "Single Control Rod Removal," allows one control rod and/or the associated control rod drive (CRD) to be removed, and LCO 3.9.10.2, "Multiple Control Rod Maintenance," allows any number of CRs or their associated CRD to be removed for maintenance.

Fuel movement entails loading fuel into the core, shuffling fuel within the core, and unloading fuel from the core into the spent fuel pools. The proposed license conditions will continue to prohibit loading fuel into the core and shuffling fuel within the core while multiple control rods (approximately 10 percent of the CRs) are out for maintenance under LCO 3.9.10.2. This decreases the probability of fuel loading error (FLE) or inadvertent loading of fuel into uncontrolled defueled cells. For multiple control rod maintenance, the position indications for the selected CRs would have to be bypassed to indicate the full-in (00) position instead of the actual fully withdrawn (48) position. With the position indication bypassed for 10 percent of the CRs, the interlocks are effectively bypassed for the associated fuel cells.

If all of the CR/CRD maintenance has been completed and the CRs have been inserted, and the position indications jumpers removed, the refueling interlocks will be in effect during the fuel loading operation. Therefore, the proposed wording of the license conditions provide the appropriate safeguards by prohibiting fuel loading and shuffling unless all CRs are inserted.

The licensee submitted the current amendment request to avoid a situation, such as occurred in 1999, when fuel had to be unloaded while multiple CRs were withdrawn for maintenance. In the fall 1999 refueling outage, a control rod drive in a fueled core cell unexpectedly required maintenance and, due to the restrictions in the license condition, the core cell could not be immediately defueled and the control rod drive repaired because other control rods had been removed. Because the intent of the original license condition was to restrict movements of fuel into core cells (with the potential of placing the fuel in an incorrect cell) the licensee proposed to rephrase the license conditions in its April 28, 2000, request to allow fuel to be unloaded from the vessel while multiple control rods are withdrawn. The licensee stated in its application that unloading of fuel from the core will decrease core reactivity and increase the shutdown margin (SDM). The licensee added that proposed license condition will provide assurance that the core will be maintained sufficiently subcritical to preclude inadvertent criticality during the loading, shuffling and offloading of fuel assemblies.

Unloading of fuel from the core would reduce core reactivity and increase the SDM margin. However, the risk of refueling errors is also affected by the scheduling of multiple tasks that may require coordination of complex operations, especially if the built-in hardware is jumpered. The current license conditions require multiple CR maintenance work and fuel unloading operations to be scheduled separately; the licensee must defuel all of the selected control cells with all CRs inserted (full double blade guides support the CRs in the defueled cells) before starting the CR withdrawals from the defueled cells. (Note that if the position indications are jumpered after the withdrawal of each CR, the licensee could do maintenance on the CRs one by one.) However, under the proposed license condition, the licensee could schedule the multiple CR/CRD maintenance at the same time as the fuel unloading operation. Multiple CR withdrawals will involve defueling the selected control cells and installing the blade guides to support the CR, withdrawing the CR, removing the blade guide, bypassing the position indication of the selected CR, removing the blade guide, then decoupling and removing the CR

or the CRD mechanism. This process will require coordination between the control room operation staff, the under-vessel crew, the instrumentation technicians, and the refueling bridge personnel. If the fuel unloading operation (unloading the discharged fuel, most reactive fuel, and defueling the selected fuel cells) and the CR/CRD maintenance work are combined in order to make the most efficient use of the bridge travel, the complexity of the operation and the risk of human error will increase. The staff expects the licensee to be cognizant of this fact and schedule the fuel unloading and the multiple CR maintenance tasks in separate work blocks and not in parallel.

LaSalle, Unit 1, will refuel in November 2000 and Unit 2 is scheduled to refuel in the fall of 2001. In addition, ComEd had already submitted amendments requesting conversion of the LaSalle TSs to the STS. The approval and implementation of the TSs conversions are scheduled for March 2001. Therefore, the LaSalle LCO for multiple CR maintenance during refueling will, in the future, require core offload and spiral reload (depending on how the spent fuel pool capacity issues are resolved). This proposed change to the license condition will no longer be applicable when the LaSalle TSs are converted to the STS. The staff also expects the licensee to be cognizant for the possible increase in the risk of refueling errors if the multiple CR maintenance work and the fuel unloading operations are scheduled together. The staff, therefore, approves the proposed wording of license conditions 2.C.(37) and 2.C.(21).

4.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Illinois State official was notified of the proposed issuance of the amendments. The State official had no comments.

5.0 ENVIRONMENTAL CONSIDERATION

The amendments change a requirement with respect to the installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20. The NRC staff has determined that the amendments involve no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendments involve no significant hazards consideration, and there has been no public comment on such finding (65 FR 37422). Accordingly, the amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendments.

6.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendments will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributor: Z. Abdullahi
Date: November 9, 2000