

March 21, 2001

Mr. Oliver D. Kingsley, President
Exelon Nuclear
Exelon Generation Company, LLC
1400 Opus Place, Suite 500
Downers Grove, IL 60515

SUBJECT: LASALLE COUNTY STATION, UNITS 1 AND 2 - ENVIRONMENTAL
ASSESSMENT AND FINDING OF NO SIGNIFICANT IMPACT (TAC
NOS. MA8390 AND MA8388)

Dear Mr. Kingsley:

Enclosed is a copy of the Environmental Assessment and Finding of No Significant Impact related to your application for amendment dated March 3, 2000, as supplemented by letters dated March 24, June 5 (two letters), July 18, July 31, September 1, September 22, October 5, October 9, November 20, and December 18, 2000; and February 15, February 28, and March 7, 2001. The original application was submitted by Commonwealth Edison Company (ComEd), which merged to form Exelon Generation Company, LLC (EGC). By letter dated February 7, 2001, EGC assumed responsibility for all pending actions that were requested by ComEd.

The proposed amendment would convert the current Technical Specifications for LaSalle County Station, Units 1 and 2, to a set of improved Technical Specifications based on NUREG-1433, Revision 1, "Standard Technical Specifications, General Electric Plants BWR/4," dated April 1995, NUREG-1434, Revision 1, "Standard Technical Specifications, General Electric Plants BWR/6," dated April 1995, and on guidance provided in the Commission's "Final Policy Statement on Technical Specifications Improvements for Nuclear Power Reactors," published on July 22, 1993 (58 FR 39132).

The assessment is being forwarded to the Office of the Federal Register for publication.

Sincerely,

/RA/

Stewart N. Bailey, Project Manager, Section 2
Project Directorate III
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket Nos. 50-373, 50-374

Enclosure: Environmental Assessment

cc w/encl: See next page

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Docket Nos. 50-373, 50-374

Enclosure: Environmental Assessment

cc w/encl: See next page

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O. Kingsley
Exelon Generation Company, LLC

LaSalle County Station
Units 1 and 2

cc: w/enclosures

Exelon Generation Company, LLC
Site Vice President - LaSalle
22710 206th Avenue N.
Cordova, Illinois 61242-9740

Robert Cushing, Chief, Public Utilities Division
Illinois Attorney General's Office
100 W. Randolph Street
Chicago, Illinois 60601

Exelon Generation Company, LLC
Station Manager - LaSalle
22710 206th Avenue N.
Cordova, Illinois 61242-9740

Regional Administrator
U.S. NRC, Region III
801 Warrenville Road
Lisle, Illinois 60532-4351

Exelon Generation Company, LLC
Regulatory Assurance Manager - LaSalle
22710 206th Avenue N.
Cordova, Illinois 61242-9740

Illinois Department of Nuclear Safety
Office of Nuclear Facility Safety
1035 Outer Park Drive
Springfield, Illinois 62704

U.S. Nuclear Regulatory Commission
LaSalle Resident Inspectors Office
2605 N. 21st Road
Marseilles, Illinois 61341-9756

Document Control Desk-Licensing
Exelon Generation Company, LLC
1400 Opus Place, Suite 500
Downers Grove, Illinois 60515

Phillip P. Steptoe, Esquire
Sidley and Austin
One First National Plaza
Chicago, Illinois 60603

Mr. John Skolds
Chief Operating Officer
Exelon Generation Company, LLC
1400 Opus Place, Suite 900
Downers Grove, Illinois 60515

Assistant Attorney General
100 W. Randolph St. Suite 12
Chicago, Illinois 60601

Mr. John Cotton
Senior Vice President, Operation Support
Exelon Generation Company, LLC
1400 Opus Place, Suite 900
Downers Grove, Illinois 60515

Chairman
LaSalle County Board
707 Etna Road
Ottawa, Illinois 61350

Mr. William Bohlke
Senior Vice President, Nuclear Services
Exelon Generation Company, LLC
1400 Opus Place, Suite 900
Downers Grove, Illinois 60515

Attorney General
500 S. Second Street
Springfield, Illinois 62701

Chairman
Illinois Commerce Commission
527 E. Capitol Avenue, Leland Building
Springfield, Illinois 62706

Mr. H. Gene Stanley
Vice President
Mid-West Regional Operating Group
Exelon Generation Company, LLC
1400 Opus Place, Suite 900
Downers Grove, Illinois 60515

O. Kingsley
Exelon Generation Company, LLC

- 2 -

LaSalle County Station
Units 1 and 2

Mr. Christopher Crane
Senior Vice President
Mid-West Regional Operating Group
Exelon Generation Company, LLC
1400 Opus Place, Suite 900
Downers Grove, Illinois 60515

Mr. Jeffrey Benjamin
Vice President - Licensing And Regulatory
Affairs
Exelon Generation Company, LLC
1400 Opus Place, Suite 900
Downers Grove, Illinois 60515

Mr. R. M. Krich
Director - Licensing
Mid-West Regional Operating Group
Exelon Generation Company, LLC
1400 Opus Place, Suite 900
Downers Grove, Illinois 60515

Mr. Robert Helfrich
Senior Counsel, Nuclear
Mid-West Regional Operating Group
Exelon Generation Company, LLC
1400 Opus Place, Suite 900
Downers Grove, IL 60515

UNITED STATES NUCLEAR REGULATORY COMMISSION

EXELON GENERATION COMPANY, LLC

DOCKET NOS. 50-373 AND 50-374

ENVIRONMENTAL ASSESSMENT AND FINDING OF

NO SIGNIFICANT IMPACT

The U.S. Nuclear Regulatory Commission (NRC) is considering issuance of an amendment to Facility Operating License No. NPF-11 and NPF-18, issued to Exelon Generation Company, LLC, (EGC, or the licensee), for operation of LaSalle County Station, Units 1 and 2 (LaSalle), respectively, located in LaSalle County, Illinois. The original application was submitted by Commonwealth Edison Company (ComEd), which merged to form EGC. By letter dated February 7, 2001, EGC assumed responsibility for all pending NRC actions that were requested by ComEd.

ENVIRONMENTAL ASSESSMENT

Identification of the Proposed Action:

The proposed amendment would be a full conversion from the current Technical Specifications (CTS) to a set of improved Technical Specifications (ITS) based on NUREG-1433, "Standard Technical Specifications - General Electric Plants, BWR/4," Revision 1, dated April 1995, and NUREG-1434, "Standard Technical Specifications - General Electric Plants, BWR/6," Revision 1, dated April 1995. The proposed action is in accordance with the licensee's application dated March 3, 2000, as supplemented by letters dated March 24, June 5 (two letters), July 18, July 31, September 1, September 22, October 5, October 9, November 20, and December 18, 2000; and February 15, February 28, and March 7, 2001.

The Need for the Proposed Action:

It has been recognized that nuclear safety in all plants would benefit from improvement and standardization of Technical Specifications (TSs). The "NRC Interim Policy Statement on Technical Specification Improvements for Nuclear Power Reactors" (52 FR 3788) contained proposed criteria for defining the scope of TSs. Later, the "NRC Final Policy Statement on TS Improvement for Nuclear Power Reactors" (58 FR 39132) incorporated lessons learned since publication of the interim policy statement and formed the basis for a revision to 10 CFR 50.36. The "Final Rule" (60 FR 36953) codified criteria for determining the content of TSs. To facilitate the development of ITS, each reactor vendor owners group and the NRC staff developed standard TSs (STS). The NRC Committee to Review Generic Requirements reviewed the STS, made note of their safety merits, and indicated its support of conversion by operating plants to the STS. For LaSalle, the STS are NUREG-1433, Revision 1, "Standard Technical Specifications, General Electric Plants BWR/4," dated April 1995, and NUREG-1434, "Standard Technical Specifications - General Electric Plants, BWR/6," Revision 1, dated April 1995. These documents formed the basis for the LaSalle ITS conversion.

Description of the Proposed Change:

The proposed changes to the CTS are based on NUREG-1433, NUREG-1434, and guidance provided in the Final Policy Statement. Its objective is to completely rewrite, reformat, and streamline the CTS (i.e., to convert the CTS to the ITS). Emphasis is placed on human factors principles to improve clarity and understanding. The Bases section has been significantly expanded to clarify and better explain the purpose and foundation of each specification. In addition to NUREG-1433 and NUREG-1434, portions of the CTS were also used as the basis for the development of the LaSalle ITS. Plant-specific issues (unique design features, requirements, and operating practices) were discussed at length with the licensee.

The proposed changes from the CTS can be grouped into four general categories. These groupings are characterized as administrative changes, technical changes - relocations, technical changes - more restrictive, and technical changes - less restrictive. They are described as follows:

1. Administrative changes are those that involve restructuring, renumbering, rewording, interpretation, and complex rearranging of requirements and other changes not affecting technical content or substantially revising an operating requirement. The reformatting, renumbering, and rewording process reflects the attributes of NUREG-1433 and NUREG-1434, and does not involve technical changes to the existing TSs. The proposed changes include: (a) identifying plant-specific wording for system names, etc., (b) changing the wording of specification titles in the CTS to conform to STS, (c) splitting up requirements that are currently grouped, or combining requirements that are currently in separate specifications, (d) deleting specifications whose applicability has expired, and (e) wording changes that are consistent with the CTS but that more clearly or explicitly state existing requirements. Such changes are administrative in nature and do not impact initiators of analyzed events or assumed mitigation of accident or transient events.

2. Relocation changes are those involving relocation of requirements and surveillances for structures, systems, components, or variables that do not meet the criteria for inclusion in TSs. Relocated changes are those CTS requirements that do not satisfy or fall within any of the four criteria specified in the NRC's policy statement and may be relocated to appropriate licensee-controlled documents.

The licensee's application of the screening criteria to LaSalle is described in Volume 1 of Enclosure B to the March 3, 2000, submittal. The affected structures, systems, components, or variables are not assumed to be initiators of analyzed events and are not assumed to mitigate accident or transient events. The requirements and surveillances for these affected structures,

systems, components, or variables will be relocated from the TSs to administratively controlled documents such as the Updated Final Safety Analysis Report (UFSAR), the ITS Bases, or other licensee-controlled documents. Once these items have been relocated to other licensee-controlled documents, the licensee may revise them under the provisions of 10 CFR 50.59 or other NRC-approved control mechanisms, which provide appropriate procedural means to control changes by the licensee.

3. More restrictive changes are those involving more stringent requirements compared to the CTS for operation of the facility. These more stringent requirements do not result in operation that will alter assumptions relative to the mitigation of an accident or transient event. The more restrictive requirements will not alter the operation of process variables, structures, systems, and components described in the safety analyses.

4. Less restrictive changes are those where CTS requirements are relaxed, relocated or eliminated, or new plant operational flexibility is provided. The more significant "less restrictive" requirements are justified on a case-by-case basis. When requirements have been shown to provide little or no safety benefit, their removal from the TSs may be appropriate. In most cases, relaxations previously granted to individual plants on a plant-specific basis were the result of (a) generic NRC actions, (b) new NRC staff positions that have evolved from technological advancements and operating experience, or (c) resolution of the Owners Groups' comments on the Improved Standard Technical Specifications. Generic relaxations contained in NUREG-1433 and NUREG-1434 were reviewed by the staff and found to be acceptable because they are consistent with current licensing practices and NRC regulations. Each less restrictive change in the LaSalle conversion was justified by the licensee in a Discussion of Change and reviewed by the NRC staff.

In addition, there are 12 changes that are different from the requirements in the CTS, NUREG-1433, or NUREG-1434, or that are beyond the changes that are needed to meet the overall purpose of the conversion. These changes are as follows:

1. The test interval of certain surveillance requirements is changed from 18 months to 24 months to permit a longer fuel cycle. Justification for the proposed change follows the guidance of Generic Letter 91-04, "Changes in Technical Specification Surveillance Intervals to Accommodate a 24-Month Fuel Cycle," and includes a revision to the instrument setpoint methodology.
2. The requirements in CTS 4.3.7.5 are changed to allow 6 hours to perform surveillance testing of the post-accident monitoring instrumentation channels prior to entering action statements.
3. The requirements in CTS 4.3.7.4 are changed to allow 6 hours to perform surveillance testing of the remote shutdown monitoring system instrumentation channels prior to entering action statements.
4. The detailed list of the remote shutdown monitoring system instrumentation that is required to be operable (CTS 3.3.7.4) is relocated to the TRM.
5. The frequency for determining reactor coolant system leakage (CTS 4.4.3.2.1) is changed from 8 to 12 hours, which is consistent with the Generic Letter 88-01, Supplement 1, guidance to perform the surveillance once every shift, not to exceed 12 hours.
6. The requirements in CTS 4.4.3.1 are changed to allow a channel of leakage detection system to be inoperable for up to 6 hours for the performance of required surveillances provided the other leakage detection system instrumentation is operable.
7. The minimum pressure at which the automatic depressurization system is required to be operable (CTS 3.5.1) is increased from 122 psig to 150 psig.

8. The requirements (CTS 4.6.1.1) are changed to allow administrative means of verifying air lock door position in areas that are inaccessible due to high radiation or inerting.
9. The CTS 4.6.1.1 requirement that the excess flow check valves must “check flow” is changed to require that the valves “actuate to their isolation position.”
10. The required battery voltage for the 250 volt battery (CTS 4.7.3.d.1.d) is increased from 250 volts to 256 volts, which is consistent with the 2.2 volts/cell requirement for the 125-volt battery.
11. The CTS 4.8.2.3.2 requirements will be modified to allow a modified performance discharge test to be used instead of a service test or a performance discharge test, which is consistent with IEEE-450.
12. The duration of the battery charger capacity test (CTS 4.8.2.3.2.c.4) is reduced from 8 hours to 4 hours.

Environmental Impacts of the Proposed Action:

The NRC has completed its evaluation of the proposed revision to the CTS. Changes which are administrative in nature have been found to have no effect on the technical content of the TSs and are acceptable. The increased clarity and understanding these changes bring to the TSs are expected to improve the operators' control of the plant in normal and accident conditions. Relocation of requirements to other licensee-controlled documents does not change the requirements themselves nor does 10 CFR 50.36(c)(2)(ii) mandate that the TSs include these requirements. Further changes to these requirements may be made by the licensee under 10 CFR 50.59 or other NRC-approved control mechanisms that ensure continued maintenance of adequate requirements. All such relocations have been found to be in conformance with the guidelines of NUREG-1433, NUREG-1434, and the Final Policy Statement and are, therefore, acceptable.

Changes involving more restrictive requirements have been found to enhance plant safety and to be acceptable.

Changes involving less restrictive requirements have been reviewed individually. When requirements have been shown to provide little or no safety benefit or to place unnecessary burden on the licensee, their removal from the TSs was justified. In most cases, relaxations previously granted to individual plants on a plant-specific basis were the result of a generic action, or of agreements reached during discussions with the Owners Groups, and have been found to be acceptable for LaSalle. Generic relaxations contained in NUREG-1433 and NUREG-1434 have also been reviewed by the NRC staff and have been found to be acceptable.

In summary, the proposed revisions to the CTS were found to provide control of plant operations such that reasonable assurance will be provided that the health and safety of the public will be adequately protected.

These changes to the TSs will not significantly increase the probability or consequences of accidents, no changes are being made in the types of any effluents that may be released offsite, and there is no significant increase in occupational or public radiation exposure. Therefore, there are no significant radiological environmental impacts associated with the proposed amendment.

With regard to potential nonradiological impacts, the proposed amendment involves features located entirely within the restricted area as defined in 10 CFR Part 20 and does not involve any historical sites. It does not affect nonradiological plant effluents and has no other environmental impact. Therefore, there are no significant nonradiological environmental impacts associated with the proposed amendment.

Accordingly, the NRC concludes that there are no significant environmental impacts associated with the proposed action.

Alternatives to the Proposed Action:

As an alternative to the proposed action, the staff considered denial of the proposed action (i.e., the “no-action” alternative). Denial of the application would result in no change in current environmental impacts. The environmental impacts of the proposed action and the alternative action are similar.

Alternative Use of Resources:

This action does not involve the use of any resources not previously considered in the Final Environmental Statement for LaSalle, dated November 1978.

Agencies and Persons Consulted:

In accordance with its stated policy, on February 20, 2001, the NRC consulted with the Illinois State official, Mr. F. Niziolek, regarding the environmental impacts of the proposed action. The State official had no comments.

FINDING OF NO SIGNIFICANT IMPACT

On the basis of this environmental assessment, the NRC concludes that the proposed action will not have a significant effect on the quality of the human environment. Accordingly, the NRC has determined not to prepare an environmental impact statement for the proposed action.

For further details with respect to the proposed action, see the licensee's application dated March 3, 2000, as supplemented by letters dated March 24, June 5 (two letters), July 18, July 31, September 1, September 22, October 5, October 9, November 20, and December 18, 2000; and February 15, February 28, and March 7, 2001. Documents may be examined, and/or copied for a fee, at the NRC's Public Document Room, located at One White Flint North, 11555 Rockville Pike (first floor), Rockville, Maryland. Publicly available records will be accessible electronically from the ADAMS Public Library component on the NRC Web site, <http://www.nrc.gov> (the Electronic Reading Room).

Dated at Rockville, Maryland, this 21st day of March 2001.

FOR THE NUCLEAR REGULATORY COMMISSION

/RA/

Jon B. Hopkins, Senior Project Manager, Section 2
Project Directorate III
Division of Licensing Project Management
Office of Nuclear Reactor Regulation