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Exelon Nuclear

10 CFR 50.90
10 CFR 50.55a(a)(3)

RS-01-080

April 16, 2001

U.S. Nuclear Regulatory Commission
ATTN: 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 Technical Specifications Section 5.5.6, "Pre-Stressed Concrete Containment Tendon Surveillance Program," and Relief Request CR-32

In accordance with 10 CFR 50.90, "Application for amendment of license or construction permit," Exelon Generation Company (EGC), LLC, proposes changes to Appendix A, Technical Specifications (TS), of Facility Operating License Nos. NPF-11 and NPF-18. Specifically, this request is to change the reference in TS Section 5.5.6, "Pre-Stressed Concrete Containment Tendon Surveillance Program," from Regulatory Guide (RG) 1.35, "Inservice Inspection of Ungrouted Tendons in Prestresssed Concrete Containments," Revision 3, 1989, to a reference to Subsection IWL, "Requirements of Class CC Concrete Components of Light-Water Cooled Power Plants," of Section XI, "Inservice Inspection," of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel (B&PV) Code, and to delete the applicability of Surveillance Requirement (SR) 3.0.2 to TS Section 5.5.6. SR 3.0.2 allows the surveillance to be performed within 1.25 times the interval specified in the surveillance's frequency. The effected TS Bases pages are also provided for informational purposes.

The proposed TS changes are similar to TS changes recently approved for Calvert Cliffs Nuclear Power Plant on January 30, 2001.

Additionally, in accordance with 10 CFR 50.55a(a)(3), this submittal includes Relief Request CR-32, Revision 0, to allow the continued treatment of the Unit 1 and Unit 2 primary containments as "twin containments" for the scheduling of tendon liftoff force comparison testing. The treatment of the primary containments as "twin containments" was approved, in accordance with 10 CFR 50.92, "Issuance of Amendment," in Amendment No. 100 for Unit 1 and Amendment No. 84 for Unit 2 issued by NRC letter dated June 3, 1994. The relief request is required as the proposed TS changes specify that the granting of relief to requirements of TS Section 5.5.6, shall be in accordance with 10 CFR 50.55a(a)(3).

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The information supporting the proposed TS changes and relief request is subdivided as follows.

1. Attachment A gives a description and safety analysis for the proposed TS changes.
2. Attachment B includes the marked-up and retyped TS pages with the proposed changes indicated.
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.
5. Attachment E provides Relief Request CR-32.

The proposed TS 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.

EGC 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 submittal, please contact Mr. T. W. Simpkin at (603) 663-3019.

Respectfully,

R. M. Krich
Director - Licensing

Attachments:

Attachment A.	Description and Safety Analysis for the Proposed TS Changes
Attachment B.	Marked-up and Retyped TS Pages for the Proposed Changes
Attachment C.	Information Supporting a Finding of No Significant Hazards Consideration
Attachment D.	Information Supporting an Environmental Assessment
Attachment E.	Relief Request CR-32

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:	)	
EXELON GENERATION COMPANY (EGC), LLC	)	**Docket Numbers**
LASALLE COUNTY STATION - UNIT 1 and UNIT 2	)	**50-373 and 50-374**

SUBJECT: **Application for Amendment to Technical Specifications Section 5.5.6, "Pre-Stressed Concrete Containment Tendon Surveillance Program," and Relief Request CR-32**

AFFIDAVIT

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

R. M. Krich
Director - Licensing

Subscribed and sworn to before me, a Notary Public in and for the State above named, this 16th day of April, 2001

"OFFICIAL SEAL"
Timothy A. Byam
Notary Public, State of Illinois
My Commission Expires 11/24/2001

Notary Public

DESCRIPTION AND SAFETY ANALYSIS FOR PROPOSED TECHNICAL SPECIFICATION CHANGES

A. SUMMARY OF PROPOSED CHANGES

In accordance with 10 CFR 50.90, "Application for amendment of license or construction permit," Exelon Generation Company (EGC), LLC, proposes changes to Appendix A, Technical Specifications (TS), of Facility Operating License Nos. NPF-11 and NPF-18. Specifically, we propose to change the reference in TS Section 5.5.6, "Pre-Stressed Concrete Containment Tendon Surveillance Program," from Regulatory Guide (RG) 1.35, "Inservice Inspection of Ungrouted Tendons in Prestresssed Concrete Containments," Revision 3, 1989, to a reference to Subsection IWL, "Requirements of Class CC Concrete Components of Light-Water Cooled Power Plants," of Section XI, "Inservice Inspection," of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel (B&PV) Code, and to delete the applicability of Surveillance Requirement (SR) 3.0.2 to TS Section 5.5.6. SR 3.0.2 allows the surveillance to be performed within 1.25 times the interval specified in the surveillance's frequency.

The proposed changes are described in Section E of this Attachment. The marked up and retyped TS page are shown in Attachment B. The effected TS Bases pages are also provided for informational purposes, in Attachment B.

B. DESCRIPTION OF THE CURRENT REQUIREMENTS

The primary containment Tendon Surveillance Program identified in TS Section 5.5.6, provides controls for the monitoring of any tendon degradation including effectiveness of the corrosion protection medium, to ensure continued primary containment structural integrity. The Tendon Surveillance Program, inspection frequencies and acceptance criteria are in accordance with the guidance contained in RG 1.35, Revision 3, 1989, except that the Unit 1 and Unit 2 primary containments are treated as "twin containments" even though the initial structural integrity tests were not within two years of each other. Treating the primary containments as "twin containments" allows the primary containments to be tested alternately, so that the current tendon liftoff force comparison tests are performed every 10 years for each primary containment with approximately five years between the tests for the primary containments combined. The provisions of SR 3.0.2 are applicable to the Tendon Surveillance Program inspection frequencies.

C. BASES FOR THE CURRENT REQUIREMENT

The NRC in Amendment No. 100 for Unit 1 and Amendment No. 84 for Unit 2, issued by letter dated June 3, 1994, approved the use of the guidance contained RG 1.35, Revision 3, 1989, and the use of the provisions of SR 3.0.2 for the LaSalle County

Station Tendon Surveillance Program. Additionally, the NRC reviewed our request to treat the Unit 1 and Unit 2 primary containments as "twin containments" even though the initial structural integrity tests were not within two years of each other. The NRC concluded, after reviewing the Unit 1 and Unit 2 tendon test data, that the treatment of the LaSalle County Station primary containments as "twin containments" was acceptable.

D. NEED FOR REVISION OF THE REQUIREMENT

On August 8 1996, the NRC published a final rule in the Federal Register (i.e., 61 Federal Register 41303) to amend 10 CFR 50.55a, "Codes and standards," to incorporate by reference Subsection IWL of Section XI, of the ASME B&PV Code. Subsection IWL of Section XI, of the ASME B&PV Code, provides rules for the inservice inspection and repair of the reinforced concrete and post tensioning systems of Class CC components. Unit 1 and Unit 2 primary containments are Class CC components. The amended 10 CFR 50.55a required incorporation of Subsection IWL of Section XI, of the ASME B&PV Code, into inspection programs by September 9, 2001. We have developed an inspection program to implement Subsection IWL of Section XI, of the ASME B&PV Code. The proposed TS changes support this revised inspection program.

E. DESCRIPTION OF THE PROPOSED CHANGE

The proposed changes to remove the reference to RG 1.35, Revision 3, 1989, and to delete the applicability of SR 3.0.2, will remove the bolded text identified below from TS Section 5.5.6.

> "The Tendon Surveillance Program, inspection frequencies, and acceptance criteria shall be in accordance with **Regulatory Guide 1.35, Revision 3, 1989, except that the Unit 1 and Unit 2 primary containments shall be treated as twin containments even though the initial structural integrity tests were not within 2 years of each other.**
>
> The provisions of SR **3.0.2 and** 3.0.3 are applicable to the Tendon Surveillance Program inspection frequencies."

The removed text identified above from TS Section 5.5.6, will be replaced with the bolded text identified below.

> "The Tendon Surveillance Program, inspection frequencies, and acceptance criteria shall be in accordance with **Section XI, Subsection IWL of the ASME Boiler and Pressure Vessel Code and applicable addenda as required by 10**

CFR 50.55a, as amended by relief granted in accordance with 10 CFR 50.55a(a)(3).

The provisions of SR 3.0.3 are applicable to the Tendon Surveillance Program inspection frequencies."

Additionally, as noted above, the NRC in Amendment No. 100 for Unit 1 and Amendment No. 84 for Unit 2, approved the treatment of the Unit 1 and Unit 2 primary containments as "twin containments" even though the initial structural integrity tests were not performed within two years of each other. The NRC approval was granted under the provisions of 10CFR 50.90. LaSalle County Station has included in Attachment E, Relief Request CR-32, Revision 0, to allow the continued treatment of the Unit 1 and Unit 2 primary containments as "twin containments." The relief request is required as the proposed TS changes specify that the granting of relief to requirements of TS Section 5.5.6, shall be in accordance with 10 CFR 50.55a(a)(3).

F. SAFETY ANALYSIS OF THE PROPOSED CHANGE

The revised Tendon Surveillance Program, inspection frequencies, and acceptance criteria developed to implement Subsection IWL of Section XI, of the ASME B&PV Code, as required by 10 CFR 50.55a, provide acceptable requirements to perform inspections of the tendons in the LaSalle County Station, Unit 1 and Unit 2, primary containments. Thus, the proposed change to TS Section 5.5.6 will continue to ensure the integrity of the Unit 1 and Unit 2 primary containment tendons as required by the current TS.

The proposed change to TS 5.5.6, to replace the guidance contained in RG 1.35, Revision 3, 1989 with that contained in Subsection IWL of Section XI, of the ASME B&PV Code, as required by 10 CFR 50.55a, does not have a significant effect on Tendon Surveillance Program, inspection frequencies and acceptance criteria, except for the following.

- Subsection IWL of Section XI, of the ASME B&PV Code, referenced in 10 CFR 50.55a, requires that the initial structural integrity tests be performed within two years of each other for primary containments that are treated as "twin containments." Attachment E contains a relief request to allow the continued treatment of the Unit 1 and Unit 2 primary containments as "twin containments" under the provisions of 10 CFR 50.55a(a)(3).

- The extent of deviation from the scheduled inspection frequencies is addressed in Subsection IWL of Section XI, of the ASME B&PV Code, and thus the provisions of SR 3.0.2 for a schedule deviation is no longer required.

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 submittal.

H. SCHEDULE REQUIREMENTS

The amended 10 CFR 50.55a, requires incorporation of Subsection IWL of Section XI, of the ASME B&PV Code, into inspection programs by September 9, 2001. We request approval of this submittal to support implementation of the revised inspection program.

ATTACHMENT B
Proposed Technical Specification Changes for
LaSalle County Station, Units 1 and 2

MARKED-UP AND RETYPED TECHNICAL SPECIFICATION PAGES
FOR THE PROPOSED CHANGES

5.5-5
B 3.6.1.1-4
B 3.6.1.1-5

5.5 Programs and Manuals

5.5.6 Inservice Inspection Program for Post Tensioning Tendons

This program provides controls for monitoring any tendon degradation in pre-stressed concrete containments, including effectiveness of its corrosion protection medium, to ensure containment structural integrity. The program shall include baseline measurements prior to initial operations. The Tendon Surveillance Program, inspection frequencies, and acceptance criteria shall be in accordance with ~~Regulatory Guide 1.35, Revision 3, 1989, except that the Unit 1 and Unit 2 primary containments shall be treated as twin containments even though the initial structural integrity tests were not within 2 years of each other.~~

The provisions of ~~SR 3.0.2 and~~ SR 3.0.3 are applicable to the Tendon Surveillance Program inspection frequencies.

SECTION XI, SUBSECTION IWL OF THE ASME BOILER AND PRESSURE VESSEL CODE AND APPLICABLE ADDENDA AS REQUIRED BY 10 CFR 50.55a AS AMENDED BY RELIEF GRANTED IN ACCORDANCE WITH 10 CFR 50.55a(a)(3)

5.5.7 Inservice Testing Program

This program provides controls for inservice testing of ASME Code Class 1, 2, and 3 pumps and valves.

a. Testing Frequencies specified in Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda are as follows:

ASME Boiler and Pressure Vessel Code and applicable Addenda terminology for inservice testing activities	Required Frequencies for performing inservice testing activities
Weekly	At least once per 7 days
Monthly	At least once per 31 days
Quarterly or every 3 months	At least once per 92 days
Semiannually or every 6 months	At least once per 184 days
Every 9 months	At least once per 276 days
Yearly or annually	At least once per 366 days
Biennially or every 2 years	At least once per 731 days
Every 48 months	At least once per 1461 days

(continued)

5.5 Programs and Manuals

5.5.6 Inservice Inspection Program for Post Tensioning Tendons

This program provides controls for monitoring any tendon degradation in pre-stressed concrete containments, including effectiveness of its corrosion protection medium, to ensure containment structural integrity. The program shall include baseline measurements prior to initial operations. The Tendon Surveillance Program, inspection frequencies, and acceptance criteria shall be in accordance with Section XI, Subsection IWL of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10 CFR 50.55a as amended by relief granted in accordance with 10 CFR 50.55a(a)(3).

The provisions of SR 3.0.3 are applicable to the Tendon Surveillance Program inspection frequencies.

5.5.7 Inservice Testing Program

This program provides controls for inservice testing of ASME Code Class 1, 2, and 3 pumps and valves.

a. Testing Frequencies specified in Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda are as follows:

ASME Boiler and Pressure Vessel Code and applicable Addenda terminology for inservice testing activities	Required Frequencies for performing inservice testing activities
Weekly	At least once per 7 days
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Quarterly or every 3 months	At least once per 92 days
Semiannually or every 6 months	At least once per 184 days
Every 9 months	At least once per 276 days
Yearly or annually	At least once per 366 days
Biennially or every 2 years	At least once per 731 days
Every 48 months	At least once per 1461 days

(continued)

BASES (continued)

SURVEILLANCE REQUIREMENTS

SR 3.6.1.1.1

Maintaining the primary containment OPERABLE requires compliance with the visual examinations and leakage rate test requirements of the Primary Containment Leakage Rate Testing Program. Failure to meet air lock leakage testing limit (SR 3.6.1.2.1), or main steam isolation valve leakage limit (SR 3.6.1.3.10) does not necessarily result in a failure of this SR. The impact of the failure to meet these SRs must be evaluated against the Type A, B, and C acceptance criteria of the Primary Containment Leakage Rate Testing Program.

As left leakage prior to the first startup after performing a required Primary Containment Leakage Rate Testing Program leakage test is required to be $< 0.6\ L_a$ for combined Type B and C leakage, and $\leq 0.75\ L_a$ for overall Type A leakage. At all other times between required leakage rate tests, the acceptance criteria is based on an overall Type A leakage limit of $\leq 1.0\ L_a$. At $\leq 1.0\ L_a$ the offsite dose consequences are bounded by the assumptions of the safety analysis. The Frequency is required by the Primary Containment Leakage Rate Testing Program.

SR 3.6.1.1.2

10 CFR 50.55a

The structural integrity of the primary containment is ensured by the successful completion of the Inservice Inspection Program for Post Tensioning Tendons and by associated visual inspections of the steel liner and penetrations for evidence of deterioration or breach of integrity. This ensures that the structural integrity of the primary containment will be maintained in accordance with the provisions of the Inservice Inspection Program for Post Tensioning Tendons. Testing and Frequency are consistent with the recommendations of ~~Regulatory Guide 1.35~~ (Ref. 5), except that the Unit 1 and 2 primary containments shall be treated as twin containments even though the Initial Structural Integrity tests were not within two years of each other.

(continued)

BASES (continued)

SURVEILLANCE REQUIREMENTS

SR 3.6.1.1.1

Maintaining the primary containment OPERABLE requires compliance with the visual examinations and leakage rate test requirements of the Primary Containment Leakage Rate Testing Program. Failure to meet air lock leakage testing limit (SR 3.6.1.2.1), or main steam isolation valve leakage limit (SR 3.6.1.3.10) does not necessarily result in a failure of this SR. The impact of the failure to meet these SRs must be evaluated against the Type A, B, and C acceptance criteria of the Primary Containment Leakage Rate Testing Program.

As left leakage prior to the first startup after performing a required Primary Containment Leakage Rate Testing Program leakage test is required to be $< 0.6\ L_a$ for combined Type B and C leakage, and $\leq 0.75\ L_a$ for overall Type A leakage. At all other times between required leakage rate tests, the acceptance criteria is based on an overall Type A leakage limit of $\leq 1.0\ L_a$. At $\leq 1.0\ L_a$ the offsite dose consequences are bounded by the assumptions of the safety analysis. The Frequency is required by the Primary Containment Leakage Rate Testing Program.

SR 3.6.1.1.2

The structural integrity of the primary containment is ensured by the successful completion of the Inservice Inspection Program for Post Tensioning Tendons and by associated visual inspections of the steel liner and penetrations for evidence of deterioration or breach of integrity. This ensures that the structural integrity of the primary containment will be maintained in accordance with the provisions of the Inservice Inspection Program for Post Tensioning Tendons. Testing and Frequency are consistent with the recommendations of 10 CFR 50.55a (Ref. 5), except that the Unit 1 and 2 primary containments shall be treated as twin containments even though the Initial Structural Integrity tests were not within two years of each other.

(continued)

BASES

SURVEILLANCE REQUIREMENTS (continued)

SR 3.6.1.1.3

Maintaining the pressure suppression function of the primary containment requires limiting the leakage from the drywell to the suppression chamber. Thus, if an event were to occur that pressurized the drywell, the steam would be directed through the downcomers into the suppression pool. This SR measures drywell-to-suppression chamber differential pressure during a 1 hour period to ensure that the leakage paths that would bypass the suppression pool are within allowable limits.

Satisfactory performance of this SR can be achieved by establishing a known differential pressure ($\geq$ 1.5 psid) between the drywell and the suppression chamber and verifying that the measured bypass leakage is $\leq$ 10% of the acceptable $A/\sqrt{k}$ design value of 0.030 ft^2. The leakage test is performed every 24 months. The 24 month Frequency was developed considering it is prudent that this Surveillance be performed during a unit outage and also in view of the fact that component failures that might have affected this test are identified by other primary containment SRs. Two consecutive test failures, however, would indicate unexpected primary containment degradation, in this event, as the Note indicates, increasing the Frequency to once every 12 months is required until the situation is remedied as evidenced by passing two consecutive tests.

REFERENCES

1. UFSAR, Section 6.2.
2. UFSAR, Section 15.6.5.
3. 10 CFR 50, Appendix J, Option B.
4. UFSAR, Section 6.2.6.1.
5. ~~Regulatory Guide 1.35, Revision 3.~~ 10CFR 50.55a

BASES

SURVEILLANCE REQUIREMENTS (continued)

SR 3.6.1.1.3

Maintaining the pressure suppression function of the primary containment requires limiting the leakage from the drywell to the suppression chamber. Thus, if an event were to occur that pressurized the drywell, the steam would be directed through the downcomers into the suppression pool. This SR measures drywell-to-suppression chamber differential pressure during a 1 hour period to ensure that the leakage paths that would bypass the suppression pool are within allowable limits.

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REFERENCES

1. UFSAR, Section 6.2.
2. UFSAR, Section 15.6.5.
3. 10 CFR 50, Appendix J, Option B.
4. UFSAR, Section 6.2.6.1.
5. 10 CFR 50.55a.

INFORMATION SUPPORTING A FINDING OF NO SIGNIFICANT HAZARDS CONSIDERATION

Exelon Generation Company (EGC), LLC, has evaluated the proposed changes to the Technical Specifications (TS) for LaSalle County Station, Unit 1 and Unit 2, and has determined that the proposed changes do not involve a significant hazards consideration and is providing the following information to support a finding of no 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 or consequences of an accident previously evaluated;
>
> Create the possibility of a new or different kind of accident from any previously evaluated; or
>
> Involve a significant reduction in a margin of safety.

We propose to change the reference in TS Section 5.5.6, "Pre-Stressed Concrete Containment Tendon Surveillance Program," from Regulatory Guide (RG) 1.35, "Inservice Inspection of Ungrouted Tendons in Prestresssed Concrete Containments," Revision 3, 1989, to a reference to Subsection IWL, "Requirements of Class CC Concrete Components of Light-Water Cooled Power Plants," of Section XI, "Inservice Inspection," of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel (B&PV) Code, and to delete the applicability of Surveillance Requirement (SR) 3.0.2 to TS Section 5.5.6.

The information supporting the determination that the criteria set forth in 10 CFR 50.92 are met for these proposed changes is provided below.

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

> The proposed changes to Technical Specifications (TS) Section 5.5.6, "Pre-Stressed Concrete Containment Tendon Surveillance Program," change the reference in TS Section 5.5.6 from Regulatory Guide (RG) 1.35, "Inservice Inspection of Ungrouted Tendons in Prestresssed Concrete Containments," Revision 3, 1989, to a reference to Subsection IWL, "Requirements of Class CC Concrete Components of Light-Water Cooled Power Plants," of Section XI, "Inservice Inspection," of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel (B&PV) Code, and to delete the applicability of Surveillance Requirement (SR) 3.0.2 to TS Section 5.5.6. SR 3.0.2 allows the

surveillance to be performed within 1.25 times the interval specified in the surveillance's frequency. The proposed changes do not significantly effect the Tendon Surveillance Program, inspection frequencies, and acceptance criteria which provide the requirements for the performance of the primary containment tendon inspections at LaSalle County Station, Unit 1 and Unit 2.

The performance of a primary containment tendon inspection is not a precursor to any accident previously evaluated. Thus, the proposed changes to the performance of a primary containment tendon inspection do not have any effect on the probability of an accident previously evaluated.

The performance of primary containment tendon inspections does provide assurance that the primary containment will perform as designed. Thus, the radiological consequences of any accident previously evaluated are not increased.

Therefore, the proposed changes do not involve a significant increase in the probability or 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 to TS Section 5.5.6, provide assurance that the primary containment will perform as designed and do not introduce any new modes of primary containment operation or failure mechanisms.

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

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

On August 8 1996, the NRC published a final rule in the Federal Register (i.e., 61 Federal Register 41303) to amend 10 CFR 50.55a, "Codes and standards," to incorporate by reference Subsection IWL of Section XI, of the ASME B&PV Code. Subsection IWL of Section XI, of the ASME B&PV Code, provides rules for the inservice inspection and repair of the reinforced concrete and post tensioning systems of Class CC components. LaSalle County Station, Unit 1 and Unit 2, primary containments are Class CC components. The amended 10 CFR 50.55a required incorporation of Subsection IWL of Section XI, of the ASME B&PV Code, into inspection programs by September 9, 2001. We have developed an inspection program to implement Subsection IWL of Section XI, of the ASME B&PV Code. The proposed TS changes support this program.

The revised Tendon Surveillance Program, inspection frequencies, and acceptance criteria developed to implement Subsection IWL of Section XI, of the ASME B&PV Code, as required by 10 CFR 50.55a, provide acceptable requirements to perform inspections of the tendons in the LaSalle County Station, Unit 1 and Unit 2, primary containments. Thus, the proposed change to TS Section 5.5.6 will continue to ensure the integrity of the Unit 1 and Unit 2 primary containment tendons as required by the current TS.

Thus, the proposed changes do not involve a significant reduction in a margin of safety.

Therefore, based upon the above, we have concluded that the proposed changes involve no significant hazards consideration.

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

INFORMATION SUPPORTING AN ENVIRONMENTAL ASSESSMENT

Exelon Generation Company (EGC), LLC, has evaluated these proposed changes against the criteria for identification of licensing and regulatory actions requiring environmental assessment in accordance with 10 CFR 51.21, "Criteria for and identification of licensing and regulatory actions requiring environmental assessments." EGC has determined that these 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 these changes are being proposed as an amendment to a license issued pursuant to 10 CFR 50, "Domestic Licensing of Production and Utilization Facilities," that the proposed changes are to a requirement with respect to installation or use of a facility component located within the restricted area, as defined in 10 CFR 20, "Standards for Protection Against Radiation," or that changes are proposed to an inspection or a surveillance requirement, and the amendment meets the following specific criteria.

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

As demonstrated in Attachment C, these proposed changes involve no 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 to surveillance testing do not effect the types or amount of any effluent that may be released offsite. Therefore, there will be no significant change in the types, and no significant increase in the amounts of any effluents released offsite.

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

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 significant increase in individual or cumulative occupational radiation exposure resulting from these proposed changes.

RELIEF REQUEST CR-32
Revision 0

COMPONENT IDENTIFICATION

Code Class:	CC
References:	American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel (B&PV) Code, Section XI, "Inservice Inspection," 1998 Edition, Subsections IWL, "Requirements of Class CC Concrete Components of Light-Water Cooled Power Plants," Paragraphs 2421(a) and 2421(b)(2)
Examination Category:	LB
Item Numbers:	L2.10 and L2.20
Description:	Inservice Inspection Scheduling Requirements For Sites With Two Plants
Component Numbers:	All Class CC Components

CODE REQUIREMENTS

Subsection IWL-2421(a) of Section XI of the ASME B&PV Code, 1998 Edition, identifies that the test schedule for the concrete primary containments for sites with two plants, may be modified if the following are applicable;

- Both primary containments utilize the same prestressing system and are essentially identical in design,
- Post-tensioning operations for the two primary containments were completed not more than two years apart, and
- Both primary containments are similarly exposed to or protected from the outside environment.

Subsection IWL-2421(b) of Section XI, of the ASME B&PV Code, 1998 Edition, specifies the modified test schedule when the conditions of IWL-2421(a) are met.

CODE REQUIREMENT FROM WHICH RELIEF IS REQUESTED

Relief is requested from the IWL-2421(a) requirement to apply the modified test schedule of IWL-2421(b) only if post-tensioning operations for the two primary containments were completed not more than two years apart.

Additionally, relief is requested from the requirements of subparagraph IWL-2421(b)(1) for LaSalle County Station, Unit 1, to allow the Unit 1 test schedule to be based on the date of the Unit 2 Structural Integrity Test (SIT).

BASIS FOR RELIEF

Pursuant to 10 CFR 50.55a(a)(3), relief is requested from the requirements of Subsection IWL-2421 of Section XI, of the ASME B&PV Code, 1998 Edition. The basis of the relief request is that the proposed alternatives would provide an acceptable level of quality and safety.

On August 8 1996, the NRC published a final rule in the Federal Register (i.e., 61 Federal Register 41303) to amend 10 CFR 50.55a, "Codes and standards," to incorporate by reference Subsection IWL of Section XI, of the ASME B&PV Code. Subsection IWL of Section XI, of the ASME B&PV Code, provides rules for the inservice inspection (ISI) and repair of the reinforced concrete and post tensioning systems of Class CC components. Unit 1 and Unit 2 primary containments are Class CC components. The amended 10 CFR 50.55a required incorporation of Subsection IWL of Section XI, of the ASME B&PV Code, into inspection programs by September 9, 2001. LaSalle County Station has developed an inspection program to implement Subsection IWL of Section XI, of the ASME B&PV Code.

On May 8, 2000, we submitted a relief request to allow the use of the 1998 Edition of Subsection IWL of Section XI, of the ASME B&PV Code, to perform ISIs of the LaSalle County Station primary containments. On September 18, 2000, the NRC approved our request.

Subsection IWL-2421(a) of Section XI, of the ASME B&PV Code, identifies that the test schedule for the concrete primary containments for sites with two plants may be modified if the following are applicable;

- Both primary containments utilize the same prestressing system and are essentially identical in design,
- Post-tensioning operations for the two primary containments were completed not more than two years apart, and
- Both primary containments are similarly exposed to or protected from the outside environment.

LaSalle County Station, Unit 1 and Unit 2, primary containments utilize the same prestressing system, are essentially identical in design, and both primary containments are similarly exposed to or protected from the outside environment. LaSalle County Station Unit 1 post-tensioning operation was performed in July 1978 and Unit 2 post-tensioning operation was performed in December 1980 (i.e., 29 months apart). LaSalle County Station, Unit 1, initial SIT was performed in December 1978 and Unit 2 initial SIT was performed in June 1983 (i.e., 55 months apart).

The NRC in Amendment No. 100 for Unit 1 and Amendment No. 84 for Unit 2, issued by NRC letter dated June 3, 1994, approved the use of the guidance contained Regulatory Guide (RG) 1.35, "Inservice Inspection of Ungrouted Tendons in Prestresssed Concrete Containments," Revision 3, 1989, and the use of the provisions of Surveillance Requirement (SR) 3.0.2 for the LaSalle County Station Tendon Surveillance Program. SR 3.0.2 allows the surveillance to be performed within 1.25 times the interval specified in the surveillance's frequency. Additionally, the NRC reviewed our request to treat the

Unit 1 and Unit 2 primary containments as "twin containments" even though the initial SITs were not within two years of each other as described in RG 1.35. The NRC approval was based on their detailed review of data from five Unit 1 and four Unit 2 ISIs. The NRC reviewers noted that for the liftoff forces, if using the completion of construction dates as starting points for comparison, the differences between the two units are of little significance. The NRC review of this data concluded that there is reasonable agreement in the deflection values obtained during the testing at comparable locations of the primary containments and that the treatment of the LaSalle County Station, Unit 1 and Unit 2, primary containments as "twin containments" was acceptable. This relief request proposes to allow the continued treatment of the Unit 1 and Unit 2 primary containments as "twin containments." This relief request is required since alternatives to the requirements of 10 CFR 50.55a must be granted under the provisions of 10 CFR 50.55a(a)(3).

ISIs completed to date have been performed for the 1st, 3rd, 5th, 10th, and 15th year primary containment inspections for Unit 1, and the 1st, 3rd, 5th, and 15th year inspections for Unit 2. The identical Post-Tensioning Systems and primary containments of the two units have successfully met the acceptance criteria for the ISIs performed to date. The displacement recovery at each of the measured elevations of the primary containments after complete depressurization from the test was 93.5% for Unit 1 and 94.9% for Unit 2. The minimum required recovery value was 80%.

Results of these extensive ISIs performed so far clearly demonstrate that the performance of Unit 2 post-tensioning more than two years (i.e., 29 months) after Unit 1 post-tensioning is not a factor contributing to any unique condition that may subject either primary containment to a different potential for structural or tendon deterioration.

Subsection IWL-2421(b) of Section XI, of the ASME B&PV Code, 1998 Edition, specifies the modified test schedule when the conditions of IWL-2421(a) are met. The intent of IWL-2421(b) to have tendon liftoff force tests performed at approximately five year intervals is based on the "twin containments" having their SITs performed within two years of each other. However, LaSalle County Station SITs were performed nearly five years apart and this will result in the Unit 1 and Unit 2 liftoff force tests being performed on both units every 10 years. This relief request to allow the Unit 1 testing schedule to be based on the SIT date of Unit 2, will maintain the intent of Subsection IWL-2421(b) to have liftoff force test dates at a five year interval and the testing frequency that was granted in Amendment No. 100 for Unit 1 and Amendment No. 84 for Unit 2.

Therefore, this relief request is from the IWL-2421(a) requirement to apply the modified test schedule of IWL-2421(b) only if the post-tensioning operations for the two primary containments were completed not more than two years apart, and this relief request is also from the requirements of subparagraph IWL-2421(b)(1) for LaSalle County Station, Unit 1, to allow the Unit 1 test schedule to be based on the date of the Unit 2 SIT. Based on the above discussion, these relief requests will provide an acceptable level of quality and safety.

PROPOSED ALTERNATIVE PROVISIONS

The modified test schedule of IWL-2421(b) will be used for LaSalle County Station, Unit 1 and Unit 2, primary containments except that the Unit 1 test schedule will be based on the SIT date of Unit 2.

APPLICABLE TIME PERIOD

Relief is requested for the first ten-year IWL interval of the primary containment ISI program for LaSalle County Station, Unit 1 and Unit 2, ending September 9, 2008.