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10 CFR 50.90

RS-01-109

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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 Surveillance Requirements for the Suppression Chamber-Drywell Vacuum Breakers and the Drywell-to-Suppression Chamber Bypass Leakage Test

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, the proposed changes modify TS Surveillance Requirement (SR) 3.6.1.1.3 and add two new SRs, SR 3.6.1.1.4 and SR 3.6.1.1.5, covering the testing of Suppression Chamber-Drywell Vacuum Breakers. The proposed changes will decrease the frequency of the Drywell-to-Suppression Chamber bypass leakage test while maintaining the current leakage test frequency for the Suppression Chamber-Drywell Vacuum Breakers, and establish new leakage acceptance criteria for the Suppression Chamber-Drywell Vacuum Breakers when the valves are tested individually. The affected TS Bases pages are also provided for informational purposes.

The proposed TS changes are similar to TS changes approved for Susquehanna Steam Electric Station on September 6, 1996.

The information supporting the proposed TS changes 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 the 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.

A001

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
Mid-West Regional Operating Group

Attachments:

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

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

bcc: NRC Project Manager, NRR - LaSalle County Station
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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 Surveillance Requirements for the Suppression Chamber-Drywell Vacuum Breakers and the Drywell-to-Suppression Chamber Bypass Leakage Test**

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
Mid-West Regional Operating Group

Subscribed and sworn to before me, a Notary Public in and for the State above named, this 30th day of May, 2001

Notary Public

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

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, proposed changes modify TS Surveillance Requirement (SR) 3.6.1.1.3 and add two new SRs, SR 3.6.1.1.4, and SR 3.6.1.1.5, covering the testing of Suppression Chamber-Drywell Vacuum Breakers. The proposed changes will decrease the frequency of the Drywell-to-Suppression Chamber bypass leakage test while maintaining the current leakage test frequency for the Suppression Chamber-Drywell Vacuum Breakers, and establish new leakage acceptance criteria for the Suppression Chamber-Drywell Vacuum Breakers when the valves are tested individually.

The proposed changes are described in Section E of this Attachment. The marked up and retyped TS pages are shown in Attachment B.

B. DESCRIPTION OF THE CURRENT REQUIREMENTS

The Drywell-to-Suppression Chamber bypass leakage test measures the total leakage between the Drywell airspace and Suppression Chamber airspace including the leakage through the four Suppression Chamber-Drywell Vacuum Breakers. SR 3.6.1.1.3 verifies that the total Drywell-to-Suppression Chamber bypass leakage area is less than or equal to the acceptable $A/(k)^{1/2}$ design value of 0.030 square feet, at an initial differential pressure of greater than or equal to 1.5 pounds per square inch differential (psid). The SR test frequency is specified as 24 months unless two consecutive tests fail, in which case the frequency is increased to 12 months until two consecutive tests pass.

C. BASES FOR THE CURRENT REQUIREMENT

The function of the LaSalle County Station, Unit 1 and Unit 2, primary containments are to isolate and contain fission products released from the reactor Primary Coolant System (PCS) following a design basis Loss of Coolant Accident (LOCA) and to confine the postulated release of radioactive material to within limits. The primary containment incorporates a drywell section and a suppression chamber section. The drywell is located over the suppression chamber and is separated by the drywell floor. The suppression chamber contains a pool of water. The drywell floor is penetrated by downcomers, penetrations, and safety/relief valve (SRV) discharge lines. The downcomers originate in the drywell air space and terminate below the water level of the

suppression chamber pool of water. The SRV discharge lines originate at the SRVs located on the steam lines and terminate below the water level of the suppression chamber pool of water. The floor penetrations have blind flanges installed during plant operation.

The Suppression Chamber-Drywell Vacuum Breakers are vacuum relief valves that are located outside the primary containment in special piping and form an extension of the primary containment boundary. The relief valves connect the drywell airspace and suppression chamber airspace to prevent exceeding the drywell floor negative differential design pressure and backflooding of the suppression pool water into the drywell.

During a LOCA, the downcomers direct steam from the drywell airspace to below the water level of the suppression chamber pool of water to condense the steam and thus, limit the containment pressure response. Steam that enters the suppression chamber airspace directly from the drywell airspace will bypass the condensing capabilities of the suppression chamber pool of water, thereby causing a higher containment pressure response. The Drywell-to-Suppression Chamber bypass leakage test verifies that the total bypass leakage between the drywell airspace and suppression chamber airspace is consistent with accident assumptions. The containment pressure response evaluations determine the limit for the allowed bypass leakage specified in SR 3.6.1.1.3.

D. NEED FOR REVISION OF THE REQUIREMENT

The Drywell-to-Suppression Chamber bypass leakage test is conducted as an individual test or as part of the Primary Containment Leakage Rate Testing Program for Type A Test (i.e., Integrated Leakage Rate Test (ILRT)). The frequency of the Primary Containment Leakage Rate Testing Program for Type A Tests at LaSalle County Station, is in accordance with Option B, "Performance-Based Requirements," of 10 CFR 50, "Domestic Licensing of Production and Utilization Facilities," Appendix J, "Primary Reactor Containment Leakage Testing for Water-Cooled Power Reactors."

The Drywell-to-Suppression Chamber bypass leakage test is normally conducted during refueling outages and the conduct of this test requires restrictions to be placed on other outage work that is occurring simultaneously. The Suppression Chamber-Drywell Vacuum Breakers leakage test is also normally conducted during refueling outages; however, the conduct of this test does not significantly effect other outage work that is occurring simultaneously. An evaluation of the results from previous Drywell-to-Suppression Chamber bypass leakage tests has shown the amount of bypass leakage has been minimal and the proposed TS changes are consistent with our current efforts to increase outage work efficiencies.

E. DESCRIPTION OF THE PROPOSED CHANGE

The proposed TS changes modify the frequency associated with a Drywell-to-Suppression Chamber bypass leakage test in SR 3.6.1.1.3 and add two new SRs, SR 3.6.1.1.4 and SR 3.6.1.1.5, associated with the Suppression Chamber-Drywell Vacuum Breaker leakage tests.

The current frequency associated with a Drywell-to-Suppression Chamber bypass leakage test in SR 3.6.1.1.3 is 24 months or 12 months if two consecutive tests fail and continues at this frequency until two consecutive tests pass. The proposed SR change will modify the leakage test frequency to be consistent with the Primary Containment Leakage Rate Testing Program for Type A Tests or 48 months following one test failure or 24 months if two consecutive tests fail and continues at this frequency until two consecutive tests pass.

The proposed SR 3.6.1.1.4 will establish a leakage test frequency of 24 months for each Suppression Chamber-Drywell Vacuum Breaker except when the leakage test of SR 3.6.1.1.3 has been performed within 24 months (i.e., SR 3.6.1.1.4 Note). Thus, each Suppression Chamber-Drywell Vacuum Breaker will have a leak test frequency of 24 months by either SR 3.6.1.1.3 or SR 3.6.1.1.4. SR 3.6.1.1.4 specifies a leakage limit for each Suppression Chamber-Drywell Vacuum Breaker of less than or equal to 12% of the bypass leakage limit of SR 3.6.1.1.3 when a Drywell-to-Suppression Chamber bypass leakage test is not conducted.

The proposed SR 3.6.1.1.5 will establish a leakage test frequency of 24 months to determine the Suppression Chamber-Drywell Vacuum Breaker total leakage except when the leakage test of SR 3.6.1.1.3 has been performed within 24 months (i.e., SR 3.6.1.1.5 Note). Thus, the determination of Suppression Chamber-Drywell Vacuum Breaker total leakage will have a leak test frequency of 24 months by either SR 3.6.1.1.3 or SR 3.6.1.1.5. SR 3.6.1.1.5 specifies a leakage limit for Suppression Chamber-Drywell Vacuum Breaker total leakage of less than or equal to 30% of the bypass leakage limit of SR 3.6.1.1.3 when the Drywell-to-Suppression Chamber bypass leakage test is not conducted.

F. SAFETY ANALYSIS OF THE PROPOSED CHANGES

Bypass leakage between the Drywell airspace and Suppression Chamber airspace originates from three potential sources.

1. Drywell floor and floor penetrations.
2. Cross-connected piping systems.
3. Suppression Chamber-Drywell Vacuum Breakers.

Drywell Floor and Floor Penetrations

The drywell floor located between the drywell and suppression chamber is a conventional, 3 feet thick, reinforced concrete floor. It is supported on a cylindrical base at its center, on a series of concrete columns, and from the containment wall on its periphery. The drywell floor has been designed to withstand a downward differential pressure of 25 psid in combination with the normal operating, safe shutdown earthquake (SSE), and other hydrodynamic loads. The drywell floor has also been designed to accommodate an upward acting differential pressure of 5 psid, in order to account for the suppression chamber pressure increase that could occur after a LOCA.

The drywell floor structural integrity test (SIT) was performed on both units after completion of the construction of the primary containment with liner, concrete structures, all electrical and piping penetrations, equipment hatch and personnel airlock. The pressure inside the drywell was increased to 25 pounds per square inch, gauge, (psig) and held for at least one hour. Following, the satisfactory completion of the SIT, a preoperational ILRT was then performed on the primary containment (i.e., drywell and suppression chamber). The ILRT determined that the total leakage, exclusive of Main Steam Isolation Valve (MSIV) leakage, through the primary containment isolation barriers did not exceed the maximum design allowable leakage rate of 0.635% of the primary containment volume per day at the calculated peak containment internal pressure.

The Suppression Chamber is lined with a 0.25 inch stainless steel liner plate and all liner joints are full penetration welds to form a continuous steel membrane. Non-destructive tests (i.e., radiography, ultrasonic, magnetic particle and vacuum box soap bubble testing) were performed on the welds at the liner plate seams to verify acceptable quality, structural integrity and leak tightness. The drywell support columns are also provided with a stainless steel liner on the outside surfaces.

The downcomers and SRV discharge lines penetrate the drywell floor and terminate in the suppression chamber pool of water. The SRV carbon steel discharge lines and stainless steel downcomers were designed to the requirement of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel (B&PV) Code, Section III, "Rules for Construction of Nuclear Facility Components," Subsection ND, "Class 3 Components." There are 98 stainless steel downcomer pipes that project 6 inches above the drywell floor into the drywell airspace and are submerged 12 feet 4 inches below the low water level of the suppression chamber water pool, providing a flow path for uncondensed steam from the drywell airspace into the water. Each downcomer has a 23.5 inch internal diameter and its drywell opening is shielded by a 1-inch thick steel deflector plate to prevent overloading from a pipe break to that particular downcomer.

The downcomer piping in the suppression chamber airspace provides a pressure boundary between drywell airspace and suppression chamber airspace. This piping is

fabricated, erected, and inspected by nondestructive examination methods in accordance with and to the acceptance standards of the ASME Code, Section III, Subsection B, "Classs 1 Components," 1971edition including addenda through the Summer 1972 Addenda. This special construction, inspection and quality control ensures the integrity of this boundary. The design differential pressure and temperature for this boundary was established at 25 psid and 340°F.

There are 18 twelve inch diameter carbon steel zinc coated SRV discharge lines that penetrate the drywell floor and terminate below the water level of the suppression chamber water pool. Each SRV discharge line inside the drywell is equipped with two vacuum breakers, thereby preventing the possibility of siphoning the suppression chamber water. Five of the Unit 2 SRVs were permanently removed in the 1999 refueling outage. A blind flange was installed on the inlet and outlet piping, and a cap was welded to the end of the discharge lines. The current plan is to complete the same modification in Unit 1 during the scheduled 2001 refueling outage this fall.

The SRV discharge lines and downcomers, which were designed to the requirements of ASME Code Section III Class 3, did not require a fatigue analysis by the code. However, a fatigue analysis was performed since these lines are subjected to an excessive number of severe cyclic loads during normal safety relief valve actuations and a small break LOCA. A through wall crack in these lines resulting from a fatigue load could result in bypassing the pressure in the suppression pool. This could in turn result in an unacceptable over-pressurization of the primary containment. The fatigue analysis confirmed that these lines would maintain their structural integrity for all postulated loading conditions.

Additionally, there are drywell floor penetrations that have blind flanges installed during plant operation and are available to accommodate the installation of instrument cables during outages. The penetration sleeves are designed in accordance with ASME Code, Section III, Subsection NE, "Class MC Components." If a blind flange is removed, examinations will be performed on all accessible surface areas of the connection in accordance with the ASME Code, Section XI, "Inservice Inspection," Subsection IWE, "Metal Containment Components." Seals, gaskets and moisture barriers are examined for wear, damage, erosion, tears, surface cracks, physical displacement and other defects that may violate leak tightness. Pressure retaining bolting is examined for defects which may cause the bolted connection to effect the leak tightness or structural integrity. The reinstallation process for a blind flange is controlled by procedure and includes dual verification.

A comprehensive periodic visual examination program of the primary containment structure is already in place and being implemented as part of the station's Containment Inservice Inspection (CISI) Program. This CISI Program complies with the requirements stipulated in the ASME Code, Section XI, Subsections IWE and Subsection IWL, "Requirements of Class CC Concrete Components of Light-Water Cooled Power Plants." The periodic inspections are conducted three times within each ten year ISI testing

interval as required by ASME Section XI. The primary focus of these inspections is to identify defects that will jeopardize the leak tightness and structural integrity of the containment structures.

Thus, the substantial construction of the drywell floor, suppression chamber stainless steel liner plate, and drywell floor penetrations provide an effective barrier against the potential for current and future bypass leakage from the drywell airspace to the suppression chamber airspace.

Cross Connected Piping Systems

Cross connected piping systems are systems with piping in the drywell airspace and Suppression Chamber airspace that do not penetrate the drywell floor. The system piping is connected external to the primary containment. These systems are listed below.

1. Containment vent and purge lines include the nitrogen inerting /de-inerting / makeup lines (i.e., two flow paths of 26" diameter piping).
2. Drywell and suppression chamber Residual Heat Removal (RHR) System spray lines (i.e., three flow paths of 16" and 4" diameter piping).
3. Hydrogen and oxygen analyzer lines (i.e., four flow paths of 1/2" diameter piping).
4. Containment instrument gas lines (i.e., two flow paths of 1/2" diameter piping and one flow path of 1.5" diameter piping).
5. Hydrogen Recombiner lines (i.e., two flow paths of 4" and 6" diameter piping).

These cross-connected piping systems have multiple, in series containment isolation valves that are designed to meet leakage criteria specified in 10CFR50, Appendix J. Periodic local leak rate testing is performed on the valves in these systems to ensure that the valve leakage complies with 10CFR50, Appendix J leakage criteria. The leak rate testing is controlled by LaSalle County Station Procedure LTS-300-5, "Primary Containment Leak Rate Testing Program." This procedure allows a total leakage from all possible sources of approximately 231 standard cubic feet per hour (scfh). This leakage limit is approximately 5 percent of the Drywell-to-Suppression Chamber bypass leakage limit of approximately 4,470 scfh.

Thus, the testing of the cross-connected piping systems provides confidence that the bypass leakage from the drywell airspace to the suppression chamber airspace will be a small fraction of the allowed leakage.

Suppression Chamber-Drywell Vacuum Breakers

Suppression Chamber-Drywell Vacuum Breakers connect the drywell airspace and the suppression chamber airspace to prevent exceeding the 5 psid drywell floor negative design pressure and backflooding of the suppression pool water into the drywell. The

vacuum relief valves are located outside of the primary containment and form an extension of the primary containment boundary. The vacuum relief valves are mounted in special piping which connects the drywell airspace and suppression chamber airspace and are evenly distributed around the suppression chamber airspace to prevent any possibility of localized pressure gradients from occurring due to geometry. Each vacuum relief valve assembly has two, locally operated, manual butterfly valves, one on each side of the vacuum relief valve that are provided as system isolation valves should failure of the vacuum relief valve occur. Tables 3 and 6 provide the results from previous leakage tests which demonstrate that the leakage from the Suppression Chamber-Drywell Vacuum Breakers is a small percentage of the allowable Drywell-to-Suppression Chamber bypass leakage.

Thus, the Suppression Chamber-Drywell Vacuum Breakers provide an effective barrier against the potential for current and future bypass leakage from the drywell airspace to the suppression chamber airspace.

Previous Test Results

The results from previous leakage testing are shown on Tables 1 through 6. Tables 1 and 4 provide the Drywell-to-Suppression Chamber bypass leakage test results when the test was performed as an individual test. This test method provides the most accurate determination of the leakage as the configuration of the primary containment, during the test, is identical to the primary containment configuration during operation. The leakage test results demonstrate that the measured leakage has been a small percentage of the TS limit.

Tables 2 and 5 provide the Drywell-to-Suppression Chamber bypass leakage test results when the test was performed as part of the Primary Containment Leakage Rate Testing Program for Type A Tests. This test method provides an accurate determination of the leakage. However, six drywell floor penetrations are not configured identical to operation as the blind flanges are removed to allow access for ILRT instrument cables (i.e., four 2 " and two 4 " penetrations). ILRTs conducted prior to 1994 had the blind flanges removed, ILRT instrument cables routed through the penetrations and temporary material (i.e., tape) used to seal the opening. This resulted in a potentially higher measured bypass leakage then that which would occur with the blind flanges installed. The ILRT conducted in 1994 at Unit 1 (i.e., L1R06) and future Unit 1 and Unit 2 ILRTs will use a test flange to replace the blind flange. The test flange is bolted to the penetration with the ILRT instrument cables routed through a rubber seal that is fitted into the test flange. The use of the test flange will eliminate most of the additional bypass leakage during the test. The test results also demonstrate that the measured leakage has been a small percentage of the TS limit.

Tables 3 and 6 provide the Suppression Chamber-Drywell Vacuum Breakers leakage test results. These tests were performed to verify the proper function of the vacuum relief valves. The results demonstrate that the measured leakage has been small.

Conclusion

The current frequency associated with a Drywell-to-Suppression Chamber bypass leakage test in SR 3.6.1.1.3 is 24 months or 12 months if two consecutive tests fail and continues at this frequency until two consecutive tests pass. The proposed SR change will modify the leakage test frequency to be consistent with the Primary Containment Leakage Rate Testing Program for Type A Tests, or 48 months following one test failure or 24 months if two consecutive tests fail and continues at this frequency until two consecutive tests pass. The proposed change in SR 3.6.1.1.3 frequency is acceptable as the results from previous tests show that the measured Drywell-to-Suppression Chamber bypass leakage at the current TS frequency has been a small percentage of the allowable leakage. Acceptability is further demonstrated by the design of the primary containment components and other periodically performed primary containment inspections.

The proposed SR 3.6.1.1.4 will establish a leakage test frequency of 24 months for each Suppression Chamber-Drywell Vacuum Breaker except when the leakage test of SR 3.6.1.1.3 has been performed within 24 months. SR 3.6.1.1.4 specifies a leakage limit for each Suppression Chamber-Drywell Vacuum Breaker of less than or equal to 12% of the bypass leakage limit of SR 3.6.1.1.3. The proposed SR 3.6.1.1.5 will establish a total leakage limit of less than or equal to 30% of the bypass leakage limit of SR 3.6.1.1.3 when the Suppression Chamber-Drywell Vacuum Breakers are tested in accordance with SR 3.6.1.1.4. The proposed changes to establish leakage limits for the Suppression Chamber-Drywell Vacuum Breakers are acceptable as demonstrated by the results from previous Suppression Chamber-Drywell Vacuum Breaker leakage tests that show that the measured leakage has been a small percentage of the allowable leakage.

G. IMPACT ON PREVIOUS SUBMITTALS

There is no impact on any outstanding submittal from LaSalle County Station.

H. SCHEDULE REQUIREMENTS

Approval of this submittal is requested by November 1, 2001, to support the Unit 1 refueling outage scheduled for the fall of 2001.

Table 1
LaSalle County Station, Unit 1
Drywell Floor Bypass Test
Performed as Individual Test
Comparison of Measured Leakage Rate with Technical Specifications (TS) and Design Limit Values

*Test Date	Measured Leakage (scfm)	**TS (scfm)	**Design Limit (scfm)	**% of TS	**% of Design Limit
11/19/99 L1R08	1.04 scfm	74.5 scfm	745 scfm	1.40	0.14
7/11/98 L1R07	0.82 scfm	74.5 scfm	745 scfm	1.10	0.11
4/1/96	0.01 scfm	74.5 scfm	745 scfm	0	0
5/2/91 L1R04	0.0 scfm	74.5 scfm	745 scfm	0	0
7/1/88 *** L1R02	8.61 scfm	74.5 scfm	745 scfm	11.5	0.12
9/6/87	0.0 scfm	74.5 scfm	745 scfm	0	0
9/11/86 L1R01	7.2 scfm	74.5 scfm	745 scfm	9.66	0.97
3/4/84	4.92 scfm	74.5 scfm	745 scfm	6.60	0.66

* L1R0_ refers to the specific refueling outage

**These limits are based on an average suppression pool temperature of 90° F.

***7/1/88 evaluation of test results noted an inconsistent reading of one of the temperature sensors and the calculation was repreformed; the result was a decrease in the leakage rate from 8.61 scfm to 3.62 scfm. However, both results were well below the T.S. value and the 8.61 scfm was conservatively recorded as the official result.

Table 2
LaSalle County Station, Unit 1
Drywell Floor Bypass Test
Performed Concurrently With Integrated Leakage Rate Test (ILRT)
Comparison of Measured Leakage Rate with Technical Specifications (TS) and Design Limit Values

*Test Date	Measured Leakage (scfm)	**TS (scfm)	**Design Limit (scfm)	**% of TS	**% of Design Limit
6/15/94 L1R06	2.57 scfm	74.5 scfm	745 scfm	3.45	0.35
1/15/93 L1R05	9.86 scfm	74.5 scfm	745 scfm	13.23	0.13
12/24/89 L1R03	4.96 scfm	74.5 scfm	745 scfm	6.66	0.67
6/7/86 ***	23.6 scfm	74.5 scfm	745 scfm	31.68	3.17

* L1R0_ refers to the specific refueling outage

**These limits are based on an average suppression pool temperature of 90° F.

***6/7/86 when the bypass test was performed later that same outage without the ILRT instrumentation installed the result was 7.2 scfm. However, both results were well below the T.S. value and the 23.6 scfm was conservatively recorded as the official result.

Table 3
LaSalle County Station, Unit 1
Drywell To Suppression Pool Vacuum Breaker Seat Leakage Test
Comparison of Measured Leakage Rate with Technical Specifications (TS) and Design Limit Values

*Test Date		Measured Vacuum Breaker Seat Leakage (scfm)	**% of TS	**% of Design Limit
11/7/99	L1R08	0.146	0.195	0.0195
12/6/98	L1F35	0.217	0.291	0.0291
8/27/97	L1F35	0.130	0.174	0.0174
2/20/96	L1R07	0.485	0.651	0.0651
5/24/94	L1R06	0.261	0.350	0.0350
10/16/92	L1R05	0.084	0.113	0.0113
2/27/91	L1R04	0.121	0.162	0.0162
9/21/89	L1R03	0.153	0.205	0.0205

* L1R0_ refers to the specific refueling outage

**These limits are based on an average suppression pool temperature of 90° F.

Table 4
LaSalle County Station, Unit 2
Drywell Floor Bypass Test
Performed as Individual Test
Comparison of Measured Leakage Rate with Technical Specifications (TS) and Design Limit Values

*Test Date		Measured Leakage (scfm)	**TS (scfm)	**Design Limit (scfm)	**% of TS	**% of Design Limit
11/28/00	L2R08	1.51 scfm	74.5 scfm	745 scfm	2.02	0.20
4/7/99	L2R07	0.78 scfm	74.5 scfm	745 scfm	1.04	0.10
4/24/95	L2R06	2.20 scfm	74.5 scfm	745 scfm	2.95	0.30
2/4/89	L2R02	0.00 scfm	74.5 scfm	745 scfm	0	0
6/3/87	L2R01	1.34 scfm	74.5 scfm	745 scfm	1.79	0.18
6/27/85		0.66 scfm	74.5 scfm	745 scfm	0.89	0.09

* L2R0_ refers to the specific refueling outage

**These limits are based on an average suppression pool temperature of 90° F.

Table 5
LaSalle County Station, Unit 2
Drywell Floor Bypass Test
Performed Concurrently With Integrated Leakage Rate Test (ILRT)
Comparison of Measured Leakage Rate with Technical Specifications (TS) and Design Limit Values

*Test Date		Measured Leakage (scfm)	**TS (scfm)	**Design Limit (scfm)	*% of TS	*% of Design Limit
12/9/93	L2R05	18.34 scfm	74.5 scfm	745 scfm	24.6	2.46
3/29/92	L2R04	12.75 scfm	74.5 scfm	745 scfm	17.11	1.71
6/3/90	L2R03	1.97 scfm	74.5 scfm	745 scfm	2.64	0.26

* L2R0_ refers to the specific refueling outage

**These limits are based on an average suppression pool temperature of 90° F.

Table 6
LaSalle County Station, Unit 2
Drywell To Suppression Pool Vacuum Breaker Seat Leakage Test
Comparison of Measured Leakage Rate with Technical Specifications (TS) and Design Limit Values

*Test Date		Measured Vacuum Breaker Seat Leakage (scfm)	*% of TS	**% of Design Limit
11/10/00	L2R08	0.010	0.013	0.0013
1/12/99	L2R07	0.058	0.078	0.0078
3/6/95	L2R06	0.088	0.118	0.0118
9/20/93	L2R05	0.025	0.034	0.0034
3/6/92	L2R04	0.001	0.001	0.0001
3/26/90	L2R03	0.148	0.199	0.0199
1/2/87	L2R01	0.012	0.016	0.0016
1/24/84		0.015	0.020	0.0020

* L2R0_ refers to the specific refueling outage

**These limits are based on an average suppression pool temperature of 90° F.

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

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.6.1.1.1	Perform required visual examinations and leakage rate testing except for primary containment air lock testing, in accordance with the Primary Containment Leakage Rate Testing Program.	In accordance with the Primary Containment Leakage Rate Testing Program
SR 3.6.1.1.2	Verify primary containment structural integrity in accordance with the Inservice Inspection Program for Post Tensioning Tendons.	In accordance with the Inservice Inspection Program for Post Tensioning Tendons
SR 3.6.1.1.3	Verify drywell-to-suppression chamber bypass leakage is $\leq$ 10% of the acceptable ~~$A/\sqrt{k}$~~ design value of 0.030 ft^2 at an initial differential pressure of $\geq$ 1.5 psid.	24 months AND ------NOTE----- Only required after two consecutive tests fail and continues until two consecutive tests pass ---------- 12 months

INSERT A

Insert A

SR 3.6.1.1.3	Verify drywell-to-suppression chamber bypass leakage is ≤ 10% of the acceptable A/√k design value of 0.030 ft^2 at an initial differential pressure of ≥1.5 psid.	In accordance with the Primary Containment Leakage Rate Testing Program AND 48 months following a test with bypass leakage greater than the bypass leakage limit AND 24 months following 2 consecutive tests with bypass leakage greater than the bypass leakage limit until 2 consecutive tests are less than or equal to the bypass leakage limit
SR 3.6.1.1.4	----------NOTE---------- Performance of SR 3.6.1.1.3 satisfies this Surveillance. ---------- Verify individual drywell-to-suppression chamber vacuum relief valve bypass leakage is ≤ 1.2 % of the acceptable A/√k design value of 0.030 ft^2 at an initial differential pressure of ≥1.5 psid.	24 months
SR 3.6.1.1.5	----------NOTE---------- Performance of SR 3.6.1.1.3 satisfies this Surveillance. ---------- Verify total drywell-to-suppression chamber vacuum relief valve bypass leakage is ≤ 3.0 % of the acceptable A/√k design value of 0.030 ft^2 at an initial differential pressure of ≥1.5 psid.	24 months

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.

IN ACCORDANCE WITH THE FREQUENCY OF THE PRIMARY CONTAINMENT LEAKAGE RATE TESTING PROGRAM FOR TYPE A TESTS.

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~~ 24 months is required until the situation is remedied as evidenced by passing two consecutive tests.

INSERT 1

ONE TEST FAILURE INCREASES THE TEST FREQUENCY TO 48 MONTHS.

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.

Insert 1

SR 3.6.1.1.4

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 pressurizes the drywell, the steam would be directed through the downcomers into the suppression pool. This SR measures the individual drywell to suppression chamber vacuum relief valve bypass leakage 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 side and the suppression chamber side of the drywell to suppression chamber vacuum relief value and verifying that the measured bypass leakage is $\leq$ 1.2% 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.

The SR is modified by a Note stating that performance of SR 3.6.1.1.3 satisfies this Surveillance Requirement. This is acceptable since drywell to suppression chamber vacuum relief valve leakage is included in the measurement of the drywell to suppression chamber bypass leakage required by SR 3.6.1.1.3.

SR 3.6.1.1.5

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 pressurizes the drywell, the steam would be directed through the downcomers into the suppression pool. This SR determines the total drywell to suppression chamber vacuum relief valve bypass leakage 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 summing the individual drywell to suppression chamber vacuum relief valve bypass leakage from SR 3.6.1.1.4 and verifying that the measured bypass leakage is $\leq$ 3.0% of the acceptable $A/\sqrt{k}$ design value of 0.030 ft^2. The acceptable bypass leakage of this Surveillance provides a 70% margin to the acceptable bypass leakage of SR 3.6.1.1.3, to account for non-vacuum relief value sources. The Surveillance is performed every 24 months. The 24 month Frequency was developed considering it is prudent that this Surveillance be performed during a unit outage.

The SR is modified by a Note stating that performance of SR 3.6.1.1.3 satisfies this Surveillance Requirement. This is acceptable since drywell to suppression chamber vacuum relief valve leakage is included in the measurement of the drywell to suppression chamber bypass leakage required by SR 3.6.1.1.3.

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.6.1.1.1	Perform required visual examinations and leakage rate testing except for primary containment air lock testing, in accordance with the Primary Containment Leakage Rate Testing Program.	In accordance with the Primary Containment Leakage Rate Testing Program
SR 3.6.1.1.2	Verify primary containment structural integrity in accordance with the Inservice Inspection Program for Post Tensioning Tendons.	In accordance with the Inservice Inspection Program for Post Tensioning Tendons

(continued)

SURVEILLANCE		FREQUENCY
SR 3.6.1.1.3	Verify drywell-to-suppression chamber bypass leakage is $\leq$ 10% of the acceptable $A/\sqrt{k}$ design value of 0.030 ft^2 at an initial differential pressure of $\geq$ 1.5 psid.	In accordance with the Primary Containment Leakage Rate Testing Program AND 48 months following a test with bypass leakage greater than the bypass leakage limit AND 24 months following 2 consecutive tests with bypass leakage greater than the bypass leakage limit until 2 consecutive tests are less than or equal to the bypass leakage limit
SR 3.6.1.1.4	----------NOTE---------- Performance of SR 3.6.1.1.3 satisfies this Surveillance. ---------- Verify individual drywell-to-suppression chamber vacuum relief valve bypass leakage is $\leq$ 1.2% of the acceptable $A/\sqrt{k}$ design value of 0.030 ft^2 at an initial differential pressure of $\geq$ 1.5 psid.	24 months

(continued)

SURVEILLANCE		FREQUENCY
SR 3.6.1.1.5	----------NOTE---------- Performance of SR 3.6.1.1.3 satisfies this Surveillance. ----------	
	Verify total drywell-to-suppression chamber vacuum relief valve bypass leakage is $\leq$ 3.0% of the acceptable $A/\sqrt{k}$ design value of 0.030 ft^2 at an initial differential pressure of $\geq$ 1.5 psid.	24 months

BASES (continued)

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 in accordance with the Frequency of the Primary Containment Leakage Rate Testing Program for Type A Tests. The 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. One test failure increases the test Frequency to 48 months. Two consecutive test failures, however, would indicate unexpected primary containment degradation, in this event, increasing the Frequency to once every 24 months is required until the situation is remedied as evidenced by passing two consecutive tests.

SURVEILLANCE REQUIREMENTS (continued)

SR 3.6.1.1.4

Maintaining the pressure suppression function of the primary containment requires limiting the leakage form the drywell to the suppression chamber. Thus, if an event were to occur that pressurizes the drywell, the steam would be directed through the downcomers into the suppression pool. This SR measures the individual drywell to suppression chamber vacuum relief valve bypass leakage 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 side and the suppression chamber side of the drywell to suppression chamber vacuum relief valve and verifying that the measured bypass leakage is $\leq$ 1.2% of the acceptable $A/\sqrt{k}$ design value of 0.030 ft^2. The leakage test

(continued)

BASES (continued)

SURVEILLANCE REQUIREMENTS (continued)

SR 3.6.1.1.4

is performed every 24 months. The 24 month Frequency was developed considering it is prudent that this Surveillance be performed during a unit outage.

The SR is modified by a Note stating that performance of SR 3.6.1.1.3 satisfies this Surveillance Requirement. This is acceptable since drywell to suppression chamber vacuum relief valve leakage is included in the measurement of the drywell to suppression chamber bypass leakage required by SR 3.6.1.1.3.

SR 3.6.1.1.5

Maintaining the pressure suppression function of the primary containment requires limiting the leakage form the drywell to the suppression chamber. Thus, if an event were to occur that pressurizes the drywell, the steam would be directed through the downcomers into the suppression pool. This SR determines the total drywell to suppresssion chamber vacuum relief valve bypass leakage 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 summing the individual drywell to suppression chamber vacuum relief valve bypass leakage form SR 3.6.1.1.4 and verifying that the measured bypass leakage is $\leq$ 3.0% of the acceptable $A/\sqrt{k}$ design value of 0.030 ft^2. The acceptable bypass leakage of this Surveillance is performed every 24 months. The 24 month Frequency was developed considering it si prudent that this Surveillance be performed during a unit outage.

The SR is modified by a Note stating that performance of SR 3.6.1.1.3 satisfies this Surveillance Requirement. This is acceptable since drywell to suppression chamber vacuum relief valve leakage is included in the measurement of the drywell to suppression chamber bypass leakage required by SR 3.6.1.1.3.

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.

The proposed changes are to Appendix A, Technical Specifications (TS), of Facility Operating License Nos. NPF-11 and NPF-18. Specifically, the proposed changes modify TS Surveillance Requirement (SR) 3.6.1.1.3 and add two new SRs, SR 3.6.1.1.4 and SR 3.6.1.1.5. The proposed changes will decrease the frequency of the Drywell-to-Suppression Chamber bypass leakage test while maintaining the current leakage testing frequency for the Suppression Chamber-Drywell Vacuum Breakers, and establish new leakage acceptance criteria for the Suppression Chamber-Drywell Vacuum Breakers when the valves are tested individually.

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 modify Technical Specifications (TS) Surveillance Requirement (SR) 3.6.1.1.3 and add two new SRs, SR 3.6.1.1.4 and SR 3.6.1.1.5. The proposed changes will decrease the frequency for the Drywell-to-Suppression Chamber bypass leakage test while maintaining the current leakage testing frequency for the Suppression Chamber-Drywell Vacuum Breakers, and establish new leakage acceptance criteria for the Suppression Chamber-Drywell Vacuum Breakers when the valves are tested individually.
>
> The performance of a Drywell-to-Suppression Chamber bypass leakage test or Suppression Chamber-Drywell Vacuum Breaker leakage test is not a precursor

to any accident previously evaluated. Thus, the proposed changes to the performance of the leakage tests do not have any affect on the probability of an accident previously evaluated.

The performance of a Drywell-to-Suppression Chamber bypass leakage test or a Suppression Chamber-Drywell Vacuum Breaker leakage test does provide assurance that the 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 SR 3.6.1.1.3, SR 3.6.1.1.4, and SR 3.6.1.1.5 do not affect the assumed accident performance of any LaSalle County Station structure, system or component previously evaluated. The proposed changes do not introduce any new modes of system 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?

The current frequency associated with a Drywell-to-Suppression Chamber bypass leakage test in SR 3.6.1.1.3 is 24 months or 12 months if two consecutive tests fail and continues at this frequency until two consecutive tests pass. The proposed SR change will modify the leakage test frequency to be consistent with the Primary Containment Leakage Rate Testing Program for Type A Tests, or 48 months following one test failure or 24 months if two consecutive tests fail and continues at this frequency until two consecutive tests pass. The proposed change in SR 3.6.1.1.3 frequency is acceptable as the results from previous tests show that the measured Drywell-to-Suppression Chamber bypass leakage at the current TS frequency has been a small percentage of the allowable leakage. Acceptability is further demonstrated by the design requirements applied to the primary containment components and other periodically performed primary containment inspections.

The proposed SR 3.6.1.1.4 will establish a leakage test frequency of 24 months for each Suppression Chamber-Drywell Vacuum Breaker except when the leakage test of SR 3.6.1.1.3 has been performed within 24 months. SR 3.6.1.1.4 specifies a leakage limit for each Suppression Chamber-Drywell Vacuum

Breaker of less than or equal to 12% of the bypass leakage limit of SR 3.6.1.1.3. The proposed SR 3.6.1.1.5 will establish a total leakage limit of less than or equal to 30% of the bypass leakage limit of SR 3.6.1.1.3 when the Suppression Chamber-Drywell Vacuum Breakers are tested in accordance with SR 3.6.1.1.4. The proposed changes to establish leakage limits for the Suppression Chamber-Drywell Vacuum Breakers are acceptable as demonstrated by the results from previous Suppression Chamber-Drywell Vacuum Breaker leakage tests that show that the measured leakage has been a small percentage of the allowable leakage.

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. 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, 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, 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 or significant increase in the amounts of any effluent that may be 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.