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

RS-01-118

June 15, 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: Request for Amendment to Technical Specifications and
Relief Request Related to the Surveillance Requirement for the Automatic
Depressurization System Valves During Manual Actuation

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 Section 3.5.1, "ECCS – Operating," Surveillance Requirement (SR) 3.5.1.8. The proposed changes will eliminate the TS requirement that the Automatic Depressurization System (ADS) designated Safety/Relief Valves (S/RVs) open during the manual actuation of the ADS and rewords the SR frequency to require the testing of all required ADS manual actuation solenoids during the performance of SR 3.5.1.8 in place of testing on a staggered basis. The affected TS Bases pages are also provided for informational purposes.

Additionally, in accordance with 10 CFR 50.55a(a)(3), this submittal includes Relief Request RV-11, Revision 0. The relief request proposes to eliminate the American Society of Mechanical Engineers (ASME) / American National Standards Institute (ANSI), Operation and Maintenance of Nuclear Power Plants, OM-1987, Part 1, Section 3.4.1.1(d) requirement that after reinstallation, the Main Steam Line S/RVs and ADS valves open and close during manual actuation.

The proposed changes are similar to changes approved for Grand Gulf Nuclear Station, Unit 1, by NRC letter dated November 18, 1996.

Aool

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 page with the proposed changes indicated. A marked-up and retyped copy of the affected TS Bases pages is also provided for informational purposes.
3. Attachment C describes our evaluation performed using the criteria in 10 CFR 50.91, "Notice for public comment; State consultation," paragraph (a)(1) which provides information supporting a finding of no significant hazards consideration in accordance with 10 CFR 50.92, "Issuance of amendment," paragraph (c).
4. Attachment D provides information supporting an Environmental Assessment.
5. Attachment E provides Relief Request RV-11.

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 request 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 Page for the Proposed TS Changes |
| Attachment C. | Information Supporting a Finding of No Significant Hazards Consideration |
| Attachment D. | Information Supporting an Environmental Assessment |
| Attachment E. | Relief Request RV-11 |

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: Request for Amendment to Technical Specifications and Relief Request Related to the Surveillance Requirement for the Automatic Depressurization System Valves During Manual Actuation

AFFIDAVIT

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

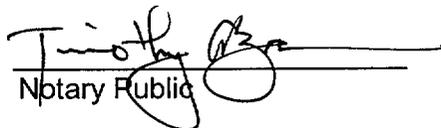
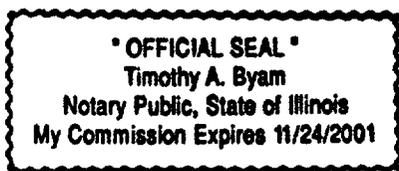


R. M. Krich
Director-Licensing
Mid-West Regional Operating Group

Subscribed and sworn to before me, a Notary Public in and

for the State above named, this 15th day of

June, 2001



Notary Public

ATTACHMENT A
Proposed Technical Specifications Changes
LaSalle County Station, Units 1 and 2
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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, the proposed changes modify TS Section 3.5.1, ECCS – Operating, "Surveillance Requirement (SR) 3.5.1.8. The proposed changes will eliminate the TS requirement that the Automatic Depressurization System (ADS) designated Safety/Relief Valves (S/RVs) open during the manual actuation of the ADS and rewords the SR frequency to require the testing of all required ADS manual actuation solenoids during the performance of SR 3.5.1.8 in place of testing on a staggered basis.

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

The proposed changes are similar to changes approved for Grand Gulf Nuclear Station, Unit 1, by NRC letter dated November 18, 1996.

B. DESCRIPTION OF THE CURRENT REQUIREMENTS

SR 3.5.1.8 verifies that during manual actuation, the required ADS valves and associated solenoids are functioning properly by observing the expected change in the indicated valve position. SR 3.5.1.8 is required to be performed at least once per 24 months on a staggered test basis for each valve solenoid.

C. BASES FOR THE CURRENT REQUIREMENT

The ADS is designed to provide depressurization of the reactor Primary Coolant System (PCS) during a small break Loss of Coolant Accident (LOCA). This becomes necessary if the High Pressure Core Spray (HPCS) System fails or is unable to maintain required water level in the Reactor Pressure Vessel (RPV). The ADS will depressurize the PCS to allow the combination of the Low Pressure Coolant Injection (LPCI) System and Low Pressure Core Spray (LPCS) System to inject into the PCS. The ADS valves can be opened automatically or remote manually. SR 3.5.1.8 verifies that the ADS valves can be manually opened. The frequency of SR 3.5.1.8 requires the testing to be performed on a staggered test basis for each valve solenoid.

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D. NEED FOR REVISION OF THE REQUIREMENT

Approximately 50% of the ADS valves are removed from the plant and setpoint tested during each refueling outage in accordance with SR 3.4.4.1. The setpoint testing program includes the manual actuation of the ADS valves during the bench testing of the valves. The ADS valves are reinstalled in the plant and SR 3.5.1.8 is performed on all of the ADS valves to manually actuate the valves with plant installed equipment.

Experience at LaSalle County Station, Unit 1 and Unit 2, and the nuclear industry has indicated that repeated manual actuation of the ADS valves can lead to undesirable seat leakage during plant operation. In the current operating cycles for Unit 1 and Unit 2, approximately 18% (i.e., 5 of 28) of the valves that experienced one open cycling developed leakage, whereas, approximately 57% (i.e., 12 of 21) of the valves that experienced more than one open cycling developed through seat leakage. The ADS valve leakage is directed to the pool of water in the primary containment suppression chamber causing a need to increase cooling to the pool of water or a plant shutdown to fix the leaking ADS valve.

The proposed changes to SR 3.5.1.8 will allow the uncoupling of the ADS valve stem from the plant installed remote manual actuation equipment prior to performing SR 3.5.1.8, thereby allowing the verification that the plant installed manual actuation equipment functions without requiring the opening of the ADS valve. The ADS valves removed each refueling outage will continue to be manually actuated during the bench testing of the valves as part of the setpoint testing program. The uncoupling of the ADS valve stem from the plant installed remote manual actuation equipment will allow increased testing of the manual actuation valve solenoids without cycling the valve.

E. DESCRIPTION OF THE PROPOSED CHANGE

The proposed TS changes to SR 3.5.1.8 will remove the requirement that the valve opens when the required ADS valves are manually actuated and replace it with the requirement that the ADS valve actuator strokes on a manual actuation. A Note is added to the SR to specify that valve actuation may be excluded. Additionally, the SR frequency is modified to 24 months without a staggered test basis for each valve solenoid.

F. SAFETY ANALYSIS OF THE PROPOSED CHANGES

LaSalle County Station, Unit 1 and Unit 2, ADS valves are Crosby Dual Function S/RVs, Model HB-65-BP, that are designed to perform as either a safety valve or as a relief valve. The safety mode of operation is independent and separate from the relief mode. Major ADS valve components are shown on the attached Figure.

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The safety mode of operation is initiated when the increasing static inlet steam pressure overcomes the restraining spring and frictional forces acting against the inlet steam pressure to move the disc in the opening direction.

The relief mode of operation is initiated when an electrical signal is received at any or all of the solenoid valves located on the pneumatic relief-mode actuator assembly. The manual actuation of the ADS valves is initiated from the control room. The solenoid and air control valve will open to allow an air source to pressurize the lower side of the piston in the pneumatic cylinder to push it upwards. This action is transmitted through a lever arm and pivot mechanism which in turn pulls the valve lifting nut upwards, thereby opening the valve to allow steam discharge through the valve. Upon deenergization of the solenoid, the air valve will reposition to allow the pressurized air in the cylinder to vent to atmosphere and thus close the valve.

The proposed changes to SR 3.5.1.8 will result in the testing of the manual actuation of the S/RVs being performed in two overlapping steps in accordance with the requirements of SR 3.4.4.1 and the proposed requirements of SR 3.5.1.8. The SR 3.4.4.1 setpoint testing of the ADS valves is performed after the valve and actuator assemblies have been removed from the plant and transported to an approved vendor. The valves are bench tested at the vendor location to verify the safety and relief mode of valve operation. The safety mode is tested by verifying the pressure required below the valve disc to open the valve is consistent with design requirements. The relief mode is tested by providing air to the valve actuator and verifying the performance of the valve actuator, lever and pivot mechanism to open the valve.

The proposed changes to SR 3.5.1.8 will require the testing of the ADS valve manual relief mode after they are installed in the plant. The testing will be performed with the actuator uncoupled from the valve stem to allow the testing of the manual actuation electrical circuitry, manual actuation solenoid and air control valve, and the actuator without causing the ADS valve to open.

Therefore, all the components necessary to manually actuate the ADS valve will continue to be tested in accordance with the requirements of SR 3.4.4.1 and the proposed requirements of SR 3.5.1.8.

Additionally, the proposed change to exclude valve actuation during SR 3.5.1.8, will allow the testing of all manual valve solenoids on a 24 month frequency instead of on a staggered basis since the object of minimizing the number of times the ADS valves are opened due to testing, is accomplished by the proposed change to the other testing requirement.

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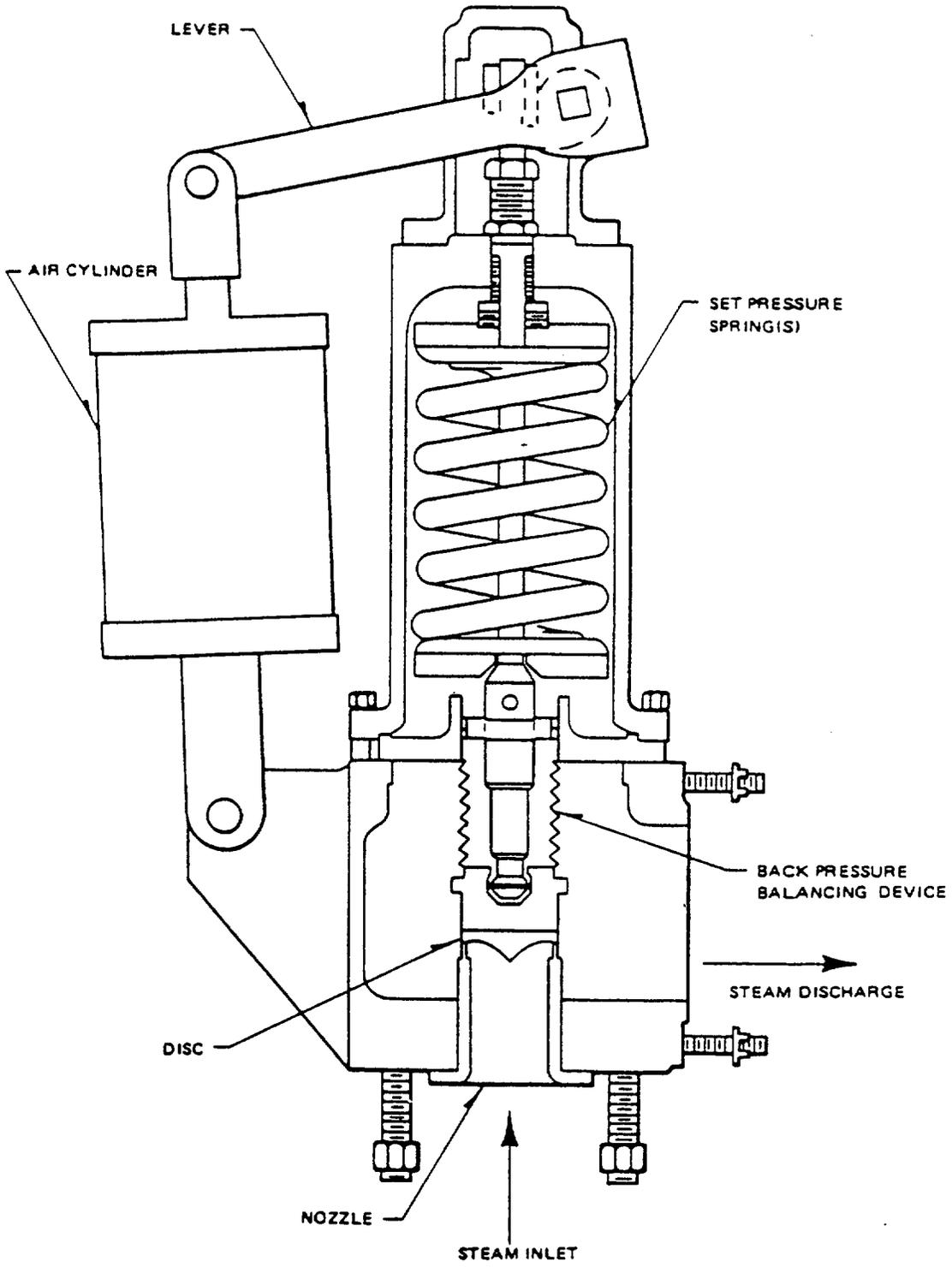
G. IMPACT ON PREVIOUS SUBMITTALS

The proposed changes have no impact on any outstanding submittal.

H. SCHEDULE REQUIREMENTS

Approval of these proposed changes is requested by November 25, 2001, to support the refueling outage scheduled for November 2001.

GRAPHIC OF SAFETY/RELIEF VALVE
WITH AUXILIARY ACTUATING DEVICE



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

MARKED-UP AND RETYPED TECHNICAL SPECIFICATIONS PAGE
FOR THE PROPOSED CHANGES

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
<p>SR 3.5.1.6 -----NOTE----- Vessel injection/spray may be excluded. -----</p> <p>Verify each ECCS injection/spray subsystem actuates on an actual or simulated automatic initiation signal.</p>	<p>24 months</p>
<p>SR 3.5.1.7 -----NOTE----- Valve actuation may be excluded. -----</p> <p>Verify the ADS actuates on an actual or simulated automatic initiation signal.</p>	<p>24 months</p>
<p>SR 3.5.1.8 Verify each required ADS valve opens when manually actuated.</p>	<p>24 months on a STAGGERED TEST BASIS for each valve solenoid</p>

ACTUATOR STROKES

NOTE
VALVE ACTUATION MAY BE EXCLUDED

BASES

SURVEILLANCE
REQUIREMENTS

SR 3.5.1.6 (continued)

This SR is modified by a Note that excludes vessel injection/spray during the Surveillance. Since all active components are testable and full flow can be demonstrated by recirculation through the test line, coolant injection into the RPV is not required during the Surveillance.

SR 3.5.1.7

The ADS designated S/RVs are required to actuate automatically upon receipt of specific initiation signals. A system functional test is performed to demonstrate that the mechanical portions of the ADS function (i.e., solenoids) operate as designed when initiated either by an actual or simulated initiation signal, causing proper actuation of all the required components. SR 3.5.1.8 and the LOGIC SYSTEM FUNCTIONAL TEST performed in LCO 3.3.5.1 overlap this Surveillance to provide complete testing of the assumed safety function.

The 24 month Frequency is based on the need to perform this Surveillance under the conditions that apply during a plant outage and the potential for an unplanned transient if the Surveillance were performed with the reactor at power. Operating experience has shown that these components usually pass the SR when performed at the 24 month Frequency, which is based on the refueling cycle. Therefore, the Frequency was concluded to be acceptable from a reliability standpoint.

This SR is modified by a Note that excludes valve actuation since the valves are individually tested in accordance with SR 3.5.1.8. This also prevents an RPV pressure blowdown.

SR 3.5.1.8

INSERT
A

~~A manual actuation of each required ADS valve, and observing the expected change in the indicated valve position, is performed to verify that the valve and solenoids are functioning properly. SR 3.5.1.7 and the LOGIC SYSTEM FUNCTIONAL TEST performed in LCO 3.3.5.1 overlap this Surveillance to provide complete testing of the assumed safety function.~~

(continued)

BASES

SURVEILLANCE
REQUIREMENTS

SR 3.5.1.8 (continued)

The Frequency of 24 months ~~on a STAGGERED TEST BASIS ensures that both solenoids for each required ADS valve are alternately tested.~~ The Frequency is based on the need to perform this Surveillance under the conditions that apply just prior to or during a startup from a plant outage. Operating experience has shown that these components usually pass the SR when performed at the 24 month Frequency, which is based on the refueling cycle. Therefore, the Frequency was concluded to be acceptable from a reliability standpoint.

INSERT
B

REFERENCES

1. UFSAR, Section 6.3.2.2.3.
2. UFSAR, Section 6.3.2.2.4.
3. UFSAR, Section 6.3.2.2.1.
4. UFSAR, Section 6.3.2.2.2.
5. UFSAR, Section 15.2.8.
6. UFSAR, Section 15.6.4.
7. UFSAR, Section 15.6.5.
8. 10 CFR 50, Appendix K.
9. UFSAR, Section 6.3.3.
10. 10 CFR 50.46.
11. UFSAR, Section 6.3.3.3.
12. Memorandum from R.L. Baer (NRC) to V. Stello, Jr. (NRC), "Recommended Interim Revisions to LCO's for ECCS Components," December 1, 1975.
13. UFSAR, Section 7.3.1.2.

BASES

ACTIONS A.1 and A.2 (continued)

a MODE in which the LCO does not apply. To achieve this status, the plant must be brought to at least MODE 3 within 12 hours and to MODE 4 within 36 hours. The allowed Completion Times are reasonable, based on operating experience, to reach the required plant conditions from full power conditions in an orderly manner and without challenging plant systems.

SURVEILLANCE REQUIREMENTS SR 3.4.4.1

This Surveillance demonstrates that the required S/RVs will open at the pressures assumed in the safety analysis of Reference 2. The demonstration of the S/RV safety function lift settings must be performed during shutdown, since this is a bench test, and in accordance with the Inservice Testing Program. The lift setting pressure shall correspond to ambient conditions of the valves at nominal operating temperatures and pressures. The S/RV setpoint is $\pm 3\%$ for OPERABILITY; however, the valves are reset to $\pm 1\%$ during the Surveillance to allow for drift. A Note is provided to allow up to two of the required 17 S/RVs for Unit 1 and 12 S/RVs for Unit 2 to be physically replaced with S/RVs with lower setpoints. This provides operational flexibility which maintains the assumptions in the overpressure protection analysis.

INSERT
C

The Frequency is specified in the Inservice Testing Program which requires the valves be subjected to a bench test during refueling outages. The Frequency is acceptable based on industry standards and operating history.

- REFERENCES
1. ASME, Boiler and Pressure Vessel Code, Section III.
 2. UFSAR, Section 5.2.2.1.3.
 3. UFSAR, Chapter 15.
-

Insert A

A manual actuation of each required ADS actuator is performed to verify that the valve, actuator, and solenoids are functioning properly. SR 3.4.4.1, SR 3.5.1.7 and the LOGIC SYSTEM FUNCTIONAL TEST of LCO 3.3.5.1 overlap this surveillance to provide complete testing of the assumed safety function.

Insert B

This SR is modified by a Note that excludes the valve actuation since valve OPERABILITY is demonstrated for ADS valves by successful operation of a sample of S/RVs. The sample population of S/RVs tested each refueling outage to satisfy SR 3.4.4.1 are stroked in the relief mode during "as found" testing to verify proper operation of the ADS valve. The successful performance of the test sample of S/RVs provides reasonable assurance that all ADS valves will perform in a similar fashion. Additionally, after the S/RVs are replaced, the relief mode actuator of the newly installed S/RVs are uncoupled from the S/RV stem and cycled to ensure that no damage has occurred during transportation and installation. This verifies that each replaced S/RV will properly perform its intended safety function.

Insert C

Additionally, during the performance of this Surveillance, the S/RV will be manually actuated by providing air to the valve actuator to verify the performance of the valve actuator, lever and pivot mechanism to open the valve.

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
<p>SR 3.5.1.6 -----NOTE----- Vessel injection/spray may be excluded. ----- Verify each ECCS injection/spray subsystem actuates on an actual or simulated automatic initiation signal.</p>	<p>24 months</p>
<p>SR 3.5.1.7 -----NOTE----- Valve actuation may be excluded. ----- Verify the ADS actuates on an actual or simulated automatic initiation signal.</p>	<p>24 months</p>
<p>SR 3.5.1.8 -----NOTE----- Valve actuation may be excluded. ----- Verify each required ADS valve actuator strokes when manually actuated.</p>	<p>24 months</p>

BASES

SURVEILLANCE
REQUIREMENTS

SR 3.5.1.6 (continued)

This SR is modified by a Note that excludes vessel injection/spray during the Surveillance. Since all active components are testable and full flow can be demonstrated by recirculation through the test line, coolant injection into the RPV is not required during the Surveillance.

SR 3.5.1.7

The ADS designated S/RVs are required to actuate automatically upon receipt of specific initiation signals. A system functional test is performed to demonstrate that the mechanical portions of the ADS function (i.e., solenoids) operate as designed when initiated either by an actual or simulated initiation signal, causing proper actuation of all the required components. SR 3.5.1.8 and the LOGIC SYSTEM FUNCTIONAL TEST performed in LCO 3.3.5.1 overlap this Surveillance to provide complete testing of the assumed safety function.

The 24 month Frequency is based on the need to perform this Surveillance under the conditions that apply during a plant outage and the potential for an unplanned transient if the Surveillance were performed with the reactor at power. Operating experience has shown that these components usually pass the SR when performed at the 24 month Frequency, which is based on the refueling cycle. Therefore, the Frequency was concluded to be acceptable from a reliability standpoint.

This SR is modified by a Note that excludes valve actuation since the valves are individually tested in accordance with SR 3.5.1.8. This also prevents an RPV pressure blowdown.

SR 3.5.1.8

A manual actuation of each required ADS actuator is performed to verify that the valve, actuator, and solenoids are functioning properly. SR 3.4.4.1, SR 3.5.1.7 and the LOGIC SYSTEM FUNCTIONAL TEST performed in LCO 3.3.5.1 overlap this Surveillance to provide complete testing of the assumed safety function.

(continued)

BASES

SURVEILLANCE
REQUIREMENTS

SR 3.5.1.8 (continued)

The Frequency of 24 months is based on the need to perform this Surveillance under the conditions that apply just prior to or during a startup from a plant outage. Operating experience has shown that these components usually pass the SR when performed at the 24 month Frequency, which is based on the refueling cycle. Therefore, the Frequency was concluded to be acceptable from a reliability standpoint.

This SR is modified by a Note that excludes the valve actuation since valve OPERABILITY is demonstrated for ADS valves by successful operation of a sample of S/RVs. The sample population of S/RVs tested each refueling outage to satisfy SR 3.4.4.1 are stroked in the relief mode during "as found" testing to verify proper operation of the ADS valve. The successful performance of the test sample of S/RVs provides reasonable assurance that all ADS vales will perform in a similar fashion. Additionally, after the S/RVs are replaced, the relief mode actuator of the newly installed S/RVs are uncoupled from the S/RV stem and cycled to ensure that no damage has occurred during transportation and installation. This verifies that each replaced S/RV will properly perform its intended safety function.

REFERENCES

1. UFSAR, Section 6.3.2.2.3.
2. UFSAR, Section 6.3.2.2.4.
3. UFSAR, Section 6.3.2.2.1.
4. UFSAR, Section 6.3.2.2.2.
5. UFSAR, Section 15.2.8.
6. UFSAR, Section 15.6.4.
7. UFSAR, Section 15.6.5.
8. 10 CFR 50, Appendix K.
9. UFSAR, Section 6.3.3.
10. 10 CFR 50.46.
11. UFSAR, Section 6.3.3.3.

(continued)

BASES

REFERENCES

- (continued)
12. Memorandum from R.L. Baer (NRC) to V. Stello, Jr. (NRC), "Recommended Interim Revisions to LCO's for ECCS Components," December 1, 1975.
 13. UFSAR, Section 7.3.1.2.
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BASES

ACTIONS A.1 and A.2 (continued)

a MODE in which the LCO does not apply. To achieve this status, the plant must be brought to at least MODE 3 within 12 hours and to MODE 4 within 36 hours. The allowed Completion Times are reasonable, based on operating experience, to reach the required plant conditions from full power conditions in an orderly manner and without challenging plant systems.

SURVEILLANCE REQUIREMENTS SR 3.4.4.1

This Surveillance demonstrates that the required S/RVs will open at the pressures assumed in the safety analysis of Reference 2. The demonstration of the S/RV safety function lift settings must be performed during shutdown, since this is a bench test, and in accordance with the Inservice Testing Program. The lift setting pressure shall correspond to ambient conditions of the valves at nominal operating temperatures and pressures. The S/RV setpoint is $\pm 3\%$ for OPERABILITY; however, the valves are reset to $\pm 1\%$ during the Surveillance to allow for drift. Additionally, during the performance of this Surveillance, the S/RV will be manually actuated by providing air to the valve actuator to verify the performance of the valve actuator, lever and pivot mechanism to open the valve. A Note is provided to allow up to two of the required 17 S/RVs for Unit 1 and 12 S/RVs for Unit 2 to be physically replaced with S/RVs with lower setpoints. This provides operational flexibility which maintains the assumptions in the overpressure protection analysis.

The Frequency is specified in the Inservice Testing Program which requires the valves be subjected to a bench test during refueling outages. The Frequency is acceptable based on industry standards and operating history.

- REFERENCES
1. ASME, Boiler and Pressure Vessel Code, Section III.
 2. UFSAR, Section 5.2.2.1.3.
 3. UFSAR, Chapter 15.
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ATTACHMENT C
Proposed Technical Specifications Changes
LaSalle County Station, Units 1 and 2
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**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 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 Section 3.5.1, "ECCS – Operating," Surveillance Requirement (SR) 3.5.1.8. The proposed changes will eliminate the TS requirement that the Automatic Depressurization System (ADS) designated Safety/Relief Valves (S/RVs) open during the manual actuation of the ADS and rewords the SR frequency to require the testing of all required ADS manual actuation solenoids during the performance of SR 3.5.1.8 in place of testing on a staggered basis.

The information supporting the determination that the criteria set forth in 10 CFR 50.92 are met for the 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) Section 3.5.1, "ECCS – Operating," Surveillance Requirement (SR) 3.5.1.8. The proposed changes will eliminate the TS requirement that the Automatic Depressurization System (ADS) designated Safety/Relief Valves (S/RVs) open during the manual actuation of the ADS and rewords the SR frequency to require the testing of all required ADS manual actuation solenoids during the performance of SR 3.5.1.8 in place of testing on a staggered basis. The performance of ADS valve testing is not a precursor to any accident previously evaluated and does not change the manner in which the ADS is operated. Thus, the proposed changes to the performance of SR 3.5.1.8 do not have any affect on the probability of an accident previously evaluated.

ATTACHMENT C
Proposed Technical Specifications Changes
LaSalle County Station, Units 1 and 2
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The testing provides assurance that the ADS will function as designed when actuated to depressurize the Primary Coolant System (PCS). The proposed changes to the surveillance requirements provide the same level of assurance regarding ADS reliability as the previous surveillance requirements. Accordingly, the consequences of an accident previously evaluated where the ADS was credited with mitigation is unchanged.

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 3.5.1.8 do not affect the performance of any LaSalle County Station structure, system or component credited with mitigating any accident previously evaluated since the proposed changes will provide the same level of confidence concerning the functioning of the ADS as the current requirements. Furthermore, the proposed changes do not install any new equipment, 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 proposed changes to SR 3.5.1.8 will allow the uncoupling of the ADS valve lever from the other components associated with the manual actuation of the ADS valve. The proposed changes will allow the testing of the manual actuation electrical circuitry, manual actuation solenoid and air control valve, and the actuator without causing the ADS valve to open. The ADS valves will continue to be manually actuated by the bench-test valve control system of the setpoint testing program. The proposed changes do not affect the valve setpoint or the operational criteria that directs the ADS valves to be manually opened during plant transients.

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

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

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

INFORMATION SUPPORTING AN ENVIRONMENTAL ASSESSMENT

Exelon Generation Company (EGC), LLC, has evaluated this 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 the 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 the 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 proposed changes 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.

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Valve Relief Request - RV-11
(Rev. 0)

COMPONENT IDENTIFICATION

Code Class: Class 1

Reference: American Society of Mechanical Engineers (ASME) /
American National Standards Institute (ANSI), Operation and
Maintenance of Nuclear Power Plants, OM-1987, Part 1
(OM-1)

Examination Category: C

Description: Main steam pressure relief valves with auxiliary actuating
devices that are maintained or refurbished in place, removed
for maintenance and testing, or both, and reinstalled shall be
remotely actuated to verify open and close capability of the
valve prior to resumption of electric power generation.

Affected Components: Equipment Plant

<u>Number</u>	<u>Description</u>
1B21-F013A*	Main Steam Line Safety Relief Valve
1B21-F013B*	Main Steam Line Safety Relief Valve
1B21-F013G*	Main Steam Line Safety Relief Valve
1B21-F013J*	Main Steam Line Safety Relief Valve
1B21-F013N*	Main Steam Line Safety Relief Valve
1(2)B21-F013C	Main Steam Line Safety Relief Valve w/ADS Function
1(2)B21-F013D	Main Steam Line Safety Relief Valve w/ADS Function
1(2)B21-F013E	Main Steam Line Safety Relief Valve w/ADS Function
1(2)B21-F013F	Main Steam Line Safety Relief Valve
1(2)B21-F013G	Main Steam Line Safety Relief Valve
1(2)B21-F013H	Main Steam Line Safety Relief Valve
1(2)B21-F013J	Main Steam Line Safety Relief Valve
1(2)B21-F013K	Main Steam Line Safety Relief Valve
1(2)B21-F013L	Main Steam Line Safety Relief Valve
1(2)B21-F013M	Main Steam Line Safety Relief Valve
1(2)B21-F013N	Main Steam Line Safety Relief Valve
1(2)B21-F013P	Main Steam Line Safety Relief Valve
1(2)B21-F013R	Main Steam Line Safety Relief Valve w/ADS Function
1(2)B21-F013S	Main Steam Line Safety Relief Valve w/ADS Function
1(2)B21-F013U	Main Steam Line Safety Relief Valve w/ADS Function
1(2)B21-F013V	Main Steam Line Safety Relief Valve w/ADS Function

* Unit 2 A/B/G/J/N valves were permanently removed by Design Change Package 9600382. Unit 1 A/B/G/J/N valves are pending permanent removal during the 2001 refueling outage by Design Change Package 9600007.

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CODE REQUIREMENTS

OM-1, Section 3.4.1.1(d) requires that each valve that has been maintained or refurbished in place, removed for maintenance and testing, or both, and reinstalled shall be remotely actuated at reduced system pressure to verify open and close capability of the valve prior to resumption of electric power generation for main steam pressure relief valves with auxiliary actuating devices.

CODE REQUIREMENT FROM WHICH RELIEF IS REQUESTED

Relief is requested from the OM-1, Section 3.4.1.1(d) requirement that after installation, the remote actuation of main steam pressure relief valves with auxiliary actuating devices shall include the opening and closing of the valve.

BASIS FOR RELIEF

Pursuant to 10 CFR 50.55a(a)(3), relief is requested from the requirement of OM-1, Section 3.4.1.1(d). The basis of the relief request is that the proposed alternative would provide an acceptable level of quality and safety.

Currently, approximately 50% of the Safety/Relief Valves (S/RVs) and Automatic Depressurization System (ADS) designated S/RVs are removed from the plant and setpoint tested during each refueling outage. The setpoint testing program includes the manual actuation of the ADS valves by the bench-test valve control system. The valves, after re-installation in the plant, are actuated a second time by the plant installed remote manual actuation equipment.

Experience at LaSalle County Station, Unit 1 and Unit 2, and the nuclear industry has indicated that repeated manual actuation of the S/RVs and ADS valves can lead to valve through seat leakage during plant operation. In the current operating cycles for Unit 1 and Unit 2, approximately 18% (i.e., 5 of 28) of the valves that experienced one open cycling developed leakage, whereas, approximately 57% (i.e., 12 of 21) of the valves that experienced more than one open cycling developed through seat leakage. The S/RV and ADS valve leakage is directed to the pool of water in the primary containment suppression chamber causing a need to increase cooling to the pool of water or a plant shutdown to fix the leaking valve.

The relief request will allow the testing of the S/RV and ADS valves to be performed in two separate steps. The manual actuation of the valves by the bench-test valve control system of the setpoint testing program, will verify the opening and closing of the valve with the actuator coupled to the valve stem. The plant installed manual actuation equipment will be tested after valve installation in the plant and with the valve stem uncoupled from the actuator. This will allow the testing of the plant installed manual actuation electrical circuitry, manual actuation solenoid and air control valve, and the actuator without causing the valve to open. Therefore, all the components of the S/RV and ADS will continue to be tested.

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This uncoupled actuator test will also be performed following any maintenance activity that could affect the relief mode of the associated S/RV or ADS valves.

The NRC in NUREG-1482, " Guidelines for Inservice Testing at Nuclear Power Plants, and NUREG-0626, " Generic Evaluation of Feedwater Transients and Small Break Loss-of-Coolant Accidents in GE-Designed Operating Plants and Near-Term Operating License Applications," also recommended reducing the number of challenges to the ADS valves.

PROPOSED ALTERNATIVE PROVISIONS

The remote actuation of the S/RV and ADS valves shall be performed in two separate steps. The manual actuation of the valves by the bench-test valve control system of the setpoint testing program, will verify the opening and closing of the valve with the actuator coupled to the valve stem. The plant installed manual actuation equipment will be tested after valve installation in the plant and with the valve stem uncoupled from the actuator.

APPLICABLE TIME PERIODS

Relief is requested for the remainder of the second and third 10 year interval.