

September 1, 1993

Docket Nos. 50-373  
and 50-374

Mr. D. L. Farrar  
Manager, Nuclear Regulatory Services  
Commonwealth Edison Company  
Executive Towers West III, Suite 500  
1400 OPUS Place  
Downers Grove, Illinois 60515

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NRC & Local PDRs	Docket File
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PDIII-2 p/f	B. Clayton RIII
J. Norberg	R. Laufer

Dear Mr. Farrar:

SUBJECT: ISSUANCE OF AMENDMENTS (TAC NOS. M85920 AND M85921)

The Commission has issued the enclosed Amendment No. 91 to Facility Operating License No. NPF-11 and Amendment No. 75 to Facility Operating License No. NPF-18 for the LaSalle County Station, Units 1 and 2, respectively. The amendments are in response to your application dated March 2, 1993.

The amendments change the Snubber Visual Inspection Intervals and Corrective Actions in Technical Specification (TS) surveillance requirements 4.7.9.b and 4.7.9.c to the alternative requirements provided in Generic Letter 90-09, "Alternative Visual Inspection Intervals and Corrective Actions." The associated TS Bases were also modified to reflect the TS change. Additionally, minor changes were made to TS 4.7.9.e to remove a reference to the first refueling outage and a footnote referencing Cycle 2.

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

Sincerely,

Original Signed By:

Janet L. Kennedy, Project Manager  
Project Directorate III-2  
Division of Reactor Projects - III/IV/V  
Office of Nuclear Reactor Regulation

Enclosures:

1. Amendment No. 91 to NPF-11
2. Amendment No. 75 to NPF-18
3. Safety Evaluation

cc w/enclosures:  
See next page

**NRC FILE CENTER COPY**

OFC	LA:PDIII-2	PM:PDIII-2	D:PDIII-2	OGC NLO
NAME	CMOORE	JKENNEDY	JDYER	MROBER
DATE	8/13/93	8/13/93	8/15/93	9/1/93

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PDR ADOCK 05000373  
P PDR

one minor  
change

FEOL  
1/1

September 1, 93

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

Sincerely,

**Original Signed By:**

Janet L. Kennedy, Project Manager  
Project Directorate III-2  
Division of Reactor Projects - III/IV/V  
Office of Nuclear Reactor Regulation

Enclosures:

1. Amendment No. 91 to NPF-11
2. Amendment No. 75 to NPF-18
3. Safety Evaluation

cc w/enclosures:  
See next page

OFC	LA:PDIII-2	PM:PDIII-2	D:PDIII-2	OGC NZO
NAME	CMOORE	JKENNEDY -K	JDYER JIM	MZOBARA [Signature]
DATE	8/13/93	8/13/93	8/15/93	9/10/93

1  
one minor  
change



UNITED STATES  
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

September 1, 1993

Docket Nos. 50-373  
and 50-374

Mr. D. L. Farrar  
Manager, Nuclear Regulatory Services  
Commonwealth Edison Company  
Executive Towers West III, Suite 500  
1400 OPUS Place  
Downers Grove, Illinois 60515

Dear Mr. Farrar:

SUBJECT: ISSUANCE OF AMENDMENTS (TAC NOS. M85920 AND M85921)

The Commission has issued the enclosed Amendment No. 91 to Facility Operating License No. NPF-11 and Amendment No. 75 to Facility Operating License No. NPF-18 for the LaSalle County Station, Units 1 and 2, respectively. The amendments are in response to your application dated March 2, 1993.

The amendments change the Snubber Visual Inspection Intervals and Corrective Actions in Technical Specification (TS) surveillance requirements 4.7.9.b and 4.7.9.c to the alternative requirements provided in Generic Letter 90-09, "Alternative Visual Inspection Intervals and Corrective Actions." The associated TS Bases were also modified to reflect the TS change. Additionally, minor changes were made to TS 4.7.9.e to remove a reference to the first refueling outage and a footnote referencing Cycle 2.

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

Sincerely,

A handwritten signature in cursive script that reads "Janet L. Kennedy".

Janet L. Kennedy, Project Manager  
Project Directorate III-2  
Division of Reactor Projects - III/IV/V  
Office of Nuclear Reactor Regulation

Enclosures:

1. Amendment No. 91 to NPF-11
2. Amendment No. 75 to NPF-18
3. Safety Evaluation

cc w/enclosures:  
See next page

Mr. D. L. Farrar  
Commonwealth Edison Company

LaSalle County Station  
Unit Nos. 1 and 2

cc:

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Assistant Attorney General  
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Suite 11-300  
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UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

COMMONWEALTH EDISON COMPANY

DOCKET NO. 50-373

LASALLE COUNTY STATION, UNIT 1

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 91  
License No. NPF-11

1. The Nuclear Regulatory Commission (the Commission) has found that:
  - A. The application for amendment filed by the Commonwealth Edison Company (the licensee), dated March 2, 1993, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's regulations set forth in 10 CFR Chapter I;
  - B. The facility will operate in conformity with the application, the provisions of the Act, and the regulations of the Commission;
  - C. There is reasonable assurance: (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations set forth in 10 CFR Chapter I;
  - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
  - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the enclosure to this license amendment and paragraph 2.C.(2) of the Facility Operating License No. NPF-11 is hereby amended to read as follows:

(2) Technical Specifications and Environmental Protection Plan

The Technical Specifications contained in Appendix A, as revised through Amendment No. 91, and the Environmental Protection Plan contained in Appendix B, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. This amendment is effective upon date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

*for William M. Smith*  
James E. Dyer, Director  
Project Directorate III-2  
Division of Reactor Projects - III/IV/V  
Office of Nuclear Reactor Regulation

Attachment:  
Changes to the Technical  
Specifications

Date of Issuance: September 1, 1993

ATTACHMENT TO LICENSE AMENDMENT NO. 91

FACILITY OPERATING LICENSE NO. NPF-11

DOCKET NO. 50-373

Replace the following pages of the Appendix "A" Technical Specifications with the enclosed pages. The revised pages are identified by amendment number and contain a vertical line indicating the area of change.

REMOVE

INSERT

XXIII

XXIII

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## PLANT SYSTEMS

### 3/4.7.9 SNUBBERS

#### LIMITING CONDITION FOR OPERATION

---

3.7.9 All hydraulic and mechanical snubbers shall be OPERABLE.

APPLICABILITY: OPERATIONAL CONDITIONS 1, 2, and 3. OPERATIONAL CONDITIONS 4 and 5 for snubbers located on systems required OPERABLE in those OPERATIONAL CONDITIONS.

#### ACTION:

With one or more snubbers inoperable, on any system, within 72 hours replace or restore the inoperable snubber(s) to OPERABLE status and perform an engineering evaluation per Specification 4.7.9g. on the attached component or declare the attached system inoperable and follow the appropriate ACTION statement for that system.

#### SURVEILLANCE REQUIREMENTS

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4.7.9 Each snubber shall be demonstrated OPERABLE by performance of the following augmented inservice inspection program and the requirements of Specification 4.0.5.

a. Inspection Types

As used in this specification, "type of snubber" shall mean snubbers of the same design and manufacturer, irrespective of capacity.

b. Visual Inspections

Snubbers are categorized as inaccessible or accessible during reactor operation. Each of these categories (inaccessible and accessible) may be inspected independently according to the schedule determined by Table 4.7.9-1. The visual inspection interval for each type of snubber shall be determined based upon the criteria provided in Table 4.7.9-1 and the first inspection interval determined using this criteria shall be based upon the previous inspection interval as established by the requirements in effect before amendment 91.

c. Visual Inspection Acceptance Criteria

Visual inspections shall verify that (1) the snubber has no visible indications of damage or impaired OPERABILITY, (2) attachments to the foundation or supporting structure are functional, and

## PLANT SYSTEMS

### SURVEILLANCE REQUIREMENTS (Continued)

(3) fasteners for the attachment of the snubber to the component and to the snubber anchorage are functional. Snubbers which appear inoperable as a result of visual inspections shall be classified as unacceptable and may be reclassified acceptable for the purpose of establishing the next visual inspection interval, provided that (1) the cause of the rejection is clearly established and remedied for that particular snubber and for other snubbers irrespective of type that may be generically susceptible; and (2) the affected snubber is functionally tested in the as-found condition and determined OPERABLE per Specification 4.7.9f. All snubbers found connected to an inoperable common hydraulic fluid reservoir shall be counted as unacceptable for determining the next inspection interval. A review and evaluation shall be performed and documented to justify continued operation with an unacceptable snubber. If continued operation cannot be justified, the snubber shall be declared inoperable and the ACTION requirements shall be met.

#### d. Transient Event Inspection

An inspection shall be performed of all hydraulic and mechanical snubbers attached to sections of systems that have experienced unexpected, potentially damaging transients as determined from a review of operational data and a visual inspection of the systems within 6 months following such an event. In addition to satisfying the visual inspection acceptance criteria, freedom-of-motion of mechanical snubbers shall be verified using at least one of the following: (1) manually induced snubber movement; or (2) evaluation of in-place snubber piston setting; or (3) stroking the mechanical snubber through its full range of travel.

#### e. Functional Tests

At least once per 18 months during shutdown, a representative sample of snubbers shall be tested using one of the following sample plans. The sample plan shall be selected prior to the test period and cannot be changed during the test period. The NRC Regional Administrator shall be notified in writing of the sample plan selected prior to the test period or the sample plan used in the prior test period shall be implemented:

- 1) At least 10% of the total of each type of snubber shall be functionally tested either in-place or in a bench test. For each snubber of a type that does not meet the functional test acceptance criteria of Specification 4.7.9f., an additional 10% of that type of snubber shall be functionally tested until no more failures are found or until all snubbers of that type have been functionally tested; or
- 2) A representative sample of each type of snubber shall be functionally tested, in accordance with Figure 4.7-1. "C" is the

**TABLE 4.7.9-1**  
**SNUBBER VISUAL INSPECTION INTERVAL**

Population or Category (Notes 1 and 2)	NUMBER OF UNACCEPTABLE SNUBBERS		
	Column A Extend Interval (Notes 3 and 6)	Column B Repeat Interval (Notes 4 and 6)	Column C Reduce Interval (Notes 5 and 6)
1	0	0	1
80	0	0	2
100	0	1	4
150	0	3	8
200	2	5	13
300	5	12	25
400	8	18	36
500	12	24	48
750	20	40	78
1000 or greater	29	56	109

Note 1: The next visual inspection interval for a snubber population or category size shall be determined based upon the previous inspection interval and the number of unacceptable snubbers found during that interval. Snubbers may be categorized, based upon their accessibility during power operation, as accessible or inaccessible. These categories may be examined separately or jointly. However, the licensee must make and document that decision before any inspection and shall use that decision as the basis upon which to determine the next inspection interval for that category.

Note 2: Interpolation between population or category sizes and the number of unacceptable snubbers is permissible. Use the next lower integer for the value of the limit for Columns A, B, or C if that integer includes a fractional value of unacceptable snubbers as determined by interpolation.

**TABLE 4.7.9-1**  
**SNUBBER VISUAL INSPECTION INTERVAL**  
**(Continued)**

- Note 3: If the number of unacceptable snubbers is equal to or less than the number in Column A, the next inspection interval may be twice the previous interval but not greater than 48 months.
- Note 4: If the number of unacceptable snubbers is equal to or less than the number in Column B but greater than the number in Column A, the next inspection interval shall be the same as the previous interval.
- Note 5: If the number of unacceptable snubbers is equal to or greater than the number in Column C, the next inspection interval shall be two-thirds of the previous interval. However, if the number of unacceptable snubbers is less than the number in Column C but greater than the number in Column B, the next interval shall be reduced proportionally by interpolation, that is, the previous interval shall be reduced by a factor that is one-third of the ratio of the difference between the number of unacceptable snubbers found during the previous interval and the number in Column B to the difference in the numbers in Columns B and C.
- Note 6: The provisions of Specification 4.0.2 are applicable for all inspection intervals up to and including 48 months.

## PLANT SYSTEMS

### BASES

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#### SNUBBERS (Continued)

snubber shall be determined and approved by the Onsite Review and Investigative Function. The determination shall be based upon the existing radiation levels and the expected time to perform a visual inspection in each snubber location as well as other factors associated with accessibility during plant operations (e.g., temperature, atmosphere, location, etc.), and the recommendations of Regulatory Guide 8.8 and 8.10. The addition or deletion of any hydraulic or mechanical snubber shall be made in accordance with Section 50.59 of 10 CFR Part 50.

The visual inspection frequency is based upon maintaining a constant level of snubber protection to the safety-related systems, as given in Generic Letter 90-09, Alternative Visual Inspection Intervals and Corrective Actions. Therefore, the required schedule is based on the number of unacceptable snubbers found during the previous inspection in proportion to the sizes of various snubber populations or categories. The visual inspection interval for each type of snubber shall be determined based upon the criteria provided in Table 4.7.9-1 and the first inspection interval determined using this criteria shall be based upon the previous inspection interval as established by the requirements in effect before amendment 91.

The acceptance criteria are to be used in the visual inspection to determine ACCEPTABILITY of the snubbers. For example, if a fluid port of a hydraulic snubber is found to be uncovered, the snubber shall be declared unacceptable and shall not be determined ACCEPTABLE via functional testing.

To provide assurance of snubber functional reliability, one of three functional testing methods is used with stated acceptance criteria:

1. Functionally test 10% of a type of snubber with an additional 10% tested for each functional testing failure, or
2. Functionally test a sample size and determine sample acceptance or rejection using Figure 4.7-1, or
3. Functionally test a sample size and determine sample acceptance or rejection using the stated equation.



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

COMMONWEALTH EDISON COMPANY

DOCKET NO. 50-374

LASALLE COUNTY STATION, UNIT 2

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 75  
License No. NPF-18

1. The Nuclear Regulatory Commission (the Commission) has found that:
  - A. The application for amendment filed by the Commonwealth Edison Company (the licensee), dated March 2, 1993, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's regulations set forth in 10 CFR Chapter I;
  - B. The facility will operate in conformity with the application, the provisions of the Act, and the regulations of the Commission;
  - C. There is reasonable assurance: (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations set forth in 10 CFR Chapter I;
  - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
  - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the enclosure to this license amendment and paragraph 2.C.(2) of the Facility Operating License No. NPF-18 is hereby amended to read as follows:

(2) Technical Specifications and Environmental Protection Plan

The Technical Specifications contained in Appendix A, as revised through Amendment No. 75 , and the Environmental Protection Plan contained in Appendix B, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. This amendment is effective upon date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

*for William M. King, Jr.*

James E. Dyer, Director  
Project Directorate III-2  
Division of Reactor Projects - III/IV/V  
Office of Nuclear Reactor Regulation

Attachment:  
Changes to the Technical  
Specifications

Date of Issuance: September 1, 1993

ATTACHMENT TO LICENSE AMENDMENT NO. 75

FACILITY OPERATING LICENSE NO. NPF-18

DOCKET NO. 50-374

Replace the following pages of the Appendix "A" Technical Specifications with the enclosed pages. The revised pages are identified by amendment number and contain a vertical line indicating the area of change. The corresponding overleaf pages, as indicated by an asterisk, are provided to maintain document completeness.

<u>REMOVE</u>	<u>INSERT</u>
XXIII	XXIII
3/4 7-28	3/4 7-28
3/4 7-29	3/4 7-29
*3/4 7-30	*3/4 7-30
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## PLANT SYSTEMS

### 3/4.7.9 SNUBBERS

#### LIMITING CONDITION FOR OPERATION

---

3.7.9 All hydraulic and mechanical snubbers shall be OPERABLE.

APPLICABILITY: OPERATIONAL CONDITIONS 1, 2, and 3. OPERATIONAL CONDITIONS 4 and 5 for snubbers located on systems required OPERABLE in those OPERATIONAL CONDITIONS.

#### ACTION:

With one or more snubbers inoperable, on any system, within 72 hours replace or restore the inoperable snubber(s) to OPERABLE status and perform an engineering evaluation per Specification 4.7.9g. on the attached component or declare the attached system inoperable and follow the appropriate ACTION statement for that system.

#### SURVEILLANCE REQUIREMENTS

---

4.7.9 Each snubber shall be demonstrated OPERABLE by performance of the following augmented inservice inspection program and the requirements of Specification 4.0.5.

a. Inspection Types

As used in this specification, "type of snubber" shall mean snubbers of the same design and manufacturer, irrespective of capacity.

b. Visual Inspections

Snubbers are categorized as inaccessible or accessible during reactor operation. Each of these categories (inaccessible and accessible) may be inspected independently according to the schedule determined by Table 4.7.9-1. The visual inspection interval for each type of snubber shall be determined based upon the criteria provided in Table 4.7.9-1 and the first inspection interval determined using this criteria shall be based upon the previous inspection interval as established by the requirements in effect before amendment 75

c. Visual Inspection Acceptance Criteria

Visual inspections shall verify that (1) the snubber has no visible indications of damage or impaired OPERABILITY, (2) attachments to the foundation or supporting structure are functional, and

## PLANT SYSTEMS

### SURVEILLANCE REQUIREMENTS (Continued)

(3) fasteners for the attachment of the snubber to the component and to the snubber anchorage are functional. Snubbers which appear inoperable as a result of visual inspections shall be classified as unacceptable and may be reclassified acceptable for the purpose of establishing the next visual inspection interval, provided that (1) the cause of the rejection is clearly established and remedied for that particular snubber and for other snubbers irrespective of type that may be generically susceptible; and (2) the affected snubber is functionally tested in the as-found condition and determined OPERABLE per Specification 4.7.9f. All snubbers found connected to an inoperable common hydraulic fluid reservoir shall be counted as unacceptable for determining the next inspection interval. A review and evaluation shall be performed and documented to justify continued operation with an unacceptable snubber. If continued operation cannot be justified, the snubber shall be declared inoperable and the ACTION requirements shall be met.

#### d. Transient Event Inspection

An inspection shall be performed of all hydraulic and mechanical snubbers attached to sections of systems that have experienced unexpected, potentially damaging transients as determined from a review of operational data and a visual inspection of the systems within 6 months following such an event. In addition to satisfying the visual inspection acceptance criteria, freedom-of-motion of mechanical snubbers shall be verified using at least one of the following: (1) manually induced snubber movement; or (2) evaluation of in-place snubber piston setting; or (3) stroking the mechanical snubber through its full range of travel.

#### e. Functional Tests

At least once per 18 months during shutdown, a representative sample of snubbers shall be tested using one of the following sample plans. The sample plan shall be selected prior to the test period and cannot be changed during the test period. The NRC Regional Administrator shall be notified in writing of the sample plan selected prior to the test period or the sample plan used in the prior test period shall be implemented:

- 1) At least 10% of the total of each type of snubber shall be functionally tested either in-place or in a bench test. For each snubber of a type that does not meet the functional test acceptance criteria of Specification 4.7.9f., an additional 10% of that type of snubber shall be functionally tested until no more failures are found or until all snubbers of that type have been functionally tested; or
- 2) A representative sample of each type of snubber shall be functionally tested, in accordance with Figure 4.7-1. "C" is the

## PLANT SYSTEMS

### SURVEILLANCE REQUIREMENTS (Continued)

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#### e. Functional Tests (Continued)

total number of snubbers of a type found not meeting the acceptance requirements of Specification 4.7.9f. The cumulative number of snubbers of a type tested is denoted by "N". At the end of each day's testing, the new values of "N" and "C" (previous day's total plus current day's increments) shall be plotted on Figure 4.7-1. If at any time the point plotted falls in the "Reject" region, all snubbers of that type may be functionally tested. If at any time the point plotted falls in the "Accept" region, testing of snubbers of that type may be terminated. When the point plotted lies in the "Continue Testing" region, additional snubbers of that type shall be tested until the point falls in the "Accept" region or the "Reject" region, or all the snubbers of that type have been tested. Testing equipment failure during functional testing may invalidate that day's testing and allow that day's testing to resume anew at a later time provided all snubbers tested with the failed equipment during the day of equipment failure are retested; or

- 3) An initial representative sample of 55 snubbers shall be functionally tested. For each snubber type which does not meet the functional test acceptance criteria, another sample of at least one-half the size of the initial sample shall be tested until the total number tested is equal to the initial sample size multiplied by the factor,  $1 + C/2$ , where "C" is the number of snubbers found which do not meet the functional test acceptance criteria. The results from this sample plan shall be plotted using an "Accept" line which follows the equation  $N = 55(1 + C/2)$ . Each snubber point should be plotted as soon as the snubber is tested. If the point plotted falls on or below the "Accept" line, testing of that type of snubber may be terminated. If the point plotted falls above the "Accept" line, testing must continue until the point falls in the "Accept" region or all the snubbers of that type have been tested.

The representative sample selected for the functional test sample plans shall be randomly selected from the snubbers of each type and reviewed before beginning the testing. The review shall ensure, as far as practicable, that they are representative of the various configurations, operating environments, range of size, and capacity of snubbers of each type. Snubbers placed in the same location as snubbers which failed the previous functional test shall be retested at the time of the next functional test but shall not be included in the sample plan. If during the functional testing, additional sampling is required due to failure of only one type of snubber, the functional test results shall be reviewed at that time to determine if additional samples should be limited to the type of snubber which has failed the functional testing.

**TABLE 4.7.9-1**  
**SNUBBER VISUAL INSPECTION INTERVAL**

Population or Category (Notes 1 and 2)	NUMBER OF UNACCEPTABLE SNUBBERS		
	Column A Extend Interval (Notes 3 and 6)	Column B Repeat Interval (Notes 4 and 6)	Column C Reduce Interval (Notes 5 and 6)
1	0	0	1
80	0	0	2
100	0	1	4
150	0	3	8
200	2	5	13
300	5	12	25
400	8	18	36
500	12	24	48
750	20	40	78
1000 or greater	29	56	109

Note 1: The next visual inspection interval for a snubber population or category size shall be determined based upon the previous inspection interval and the number of unacceptable snubbers found during that interval. Snubbers may be categorized, based upon their accessibility during power operation, as accessible or inaccessible. These categories may be examined separately or jointly. However, the licensee must make and document that decision before any inspection and shall use that decision as the basis upon which to determine the next inspection interval for that category.

Note 2: Interpolation between population or category sizes and the number of unacceptable snubbers is permissible. Use the next lower integer for the value of the limit for Columns A, B, or C if that integer includes a fractional value of unacceptable snubbers as determined by interpolation.

**TABLE 4.7.9-1**  
**SNUBBER VISUAL INSPECTION INTERVAL**  
**(Continued)**

- Note 3: If the number of unacceptable snubbers is equal to or less than the number in Column A, the next inspection interval may be twice the previous interval but not greater than 48 months.
- Note 4: If the number of unacceptable snubbers is equal to or less than the number in Column B but greater than the number in Column A, the next inspection interval shall be the same as the previous interval.
- Note 5: If the number of unacceptable snubbers is equal to or greater than the number in Column C, the next inspection interval shall be two-thirds of the previous interval. However, if the number of unacceptable snubbers is less than the number in Column C but greater than the number in Column B, the next interval shall be reduced proportionally by interpolation, that is, the previous interval shall be reduced by a factor that is one-third of the ratio of the difference between the number of unacceptable snubbers found during the previous interval and the number in Column B to the difference in the numbers in Columns B and C.
- Note 6: The provisions of Specification 4.0.2 are applicable for all inspection intervals up to and including 48 months.

## PLANT SYSTEMS

### BASES

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#### 3/4.7.6 FIRE RATED ASSEMBLIES

The OPERABILITY of the fire barriers and barrier penetrations ensure that fire damage will be limited. These design features minimize the possibility of a single fire involving more than one fire area prior to detection and extinguishment. The fire barriers, fire barrier penetrations for conduits, cable trays and piping, fire windows, fire dampers, and fire doors are periodically inspected to verify their OPERABILITY.

#### 3/4.7.7 AREA TEMPERATURE MONITORING

The area temperature limitations ensure that safety-related equipment will not be subjected to temperatures in excess of their environmental qualification temperatures. Exposure to excessive temperatures may degrade equipment and can cause loss of its OPERABILITY. The temperature limits include allowance for an instrument error of  $\pm 7^{\circ}\text{F}$ .

#### 3/4.7.8 STRUCTURAL INTEGRITY OF CLASS 1 STRUCTURES

In order to assure that settlement does not exceed predicted and allowable settlement values, a program has been established to conduct a survey at the site. The allowable total differential settlement values are based on original settlement predictions. In establishing these tabulated values, an assumption is made that pipe and conduit connection have been designed to safely withstand the stresses which would develop due to total and differential settlement.

#### 3/4.7.9 SNUBBERS

All snubbers are required OPERABLE to ensure that the structural integrity of the Reactor Coolant System and all other safety-related systems is maintained during and following a seismic or other event initiating dynamic loads. Snubbers excluded from this inspection program are those installed on nonsafety-related systems and then only if their failure or failure of the system on which they are installed, would have no adverse effect on any safety-related system.

Snubbers are classified and grouped by design and manufacturer but not by size. For example, mechanical snubbers utilizing the same design features of the 2-kip, 10-kip, and 100-kip capacity manufactured by Company "A" are of the same type. The same design mechanical snubbers manufactured by Company "B" for the purpose of this Technical Specification would be of a different type, as would hydraulic snubbers from either manufacturer.

## PLANT SYSTEMS

### BASES

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#### SNUBBERS (Continued)

A list of individual snubbers with detailed information of snubbers location and size and of system affected shall be available at the plant in accordance with Section 50.71(c) of 10 CFR Part 50. The accessibility of each snubber shall be determined and approved by the Onsite Review and Investigative Function. The determination shall be based upon the existing radiation levels and the expected time to perform a visual inspection in each snubber location as well as other factors associated with accessibility during plant operations (e.g., temperature, atmosphere, location, etc.), and the recommendations of Regulatory Guide 8.8 and 8.10. The addition or deletion of any hydraulic or mechanical snubber shall be made in accordance with Section 50.59 of 10 CFR Part 50.

The visual inspection frequency is based upon maintaining a constant level of snubber protection to the safety-related systems, as given in Generic Letter 90-09, Alternative Visual Inspection Intervals and Corrective Actions. Therefore, the required schedule is based on the number of unacceptable snubbers found during the previous inspection in proportion to the sizes of various snubber populations or categories. The visual inspection interval for each type of snubber shall be determined based upon the criteria provided in Table 4.7.9-1 and first inspection interval determined using this criteria shall be based upon the previous inspection interval as established by the requirements in effect before amendment 75.

The acceptance criteria are to be used in the visual inspection to determine ACCEPTABILITY of the snubbers. For example, if a fluid port of a hydraulic snubber is found to be uncovered, the snubber shall be declared unacceptable and shall not be determined ACCEPTABLE via functional testing.

To provide assurance of snubber functional reliability, one of three functional testing methods is used with stated acceptance criteria:

1. Functionally test 10% of a type of snubber with an additional 10% tested for each functional testing failure, or
2. Functionally test a sample size and determine sample acceptance or rejection using Figure 4.7-1, or
3. Functionally test a representative sample size and determine sample acceptance or rejection using the stated equation.



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION  
RELATED TO AMENDMENT NO. 91 TO FACILITY OPERATING LICENSE NO. NPF-11 AND  
AMENDMENT NO. 75 TO FACILITY OPERATING LICENSE NO. NPF-18  
COMMONWEALTH EDISON COMPANY  
LASALLE COUNTY STATION, UNITS 1 AND 2  
DOCKET NOS. 50-373 AND 50-374

1.0 INTRODUCTION

By letter dated March 2, 1993, Commonwealth Edison Company (CECo, the licensee) proposed changes to the Technical Specifications (TS) for LaSalle County Station, Units 1 and 2. The proposed amendments would change the Snubber Visual Inspection Intervals and Corrective Actions in TS surveillance requirements 4.7.9.b and 4.7.9.c to the alternative requirements provided in Generic Letter (GL) 90-09, "Alternative Visual Inspection Intervals and Corrective Actions," dated December 11, 1990. The associated TS Bases would also be modified to reflect the TS change. Additionally, minor changes would be made to TS 4.7.9.e to remove a reference to the first refueling outage and a footnote referencing Cycle 2.

2.0 EVALUATION

The snubber visual examination schedule in the existing TS, is based on the permissible number of inoperable snubbers found during the visual examination. Because the existing snubber visual examination schedule is based only on the absolute number of inoperable snubbers found during the visual examinations irrespective of the total population of snubbers, licensee's with a large snubber population find the visual examination schedule excessively restrictive. The purpose of the alternative visual examination schedule is to allow the licensee to perform visual examinations and corrective actions during plant outages without reduction of the confidence level provided by the existing visual examination schedule. The new visual examination schedule specifies the permissible number of inoperable snubbers for various snubber populations. The basic examination interval is the normal fuel cycle up to 24 months. This interval may be extended to as long as twice the fuel cycle or reduced to as small as two-thirds of the fuel cycle depending on the number of unacceptable snubbers found during the visual examination. The examination interval may vary by +25 percent to coincide with the actual outage.

In the event one or more snubbers are found inoperable during a visual examination, the Limiting Conditions for Operation (LCO) in the present TS require the licensee to restore or replace the inoperable snubber(s) to operable status within 72 hours or declare the attached system inoperable and

follow the appropriate action statement for that system. This LCO will remain in the TS; however, the permissible number of inoperable snubber(s) and the subsequent visual examination interval will now be determined in accordance with the new visual examination schedule (Table 4.7-2 of Enclosure B of GL 90-09). As noted in the guidance for this line item TS improvement, certain corrective actions may have to be performed depending on the number of inoperable snubbers found. All requirements, for corrective actions and evaluations associated with the use of the visual examination schedule and stated in the footnotes 1 thru 6, (Table 4.7-2 of Enclosure B of GL 90-09) shall be included in the TS.

The licensee has proposed changes to TS 4.7.9 that are consistent with the guidance provided in GL 90-09 for the replacement of the snubber visual examination schedule with Table 4.7-2 of Enclosure B (including footnotes 1 thru 6) of GL 90-09. On the basis of its review of this matter, the staff finds that these proposed TS changes are consistent with GL 90-09 and, therefore, are acceptable.

The licensee's proposal included changes to the Bases for TS 4.7.9 to support the alternative snubber visual examination frequency described above. The staff has reviewed the proposed Bases changes and, since they are consistent with the TS change described above, finds them acceptable.

In addition to the changes to the snubber visual inspection schedule, the licensee is proposing minor changes to Section 4.7.9.e of both Units 1 and 2 TS. The licensee's proposal removes wording related to the first refueling shutdown from the specification for both units, since the current surveillance frequency is at least once per 18 months. The proposal also removes footnote "\*" from Section 4.7.9.e of Unit 1 TS, because Unit 1 is past Cycle 2; it's currently in Cycle 6. The staff has reviewed these proposed changes and, since they remove references that are no longer applicable, finds these changes acceptable.

### 3.0 STATE CONSULTATION

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

### 4.0 ENVIRONMENTAL CONSIDERATION

The amendments change a requirement with respect to the installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20 and change surveillance requirements. The NRC staff has determined that the amendments involve no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendments involve no significant hazards consideration, and there has been no public comment on such finding

(58 FR 36431). Accordingly, the amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendments.

#### 5.0 CONCLUSION

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

Principal Contributor: J. Rajan, EMEB

Date: September 1, 1993