

April 27, 1998

Mr. Oliver D. Kingsley, President  
Nuclear Generation Group  
Commonwealth Edison Company  
Executive Towers West III  
1400 Opus Place, Suite 500  
Downers Grove, IL 60515

SUBJECT: ISSUANCE OF AMENDMENTS (TAC NOS. M99726 AND M99727)

Dear Mr. Kingsley:

The U.S. Nuclear Regulatory Commission (Commission) has issued the enclosed Amendment No. 125 to Facility Operating License No. NPF-11 and Amendment No. 110 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 September 26, 1997, as supplemented on April 7, 1998.

The amendments revise the Technical Specifications (TS) for the Standby Gas Treatment System to upgrade the ventilation filter testing program to the latest industry standards and revise the TSs for the Drywell and Suppression Chamber Purge System (TS 3/4.6.1.8) to prohibit the simultaneous opening of the drywell and suppression chamber purge system isolation valves. The September 26, 1997, application also requested changes to the TS for the Control Room and Auxiliary Electric Equipment Room Emergency Filtration System. These proposed changes will be addressed by separate correspondence.

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:

Donna M. Skay, Project Manager  
Project Directorate III-2  
Division of Reactor Projects - III/IV  
Office of Nuclear Reactor Regulation

Docket Nos. 50-373, 50-374

- Enclosures: 1. Amendment No. 125 to NPF-11
- 2. Amendment No. 110 to NPF-18
- 3. Safety Evaluation

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D. Hills, RIII

E. Adensam, EGA1  
GHill (4), T5C3

S. Richards  
WBeckner, O13H15

*\* See previous concurrence*

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DATE	04/17/98	04/17/98	04/17/98	04/17/98	04/17/98	04/17/98

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Mr. Oliver D. Kingsley, President  
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 Commonwealth Edison Company  
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 1400 Opus Place, Suite 500  
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Sincerely,

Donna M. Skay, Project Manager  
 Project Directorate III-2  
 Division of Reactor Projects - III/IV  
 Office of Nuclear Reactor Regulation

Docket Nos. 50-373, 50-374

Enclosures: 1. Amendment No. to NPF-11  
 2. Amendment No. to NPF-18  
 3. Safety Evaluation

cc w/encl: See next page

**DISTRIBUTION:**

Docket File PUBLIC PDIII-2 r/f E. Adensam, EGA1 S. Richards  
 C. Moore DSKay OGC, O15B18 GHill (4), T5C3 WBeckner, O13H15  
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NAME	DSKAY	CMOORE	CBERLINGER	LMARSH		SRICHARDS
DATE	04/17/98	04/17/98	04/21/98	04/19/98	04/19/98	04/19/98

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

April 27, 1998

Mr. Oliver D. Kingsley, President  
Nuclear Generation Group  
Commonwealth Edison Company  
Executive Towers West III  
1400 Opus Place, Suite 500  
Downers Grove, IL 60515

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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,

A handwritten signature in cursive script that reads "Dorina M. Skay".

Dorina M. Skay, Project Manager  
Project Directorate III-2  
Division of Reactor Projects - III/IV  
Office of Nuclear Reactor Regulation

Docket Nos. 50-373, 50-374

Enclosures: 1. Amendment No. 125 to NPF-11  
2. Amendment No. 110 to NPF-18  
3. Safety Evaluation

cc w/encl: See next page

O. Kingsley  
Commonwealth Edison Company

LaSalle County Station  
Units 1 and 2

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- 2 -

LaSalle County Station  
Units 1 and 2

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

COMMONWEALTH EDISON COMPANY

DOCKET NO. 50-373

LASALLE COUNTY STATION, UNIT 1

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 125  
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 September 26, 1997, as supplemented on April 7, 1998, 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:

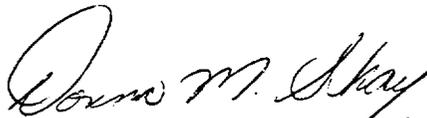
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P PDR

(2) Technical Specifications and Environmental Protection Plan

The Technical Specifications contained in Appendix A, as revised through Amendment No. 125 , 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 license amendment is effective as of the date of its issuance and shall be implemented prior to restart of LaSalle, Unit 2, from the current outage.

FOR THE NUCLEAR REGULATORY COMMISSION



Donna M. Skay, Project Manager  
Project Directorate III-2  
Division of Reactor Projects - III/IV  
Office of Nuclear Reactor Regulation

Attachment:  
Changes to the Technical  
Specifications

Date of Issuance: April 27, 1998

ATTACHMENT TO LICENSE AMENDMENT NO. 125

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

XVIII  
3/4 6-15  
3/4 6-41  
3/4 6-42  
B 3/4 6-2  
6-20a  
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INSERT

XVIII  
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B 3/4 6-2  
6-20a  
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ADMINISTRATIVE CONTROLS

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## CONTAINMENT SYSTEMS

### DRYWELL AND SUPPRESSION CHAMBER PURGE SYSTEM

#### LIMITING CONDITION FOR OPERATION

---

3.6.1.8 The drywell and suppression chamber purge system may be in operation with the drywell or suppression chamber purge supply and exhaust butterfly isolation valves open for inerting, de-inerting and pressure control. Purging through the Standby Gas Treatment System shall be restricted to less than or equal to 90 hours per 365 days.

APPLICABILITY: OPERATIONAL CONDITIONS 1, 2 AND 3

#### ACTION:

With any drywell or suppression chamber purge supply or exhaust butterfly isolation valve open for other than inerting, de-inerting or pressure control, close the butterfly valve(s) within one hour or be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.

#### SURVEILLANCE REQUIREMENTS

---

4.6.1.8.1 The cumulative time that the drywell and suppression chamber purge system has been in operation purging through the Standby Gas Treatment System shall be verified to be less than or equal to 90 hours per 365 days prior to use in this mode of operation.

CONTAINMENT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

---

- b. Perform required standby gas treatment filter testing in accordance with, and at the frequency specified by, the Ventilation Filter Testing Program.
- c. Deleted.
- d. At least once per 18 months by:
  - 1. Deleted.
  - 2. Verifying that the filter train starts and isolation dampers open on each of the following test signals:
    - a. Reactor Building exhaust plenum radiation - high,
    - b. Drywell pressure - high,
    - c. Reactor vessel water level - low low, level 2, and
    - d. Fuel pool vent exhaust radiation - high.
  - 3. Deleted.

CONTAINMENT SYSTEM<sup>c</sup>

SURVEILLANCE REQUIREMENTS (Continued)

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e. Deleted.

f. Deleted.

## CONTAINMENT SYSTEMS

### BASES

---

#### 3/4.6.1 PRIMARY CONTAINMENT

##### 3/4.6.1.4 DELETED

##### 3/4.6.1.5 DELETED

#### 3/4.6.1.6 DRYWELL AND SUPPRESSION CHAMBER INTERNAL PRESSURE

The limitation on drywell and suppression chamber internal pressure ensure that the containment peak pressure of 39.6 psig does not exceed the design pressure of 45 psig during LOCA conditions or that the external pressure differential does not exceed the design maximum external pressure differential of 5 psid. The limit of 2.0 psig for initial positive primary containment pressure will limit the total pressure to 39.6 psig which is less than the design pressure and is consistent with the accident analysis.

#### 3/4.6.1.7 DRYWELL AVERAGE AIR TEMPERATURE

The limitation on drywell average air temperature ensures that the containment peak air temperature does not exceed the design temperature of 340°F during LOCA conditions and is consistent with the accident analysis.

#### 3/4.6.1.8 DRYWELL AND SUPPRESSION CHAMBER PURGE SYSTEM

The drywell and suppression chamber purge supply and exhaust isolation valves are required to be closed during plant operation except as required for inerting, de-inerting and pressure control. During operations involving inerting, de-inerting and pressure control, only the drywell or suppression chamber purge supply and exhaust isolation valves may be open to prevent the creation of a bypass path between the drywell and suppression chamber. Creation of a bypass path between the drywell and the suppression chamber air space through the vent and purge lines would allow steam and gases from a LOCA to bypass the downcomers to the suppression pool in excess of design bypass leakage. These valves have been demonstrated capable of closing during a LOCA or steamline break accident from the full open position.

ADMINISTRATIVE CONTROLS

PLANT OPERATING PROCEDURES AND PROGRAMS (Continued)

7. Primary Containment Leakage Rate Testing Program

A program shall be established to implement the leakage rate testing of the primary containment as required by 10 CFR 50.54(o) and 10 CFR 50, Appendix J, Option B, as modified by approved exemptions. This program shall be in accordance with the guidelines contained in Regulatory Guide 1.163, "Performance-Based Containment Leak-Testing Program," dated September 1995.

The peak calculated primary containment internal pressure for the design basis loss of coolant accident,  $P_a$ , is 39.6 psig.

The maximum allowable primary containment leakage rate,  $L_a$ , at  $P_a$ , is 0.635% of primary containment air weight per day.

Leakage rate acceptance criteria are:

- a. Primary containment overall leakage rate acceptance criterion is  $\leq 1.0 L_a$ . During the first unit startup following testing in accordance with this program, the leakage rate acceptance criteria are  $\leq 0.60 L_a$  for the combined Type B and Type C tests, and  $\leq 0.75 L_a$  for Type A tests.
- b. Air lock testing acceptance criteria are:
  - 1) Overall air lock leakage rate is  $\leq 0.05 L_a$  when tested at  $\geq P_a$ .
  - 2) For each door, the seal leakage rate is  $\leq 5$  scf per hour when the gap between the door seals is pressurized to  $\geq 10$  psig.

The provisions of specification 4.0.2 do not apply to the test frequencies specified in the Primary Containment Leakage Rate Testing Program.

The provisions of specification 4.0.3 are applicable to the Primary Containment Leakage Rate Testing Program.

8. Ventilation Filter Testing Program (VFTP)

A program shall be established to implement the following required testing of Engineered Safety Feature (ESF) filter ventilation systems at the frequencies specified in Regulatory Guide 1.52, Revision 2, dated March 1978, and in accordance with ASME N510-1989.

The provisions of Specifications 4.0.2 and 4.0.3 are applicable to the VFTP test frequencies.

- a. Demonstrate for each of the ESF systems that an inplace test of the high efficiency particulate air (HEPA) filters shows a penetration and system bypass  $< 0.05\%$  when tested in accordance with ASME N510-1989, at the system flowrate specified below:

ESF Ventilation System	Flowrate (cfm)
SGBT System	$\geq 3600$ and $\leq 4400$

**PLANT OPERATING PROC. JRES AND PROGRAMS (Continued)**

- b. Demonstrate for each of the ESF system filter units that an inplace test of the charcoal adsorber shows a penetration and system bypass less than the value specified below, when tested in accordance with ASME N510-1989, at the system flowrate specified below:

ESF Ventilation System	Penetration and System Bypass	Flowrate (cfm)
SBG T System	0.05 %	≥ 3600 and ≤ 4400

- c. Demonstrate for each of the ESF systems that a laboratory test of a sample of the charcoal adsorber, when obtained as described in Regulatory Guide 1.52, Revision 2, shows the methyl iodide penetration less than the value specified below when tested in accordance with ASTM D3803-1989 at a temperature of 30°C, a relative humidity of 70 % and a face velocity as specified below.

ESF Ventilation System	Penetration	Face Velocity (fpm)
SBG T System	0.5 %	40

- d. Demonstrate for each of the ESF systems that the pressure drop across the combined moisture separator, heater, prefilter, HEPA filters and the charcoal adsorbers is less than the value specified below when tested at the system flowrate specified below:

ESF Ventilation System	Delta P (inches wg)	Flowrate (cfm)
SBG T System	8	≥ 3600 and ≤ 4400

- e. Demonstrate that the heaters for each of the ESF systems dissipate the electrical power specified below when tested in accordance with ASME N510-1989. These readings shall include appropriate corrections for variations from 480 Volts at the bus.

ESF Ventilation System	Wattage (kw)
SBG T System	≥ 21 and ≤ 25

**6.3 ACTION TO BE TAKEN IN THE EVENT OF A REPORTABLE EVENT IN PLANT OPERATION**

The following actions shall be taken for REPORTABLE EVENTS:

- a. The Commission shall be notified and a Licensee Event Report submitted pursuant to the requirements of Section 50.73 to 10 CFR Part 50, and
- b. Each REPORTABLE EVENT shall be reviewed by the Onsite Review and Investigative Function.



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

COMMONWEALTH EDISON COMPANY

DOCKET NO. 50-374

LASALLE COUNTY STATION, UNIT 2

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 110  
License No. NPF-18

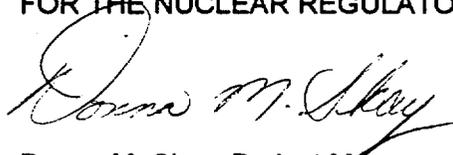
1. The Nuclear Regulatory Commission (the Commission) has found that:
  - A. The application for amendment filed by the Commonwealth Edison Company (the licensee), dated September 26, 1997, as supplemented on April 7, 1998, complies with the standards and requirements of the Atomic Energy Act of 1954, 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. 110 , 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 license amendment is effective as of the date of its issuance and shall be implemented prior to startup of LaSalle, Unit 1, from the current outage.

FOR THE NUCLEAR REGULATORY COMMISSION



Donna M. Skay, Project Manager  
Project Directorate III-2  
Division of Reactor Projects - III/IV  
Office of Nuclear Reactor Regulation

Attachment:  
Changes to the Technical  
Specifications

Date of Issuance: April 27, 1998

ATTACHMENT TO LICENSE AMENDMENT NO. 110

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. Pages indicated by an asterisk (\*) are overleaf pages and are provided for convenience only.

REMOVE

XVIII  
\*3/4 6-17  
3/4 6-18  
\*3/4 6-43  
3/4 6-44  
3/4 6-45  
B 3/4 6-2a  
6-20a  
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INSERT

XVIII  
\*3/4 6-17  
3/4 6-18  
\*3/4 6-43  
3/4 6-44  
3/4 6-45  
B 3/4 6-2a  
6-20a  
6-20b

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ADMINISTRATIVE CONTROLS

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## CONTAINMENT SYSTEMS

### DRYWELL AVERAGE AIR TEMPERATURE

#### LIMITING CONDITION FOR OPERATION

---

3.6.1.7 Drywell average air temperature shall not exceed 135°F.

APPLICABILITY: OPERATIONAL CONDITIONS 1, 2, and 3.

ACTION:

With the drywell average air temperature greater than 135°F, reduce the average air temperature to within the limit within 8 hours or be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.

#### SURVEILLANCE REQUIREMENTS

---

4.6.1.7 The drywell average air temperature shall be the average temperature of the operating return air plenum upstream of the primary containment ventilation heat exchanger coil and cabinet at the following locations and shall be determined to be within the limit at least once per 24 hours:

	<u>Elevation</u>	<u>Azimuth</u>
a.	740'0"	248°
b.	740'0"	76°

## CONTAINMENT SYSTEMS

### DRYWELL AND SUPPRESSION CHAMBER PURGE SYSTEM

#### LIMITING CONDITION FOR OPERATION

---

3.6.1.8 The drywell and suppression chamber purge system may be in operation with the drywell or suppression chamber purge supply and exhaust butterfly isolation valves open for inerting, deinerting, and pressure control. Purging through the Standby Gas Treatment System shall be restricted to less than or equal to 90 hours per 365 days.

APPLICABILITY: OPERATIONAL CONDITIONS 1, 2, and 3.

#### ACTION:

With any drywell or suppression chamber purge supply or exhaust butterfly isolation valve open for other than inerting, deinerting, or pressure control, close the butterfly valve(s) within 1 hour or be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.

#### SURVEILLANCE REQUIREMENTS

---

4.6.1.8.1 The cumulative time that the drywell and suppression chamber purge system has been in operation purging through the Standby Gas Treatment System shall be verified to be less than or equal to 90 hours per 365 days prior to use in this mode of operation.

## CONTAINMENT SYSTEMS

### STANDBY GAS TREATMENT SYSTEM

#### LIMITING CONDITION FOR OPERATION

---

3.6.5.3 Two independent standby gas treatment subsystems shall be OPERABLE.#

APPLICABILITY: OPERATIONAL CONDITIONS 1, 2, 3, and \*

ACTION:

- a. With one standby gas treatment subsystem inoperable, restore the inoperable subsystem to OPERABLE status within 7 days, or:
  1. In OPERABLE CONDITION 1, 2, or 3, be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.
  2. In OPERATIONAL CONDITION \*, suspend handling of irradiated fuel in the secondary containment, CORE ALTERATIONS and operations with a potential for draining the reactor vessel. The provisions of Specification 3.0.3 are not applicable.
- b. With both standby gas treatment subsystems inoperable in OPERATIONAL CONDITION \*, suspend handling of irradiated fuel in the secondary containment, CORE ALTERATIONS and operations with a potential for draining the reactor vessel. The provisions of Specification 3.0.3 are not applicable.

#### SURVEILLANCE REQUIREMENTS

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4.6.5.3 Each standby gas treatment subsystem shall be demonstrated OPERABLE:

- a. At least once per 31 days by initiating, from the control room, flow through the HEPA filters and charcoal adsorbers and verifying that the subsystem operates for at least 10 hours with the heaters OPERABLE.

\*When irradiated fuel is being handled in the secondary containment and during CORE ALTERATIONS and operations with a potential for draining the reactor vessel.

#The normal or emergency power source may be inoperable in OPERATIONAL CONDITION \*.

## CONTAINMENT SYSTEM

### SURVEILLANCE REQUIREMENTS (Continued)

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- b. Perform required standby gas treatment filter testing in accordance with, and at the frequency specified by, the Ventilation Filter Testing Program.
- c. Deleted.
- d. At least once per 18 months by:
  - 1. Deleted.
  - 2. Verifying that the filter train starts and isolation dampers open on each of the following test signals:
    - a. Reactor Building exhaust plenum radiation - high,
    - b. Drywell pressure - high,
    - c. Reactor vessel water level - low low, level 2, and
    - d. Fuel pool vent exhaust radiation - high.
  - 3. Deleted.

CONTAINMENT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

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e. Deleted.

f. Deleted.

## CONTAINMENT SYSTEMS

### BASES

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#### 3/4.6.1 PRIMARY CONTAINMENT

##### 3/4.6.1.5 DELETED

#### 3/4.6.1.6 DRYWELL AND SUPPRESSION CHAMBER INTERNAL PRESSURE

The limitation on drywell and suppression chamber internal pressure ensure that the containment peak pressure of 39.6 psig does not exceed the design pressure of 45 psig during LOCA conditions or that the external pressure differential does not exceed the design maximum external pressure differential of 5 psid. The limit of 2.0 psig for initial positive primary containment pressure will limit the total pressure to 39.6 psig which is less than the design pressure and is consistent with the accident analysis.

#### 3/4.6.1.7 DRYWELL AVERAGE AIR TEMPERATURE

The limitation on drywell average air temperature ensures that the containment peak air temperature does not exceed the design temperature of 340°F during LOCA conditions and is consistent with the accident analysis.

#### 3/4.6.1.8 DRYWELL AND SUPPRESSION CHAMBER PURGE SYSTEM

The drywell and suppression chamber purge supply and exhaust isolation valves are required to be closed during plant operation except as required for inerting, de-inerting and pressure control. During operations involving inerting, de-inerting and pressure control, only the drywell or suppression chamber purge supply and exhaust isolation valves may be open to prevent the creation of a bypass path between the drywell and suppression chamber. Creation of a bypass path between the drywell and the suppression chamber air space through the vent and purge lines would allow steam and gases from a LOCA to bypass the downcomers to the suppression pool in excess of design bypass leakage. These valves have been demonstrated capable of closing during a LOCA or steamline break accident from the full open position.

the Initial Structural Integrity Tests were not within 2 years of each other.

The Onsite Review and Investigative Function shall be responsible for reviewing and approving changes to the Inservice Inspection Program for Post Tensioning Tendons.

The provisions of 4.0.2 and 4.0.3 are applicable to the Tendon Surveillance Program inspection frequencies.

7. Primary Containment Leakage Rate Testing Program

A program shall be established to implement the leakage rate testing of the primary containment as required by 10 CFR 50.54(o) and 10 CFR 50, Appendix J, Option B, as modified by approved exemptions. This program shall be in accordance with the guidelines contained in Regulatory Guide 1.163, "Performance-Based Containment Leak-Testing Program," dated September 1995.

The peak calculated primary containment internal pressure for the design basis loss of coolant accident,  $P_a$ , is 39.6 psig.

The maximum allowable primary containment leakage rate,  $L_a$ , at  $P_a$ , is 0.635% of primary containment air weight per day.

Leakage rate acceptance criteria are:

- a. Primary containment overall leakage rate acceptance criterion is  $\leq 1.0 L_a$ . During the first unit startup following testing in accordance with this program, the leakage rate acceptance criteria are  $\leq 0.60 L_a$  for the combined Type B and Type C tests, and  $\leq 0.75 L_a$  for Type A tests.
- b. Air lock testing acceptance criteria are:
  - 1) Overall air lock leakage rate is  $\leq 0.05 L_a$  when tested at  $\geq P_a$ .
  - 2) For each door, the seal leakage rate is  $\leq 5$  scf per hour when the gap between the door seals is pressurized to  $\geq 10$  psig.

The provisions of specification 4.0.2 do not apply to the test frequencies specified in the Primary Containment Leakage Rate Testing Program.

The provisions of specification 4.0.3 are applicable to the Primary Containment Leakage Rate Testing Program.

8. Ventilation Filter Testing Program (VFTP)

A program shall be established to implement the following required testing of Engineered Safety Feature (ESF) filter ventilation systems at the frequencies specified in Regulatory Guide 1.52, Revision 2, dated March 1978, and in accordance with ASME N510-1989.

The provisions of Specifications 4.0.2 and 4.0.3 are applicable to the VFTP test frequencies.

**PLANT OPERATING PROC. JRES AND PROGRAMS (Continued)**

- a. Demonstrate for each of the ESF systems that an in-place test of the high efficiency particulate air (HEPA) filters shows a penetration and system bypass < 0.05 % when tested in accordance with ASME N510-1989, at the system flowrate specified below:

ESF Ventilation System	Flowrate (cfm)
SBGT System	≥ 3600 and ≤ 4400

- b. Demonstrate for each of the ESF system filter units that an in-place test of the charcoal adsorber shows a penetration and system bypass less than the value specified below, when tested in accordance with ASME N510-1989, at the system flowrate specified below:

ESF Ventilation System	Penetration and System Bypass	Flowrate (cfm)
SBGT System	0.05 %	≥ 3600 and ≤ 4400

- c. Demonstrate for each of the ESF systems that a laboratory test of a sample of the charcoal adsorber, when obtained as described in Regulatory Guide 1.52, Revision 2, shows the methyl iodide penetration less than the value specified below when tested in accordance with ASTM D3803-1989 at a temperature of 30°C, a relative humidity of 70 % and a face velocity as specified below.

ESF Ventilation System	Penetration	Face Velocity (fpm)
SBGT System	0.5%	40

- d. Demonstrate for each of the ESF systems that the pressure drop across the combined moisture separator, heater, prefilter, HEPA filters and the charcoal adsorbers is less than the value specified below when tested at the system flowrate specified below:

ESF Ventilation System	Delta P (inches wg)	Flowrate (cfm)
SBGT System	8	≥ 3600 and ≤ 4400

- e. Demonstrate that the heaters for each of the ESF systems dissipate the electrical power specified below when tested in accordance with ASME N510-1989. These readings shall include appropriate corrections for variations from 480 Volts at the bus.

ESF Ventilation System	Wattage (kw)
SBGT System	≥ 21 and ≤ 25

**6.3 ACTION TO BE TAKEN IN THE EVENT OF A REPORTABLE EVENT IN PLANT OPERATION**

The following actions shall be taken for REPORTABLE EVENTS:

- a. The Commission shall be notified and a Licensee Event Report submitted pursuant to the requirements of Section 50.73 to 10 CFR Part 50, and
- b. Each REPORTABLE EVENT shall be reviewed by the Onsite Review and Investigative Function.



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION  
RELATED TO AMENDMENT NO. 125 TO FACILITY OPERATING LICENSE NO. NPF-11 AND  
AMENDMENT NO. 110 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 September 26, 1997, as supplemented on April 7, 1998, Commonwealth Edison Company (ComEd, the licensee) requested changes to the Technical Specifications (TS) for LaSalle County Station, Units 1 and 2. The proposed changes would revise the TS to (1) prohibit the simultaneous opening of the drywell and suppression chamber purge system isolation valves, (2) upgrade the ventilation filter testing program to the latest industry standards, and (3) specify that the auxiliary electric equipment room is required to be habitable during design bases accidents. This amendment approves a portion of the request, specifically, changes to TS 3.6.1.8, "Drywell and Suppression Chamber Purge System," and surveillance requirement (SR) 4.6.5.3, "Standby Gas Treatment System," and adds a new TS 6.2.F.8, "Ventilation Filter Testing Program." The remaining portions of the amendment request will be addressed in separate correspondence. The April 7, 1998, submittal provided additional clarifying information that did not change the initial proposed no significant hazards consideration determination.

2.0 EVALUATION

2.1 Drywell and Suppression Chamber Purge System

TS 3.6.1.8 "Drywell and Suppression Chamber Purge System" allows for inerting, deinerting, and pressure control with the drywell and/or suppression chamber purge supply and exhaust isolation valves open. The wording of the current TS and the current operating procedures allow simultaneous purging or venting of the drywell and suppression chamber. The licensee has determined that with both valves open, a drywell floor bypass path would be created (from the drywell, through the drywell purge valves, through the suppression chamber main purge valves, into the suppression chamber) which would reduce the pressure suppression function of the suppression pool during a loss-of-coolant accident (LOCA). The evaluations of steam bypass of the suppression pool assume a maximum allowable leakage area of 0.03 square feet based on suppression chamber vacuum breaker valve seat leakage (this evaluation assumed that the drywell and suppression chamber purge isolation valves were closed). The amount of bypass that would result from both valves being open simultaneously would be greater than the design basis leakage of 0.03 square feet. The licensee has proposed to revise TS 3.6.1.8 to allow only one of the isolation valves to be open at a time, thereby ensuring that the only bypass will be through vacuum breaker seat leakage, consistent with the plant's design basis. TS 3.6.1.8 will

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be revised to delete the option to open the drywell and suppression chamber purge system isolation valves.

The proposed change will have no effect on plant safety since adequate purging or venting capability will still exist with the proposed restriction. The proposed change will improve plant safety and make the TS consistent with the design basis and is, therefore, acceptable.

## 2.2 Ventilation Filter Testing Program

The proposed amendments change the SR for the Standby Gas Treatment (SBGT) System as stated in TS 4.6.5.3. The licensee proposes to relocate the SR discussed below from the current TS to the Ventilation Filter Testing Program which is being added as Section 6.2.F.8 of the Administrative Controls section of the TS. The relocation of these surveillances is consistent with the Standard Technical Specifications (STS) for General Electric Plants, BWR/6 (NUREG-1434). The Ventilation Filter Testing Program contains the surveillances currently located in TS 4.6.5.3, but will reference updated industry standards.

### 2.2.1 Test Frequency

The current TS specify tests to be performed at the following frequencies: every 18 months; after every 720 hours of operation; following maintenance on the filter; and, after fire, painting or chemical release in a ventilation zone. Proposed TS 6.2.F.8 states that tests will be conducted at the frequencies specified in Regulatory Guide (RG) 1.52, Revision 2, "Design, Testing, and Maintenance Criteria for Postaccident Engineered-Safety-Feature Atmosphere Cleanup System Air Filtration and Adsorption Units of Light-Water-Cooled Nuclear Power Plants." This change is acceptable because RG 1.52 specifies the same testing frequencies.

### 2.2.2 Inplace Filter Testing

Current TS 4.6.5.3.b.1 requires verification that the inplace testing of the high-efficiency particulate air (HEPA) filter and charcoal adsorber satisfies the acceptance criteria and uses the test procedures of RG 1.52, Revision 2. It also requires that a flow rate of 4000 cfm  $\pm$ 10 percent is maintained when testing in accordance with ANSI N510-1975. These requirements are being relocated to Section 6.2.F.8 as discussed below.

Proposed TS 6.2.F.8.a requires that an inplace test of the HEPA filters in the SBGT system show a penetration and system bypass of less than 0.05 percent when tested in accordance with ASME N510-1989. The reference to the updated ASME standard is acceptable because it is consistent with the STS. The acceptance value of 0.05 percent for the SBGT system is consistent with RG 1.52, Revision 2 guidance and is acceptable.

Proposed TS 6.2.F.8.b provides the maximum penetration and system bypass for an in place test of the charcoal adsorbers. The proposed limit is 0.05 percent for SBGT systems. This limit is consistent with RG 1.52, Revision 2, and is acceptable. Proposed TS 6.2.F.8.a and b require testing at a flowrate of  $\geq$ 3600 and  $\leq$ 4400 cfm. This is consistent with the current TS requirement of 4000 cfm  $\pm$  10 percent .

### 2.2.3 Laboratory Testing

Current TS 4.6.5.3.b.2 and 4.6.5.3.c require that laboratory analyses of the carbon samples use the test procedures of and meet the acceptance criteria of Regulatory Position C.6.a of RG 1.52, Revision 2. Regulatory Position C.6.a refers to Table 2 of RG 1.52. Table 2 references Test 5.b of Table 5-1 of ANSI N509-1976, "Nuclear Power Plant Air-Cleaning Units and Components." Test 5.b references the test method from paragraph 4.5.3 of Military Specification RDT M 16-1T, "Gas Phase Adsorbents for Trapping Radioactive Iodine and Iodine Components" (date not indicated), but specifies that the test is to be conducted at 80 degrees Celsius and 95-percent relative humidity (RH) with preloading and postloading sweep at 25 degrees Celsius. This test is referred to as the "25-80-25 test." The essential elements of this test are as follows:

- 70-percent RH for air filtration systems designed to control the RH to 70-percent,
- 5-hour pre-equilibration (pre-sweep) time, with air at 25 degrees Celsius and 70-percent RH,
- 2-hour challenge, with gas at 80 degrees Celsius and 70-percent RH, and
- A 2-hour elution (post-sweep) time, with air at 25 degrees Celsius and 70-percent RH.

The licensee has proposed to relocate these surveillances to TS 6.2.F.8.c. The proposed SR also requires that samples be obtained as described in RG 1.52, Revision 2, but specifies that the samples be tested in accordance with ASTM D3803-1989, "Standard Test Method for Nuclear-Grade Activated Carbon." ASTM D3803-1989 is updated guidance based on an NRC verification and validation effort on ASTM D3803-1979, which is updated guidance based on RDT M16-1T. The essential elements of the proposed TS change for testing per ASTM D3803-1989 are:

- 70-percent RH for air filtration systems designed to control the RH to 70-percent,
- 2-hour thermal stabilization, with air at 30 degrees Celsius,
- 16-hour pre-equilibration (pre-sweep) time, with air at 30 degrees Celsius and 70-percent RH,
- 2-hour equilibration time, with air at 30 degrees Celsius and 70-percent RH,
- 1-hour challenge, with gas at 30 degrees Celsius and 70-percent RH, and
- 1-hour elution (post-sweep) time, with air at 30 degrees Celsius and 70-percent RH.

The major differences between the current and proposed TS requirements for carbon testing are:

<b>MAJOR DIFFERENCES</b>	<b>Proposed TS</b>	<b>Current TS</b>
<b>Pre-Equilibration (Pre-Sweep) Temperature</b>	30°C	25°C
<b>Challenge Temperature</b>	30°C	80°C
<b>Elution (Post-Sweep) Temperature</b>	30°C	25°C
<b>Total Pre-Test Equilibration</b>	18 hours	5 hours
<b>Tolerances of Test Parameters</b>	Smaller	Larger

The discussion below demonstrates that these differences make the proposed TS more conservative than the present TS requirements.

ASTM D3803-1989 challenges the representative charcoal samples at 30 degrees Celsius rather than at 80 degrees Celsius. The quantity of water retained by charcoal is dependent on temperature, with less water being retained as the temperature rises. The water retained by the charcoal decreases its efficiency in adsorbing other contaminants. Because most charcoal is anticipated to be challenged at a temperature closer to 30 degrees Celsius rather than 80 degrees Celsius, the lower temperature test condition of ASTM D3803-1989 will yield more realistic results than a test performed at 80 degrees Celsius.

ASTM D3803-1989 specifies a test temperature of 30 degrees Celsius for both the pre- and post-test sweep rather than 25 degrees Celsius. There is little difference in the adsorption behavior of charcoal between these two temperatures. A temperature of 25 degrees Celsius is more conservative; however, the increase from 25 degrees Celsius to 30 degrees Celsius does not represent a significant variation in the test results.

ASTM D3803-1989 provides results which are reproducible compared to RDT M 16-1T because it has smaller tolerances on various test parameters, and it requires that the charcoal sample be pre-equilibrated for a much longer period. The longer pre-equilibration time is more conservative because it will completely saturate the representative charcoal sample until it is in the condition to which the subject charcoal adsorbers are expected to be exposed during design-basis conditions. During the pre-equilibration, the charcoal is exposed to a flow of air controlled at the test temperature and RH before the challenge gas is fed through the charcoal. The purpose of the pre-equilibration phase of the test is to ensure that the charcoal has stabilized at the specified test temperature and RH for a period of time which results in the charcoal adsorbing all the available moisture before the charcoal is challenged with methyl iodide. Hence, the proposed testing in accordance with ASTM D-3803-1989 standard would result in a more realistic prediction of the capability of the charcoal.

Proposed TS 6.2.F.8.c also requires testing of charcoal samples at a temperature of 30 degrees Celsius, a RH of 70 percent and a face velocity of 40 feet/minute for the SBT system. The SBT system charcoal adsorber has a depth of 8 inches. At a residence time of .25 second for each 2 inches of depth, per RG 1.52, this equals a total residence time of 1 second. The filters are designed for a residence time of 2 seconds at a face velocity of 20 fpm. The licensee proposed to test at a face velocity of 40 fpm to be consistent with RG 1.52, Revision 2. Therefore, the proposed testing will provide more conservative results relative to the design flow and is acceptable.

Per RG 1.52, the SBT charcoal bed (with a depth of >4 inches) has an efficiency of 99 percent. The licensee's proposed acceptance criteria is a methyl iodide penetration of less than 0.5 percent. The proposed acceptance criteria includes a safety factor of two which provides the staff a degree of assurance that, at the end of the operating cycle, the charcoal will be capable of performing at a level at least as good as that assumed in the licensee's dose analysis. This factor of safety is acceptable based on the accuracy of test results obtained using the ASTM D3803-1989 standard. Based on a safety factor of two, the allowable penetration as stated in the proposed TS is 0.5 percent for SBT.

The staff has reviewed the proposed test methods and acceptance criteria in TS 6.2.F.8.c and finds them acceptable.

#### 2.2.4 Other Surveillances

Current TS 4.6.5.3.d.1 requires verification that the pressure drop across the combined HEPA filters and charcoal adsorber banks is less than or equal to eight inches water gauge while operating the filter train at a flow rate of 4000 cfm  $\pm$ 10 percent. This surveillance is being relocated to proposed TS 6.2.F.8.d. The proposed TS requires a demonstration that the pressure drop across the combined moisture separator, heater, prefilter, HEPA filters and the charcoal adsorbers is less than 8 inches water gauge for the SBT system when tested at a flowrate of  $\geq$ 3600 cfm and  $\leq$ 4400 cfm. This is consistent with the current TS and is acceptable.

Current TS 4.6.5.3.d.3 requires verification that the heaters dissipate  $23 \pm 2.0$  kW when tested in accordance with ANSI N510. Proposed TS 6.2.F.8.e requires that the heaters for the SBT system dissipate between 21 and 25 kW when tested in accordance with ASME N510-1989. These limits are consistent with those in the current TS and are acceptable.

#### 2.2.5 Conclusion

The Ventilation Filter Testing Program proposed by the licensee is consistent with the program in NUREG-1434, STS General Electric Plants, BWR/6, Section 5.5.8. The requested changes to TS 4.6.5.3 revise charcoal filter testing such that existing flawed test methodology will reflect the current industry standard. The staff has evaluated these changes and concludes that the testing methodology proposed by the licensee adequately demonstrates the operability of the SBTs and is, therefore, acceptable.

### 2.3 Editorial Changes

The paragraph numbering and indentation of TS 6.2.F.7 are revised for consistency with the remainder of TS 6.2.F.

### 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 (62 FR 61840). 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: D. Skay

Date: April 27, 1998