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10 CFR 50.90

RS-07-073
June 18, 2007

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555

LaSalle County Station, Units 1 and 2
Facility Operating License Nos. NPF-11 and NPF-18
NRC Docket Nos. 50-373 and 50-374

Subject: Application for Technical Specification Change TSTF-477, Adding an Action Statement for Two Inoperable Control Room Air Conditioning Subsystems, Using the Consolidated Line Item Improvement Process

Reference: TSTF-477, Revision 3, "Add Action for Two Inoperable Control Room AC Subsystems"

In accordance with 10 CFR 50.90, "Application for amendment of license or construction permit," Exelon Generation Company, LLC (EGC) is requesting a change to the Technical Specifications (TS) of Facility Operating License Nos. NPF-11 and NPF-18 for LaSalle County Station (LSCS), Units 1 and 2. The proposed changes would revise TS 3.7.5, "Control Room Area Ventilation Air Conditioning (AC) System," to add an Action Statement for two inoperable control room area ventilation AC subsystems.

Attachment 1 provides a description of the proposed change, the requested confirmation of applicability, and plant-specific verifications. Attachment 2 provides the existing TS pages marked up to show the proposed change. Attachment 3 provides revised (clean) TS pages. Attachment 4 provides the existing TS Bases pages marked up to show the proposed change in accordance with 10 CFR 50.36(a). Bases pages are provided for information only and do not require NRC approval.

EGC requests approval of the proposed license amendment by June 18, 2008, with implementation within 60 days of issuance.

This amendment request has been reviewed and approved by the LSCS Plant Operations Review Committee and the Nuclear Safety Review Board in accordance with the requirements of the EGC Quality Assurance Program.

In accordance with 10 CFR 50.91, "Notice for public comment," EGC is notifying the State of Illinois of this application for amendment by transmitting a copy of this letter and its attachments to the designated State Official.

There are no regulatory commitments contained within this letter. Should you have any questions concerning this letter, please contact Ms. Michelle Yun at (630) 657-2818.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 18th day of June 2007.

Respectfully,

Darin M. Benyak
Director – Licensing and Regulatory Affairs
Exelon Generation Company, LLC

Attachment 1: Description of Proposed Changes, Technical Analysis, and Regulatory Analysis
Attachment 2: Mark-up of Proposed Technical Specification Page Changes
Attachment 3: Revised Technical Specification Pages
Attachment 4: Mark-up of Technical Specification Bases Page Changes

Attachment 1
Description of Proposed Changes, Technical Analysis, and Regulatory Analysis

1.0 DESCRIPTION

The proposed amendment would modify Technical Specifications (TS) 3.7.5, "Control Room Area Ventilation AC System," by adding an Action Statement to the Limiting Condition of Operation (LCO). The new Action Statement allows 72 hours to restore one control room area ventilation AC subsystem to operable status and requires verification that control room area temperature remains < 90°F every four hours.

The changes are consistent with Nuclear Regulatory Commission (NRC) approved Industry/Technical Specification Task Force (TSTF) TSTF-477, Revision 3. The availability of this TS improvement was published in the *Federal Register* on March 26, 2007 as a part of the Consolidated Line Item Improvement Process (CLIIP).

2.0 ASSESSMENT

2.1 Applicability of TSTF-477 and Published Safety Evaluation

Exelon Generation Company, LLC (EGC) has reviewed TSTF-477 (Reference 1), and the NRC model Safety Evaluation (Reference 2) as part of the CLIIP. EGC has concluded that the information in TSTF-477, as well as the safety evaluation prepared by the NRC are applicable to LaSalle County Station (LSCS), Units 1 and 2 and provide justification for the incorporation of the changes to the LSCS, Units 1 and 2 TS.

2.2 Optional Changes and Variations

EGC is not proposing any variations or deviations from the TS changes described in TSTF-477, Revision 3, or the NRC model safety evaluation dated December 18, 2006. While the LSCS, Units 1 and 2 TS 3.7.5 is based on NUREG-1434, "Standard Technical Specifications General Electric Plants, BWR/6," proposed changes are modeled after changes made to Standard TS (STS) 3.7.5 for BWR/4 in TSTF-477 since TSTF-477 provides technical justification for the addition of an allowed outage time of 72 hours.

3.0 REGULATORY ANALYSIS

3.1 No Significant Hazards Consideration Determination

Exelon Generation Company, LLC (EGC) has reviewed the proposed No Significant Hazards Consideration Determination (NSHCD) published in the *Federal Register* as part of the Consolidated Line Item Improvement Process (CLIIP). EGC has concluded that the proposed NSHCD presented in the *Federal Register* notice is applicable to LaSalle County Station (LSCS), Units 1 and 2 and is hereby incorporated by reference to satisfy the requirements of 10 CFR 50.91(a), "Notice for public comment."

3.2 Verification and Commitments

As discussed in the notice of availability published in the *Federal Register* on March 26, 2007 for this TS improvement, plant-specific verifications were performed as follows. TSTF-477 is applicable to all licensees of General Electric Boiling Water Reactors who have adopted or will adopt in conjunction with the change, the TS requirements for a

Bases Control Program consistent with the TS Bases Control Program described in Section 5.5 of the STS. LSCS is a General Electric BWR/5 with TS that do not currently have an action for two inoperable control room area ventilation air conditioning subsystems. EGC has proposed TS Bases consistent with TSTF-477, which provide guidance and details on how to implement the new requirements. Finally, EGC has a Bases Control Program consistent with Section 5.5 of the STS.

4.0 ENVIRONMENTAL EVALUATION

The amendment changes requirements with respect to the installation or use of a facility component located within the restricted area as defined in 10 CFR 20, "Standards for Protection Against Radiation." The NRC has determined that the amendment adopting TSTF-477, Revision 3, involves no significant increases in amounts of effluents that may be released offsite, no significant changes in the types of effluents that may be released offsite, and no significant increases in individual or cumulative occupational radiation exposure. The NRC has previously issued a proposed finding that TSTF-477, Revision 3, involves no significant hazards considerations and there has been no public comment on said finding in the *Federal Register,* Notice 71 FR 75774, December 18, 2006. The amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9), "Criterion for categorical exclusion." In accordance with 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of this amendment.

5.0 IMPACT ON PREVIOUS SUBMITTALS

This request seeks to execute changes on TS 3.7.5 which currently has a pending amendment. The following lists the associated amendment pending.

TSTF-423, Risk-Informed Action End States	3.7.5	Submitted 10/18/06

6.0 REFERENCES

1. TSTF-477, Revision 3, "Adding an Action Statement for Two Inoperable Control Room Air Conditioning Subsystems"

2. NRC Model Safety Evaluation Report, 71 FR 75774, dated December 18, 2006

Attachment 2
Mark-up of Proposed Technical Specification Page Changes

TS 3.7.5 –1
TS 3.7.5 –2
TS 3.7.5 –3

3.7 PLANT SYSTEMS

3.7.5 Control Room Area Ventilation Air Conditioning (AC) System

LCO 3.7.5 Two control room area ventilation AC subsystems shall be OPERABLE.

APPLICABILITY: MODES 1, 2, and 3,
During movement of irradiated fuel assemblies in the secondary containment,
During CORE ALTERATIONS,
During operations with a potential for draining the reactor vessel (OPDRVs).

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One control room area ventilation AC subsystem inoperable.	A.1 Restore control room area ventilation AC subsystem to OPERABLE status.	30 days
C. ~~B.~~ Required Action and Associated Completion Time of Condition A not met in MODE 1, 2, or 3. or B	~~B.1~~ C.1 Be in MODE 3. AND ~~B.2~~ C.2 Be in MODE 4.	12 hours 36 hours
B. Two control room area ventilation AC subsystems inoperable.	B.1 Verify control room area temperature < 90°F. AND B.2 Restore one control room area ventilation AC subsystem to OPERABLE status.	Once per 4 hours 72 hours

(continued)

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
D. ~~C.~~ Required Action and associated Completion Time of Condition A not met during movement of irradiated fuel assemblies in the secondary containment, during CORE ALTERATIONS, or during OPDRVs.	----------NOTE---------- LCO 3.0.3 is not applicable. ----------	
	~~C.1~~ D.1 Place OPERABLE control room area ventilation AC subsystem in operation.	Immediately
	OR	
	~~C.2.1~~ D.2.1 Suspend movement of irradiated fuel assemblies in the secondary containment.	Immediately
	AND	
	~~C.2.2~~ D.2.2 Suspend CORE ALTERATIONS.	Immediately
	AND	
	~~C.2.3~~ D.2.3 Initiate action to suspend OPDRVs.	Immediately
~~D. Two control room area ventilation AC subsystems inoperable in MODE 1, 2, or 3.~~	~~D.1 Enter LCO 3.0.3.~~	~~Immediately~~

(continued)

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
E. ~~Two control room area ventilation AC subsystems inoperable~~ during movement of irradiated fuel assemblies in the secondary containment, during CORE ALTERATIONS, or during OPDRVs.	----------NOTE---------- LCO 3.0.3 is not applicable. ----------	
	E.1 Suspend movement of irradiated fuel assemblies in the secondary containment.	Immediately
	AND	
	E.2 Suspend CORE ALTERATIONS.	Immediately
	AND	
	E.3 Initiate action to suspend OPDRVs.	Immediately

Required Action and associated Completion Time of Condition B not met

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.7.5.1	Monitor control room and auxiliary electric equipment room temperatures.	12 hours
SR 3.7.5.2	Verify correct breaker alignment and indicated power are available to the control room area ventilation AC subsystems.	7 days

Attachment 3
Revised Technical Specification Pages

TS 3.7.5 –1
TS 3.7.5 –2
TS 3.7.5 –3

3.7 PLANT SYSTEMS

3.7.5 Control Room Area Ventilation Air Conditioning (AC) System

LCO 3.7.5 Two control room area ventilation AC subsystems shall be OPERABLE.

APPLICABILITY: MODES 1, 2, and 3,
During movement of irradiated fuel assemblies in the secondary containment,
During CORE ALTERATIONS,
During operations with a potential for draining the reactor vessel (OPDRVs).

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One control room area ventilation AC subsystem inoperable.	A.1 Restore control room area ventilation AC subsystem to OPERABLE status.	30 days
B. Two control room area ventilation AC subsystems inoperable.	B.1 Verify control room area temperature < 90°F. AND B.2 Restore one control room area ventilation AC subsystem to OPERABLE status.	Once per 4 hours 72 hours
C. Required Action and Associated Completion Time of Condition A or B not met in MODE 1, 2, or 3.	C.1 Be in MODE 3. AND C.2 Be in MODE 4.	12 hours 36 hours

(continued)

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
D. Required Action and associated Completion Time of Condition A not met during movement of irradiated fuel assemblies in the secondary containment, during CORE ALTERATIONS, or during OPDRVs.	----------NOTE---------- LCO 3.0.3 is not applicable. ----------	
	D.1 Place OPERABLE control room area ventilation AC subsystem in operation.	Immediately
	OR	
	D.2.1 Suspend movement of irradiated fuel assemblies in the secondary containment.	Immediately
	AND	
	D.2.2 Suspend CORE ALTERATIONS.	Immediately
	AND	
	D.2.3 Initiate action to suspend OPDRVs.	Immediately

(continued)

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
E. Required Action and associated Completion Time of Condition B not met during movement of irradiated fuel assemblies in the secondary containment, during CORE ALTERATIONS, or during OPDRVs.	----------NOTE---------- LCO 3.0.3 is not applicable. ----------	
	E.1 Suspend movement of irradiated fuel assemblies in the secondary containment.	Immediately
	AND	
	E.2 Suspend CORE ALTERATIONS.	Immediately
	AND	
	E.3 Initiate action to suspend OPDRVs.	Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.7.5.1	Monitor control room and auxiliary electric equipment room temperatures.	12 hours
SR 3.7.5.2	Verify correct breaker alignment and indicated power are available to the control room area ventilation AC subsystems.	7 days

Attachment 4
Mark-up of Technical Specification Bases Page Changes

B 3.7.5 –4
B 3.7.5 –5
B 3.7.5 –6

BASES

ACTIONS A.1 (continued)

on the low probability of an event occurring requiring operation of the CRAF System in the pressurization mode and the consideration that the remaining subsystem can provide the required protection.

Insert 1

~~B.1 and B.2~~ C.1 and C.2

subsystem(s)

In MODE 1, 2, or 3, if the inoperable control room area ventilation AC ~~subsystem~~ cannot be restored to OPERABLE status within the associated Completion Time, the unit must be placed in a MODE that minimizes risk. To achieve this status the unit must be placed in at least MODE 3 within 12 hours and in MODE 4 within 36 hours. The allowed Completion Times are reasonable, based on operating experience, to reach the required unit conditions from full power conditions in an orderly manner and without challenging unit systems.

D.1, D.2.1, D.2.2, and D.2.3

~~C.1, C.2.1, C.2.2, and C.2.3~~

LCO 3.0.3 is not applicable while in MODE 4 or 5. However, since irradiated fuel assembly movement can occur in MODE 1, 2, or 3, the Required Actions of Condition C are modified by a Note indicating that LCO 3.0.3 does not apply. If moving irradiated fuel assemblies while in MODE 1, 2, or 3, the fuel movement is independent of reactor operations. Entering LCO 3.0.3 while in MODE 1, 2, or 3 would require the unit to be shutdown, but would not require immediate suspension of movement of irradiated fuel assemblies. The Note to the ACTIONS, "LCO 3.0.3 is not applicable," ensures that the actions for immediate suspension of irradiated fuel assembly movement are not postponed due to entry into LCO 3.0.3.

D

During movement of irradiated fuel assemblies in the secondary containment, during CORE ALTERATIONS, or during OPDRVs, if Required Action A.1 cannot be completed within the required Completion Time, the OPERABLE control room AC subsystem may be placed immediately in operation.

(continued)

BASES

ACTIONS ~~C.1, C.2.1, C.2.2, and C.2.3~~ D.1, D.2.1, D.2.2, and D.2.3 (continued)

This action ensures that the remaining subsystem is OPERABLE, that no failures that would prevent actuation will occur, and that any active failure will be readily detected.

An alternative to Required Action ~~C.1~~ D.1 is to immediately suspend activities that present a potential for releasing radioactivity that might require isolation of the control room. This places the unit in a condition that minimizes risk.

If applicable, CORE ALTERATIONS and movement of irradiated fuel assemblies in the secondary containment must be suspended immediately. Suspension of these activities shall not preclude completion of movement of a component to a safe position. Also, if applicable, action must be initiated immediately to suspend OPDRVs to minimize the probability of a vessel draindown and subsequent potential for fission product release. Action must continue until the OPDRVs are suspended.

~~D.1~~

~~If both control room area ventilation AC subsystems are inoperable in MODE 1, 2, or 3, the Control Room Area Ventilation AC System may not be capable of performing the intended function. Therefore, LCO 3.0.3 must be entered immediately.~~

E.1, E.2, and E.3

The Required Actions of Condition E.1 are modified by a Note indicating that LCO 3.0.3 does not apply. If moving irradiated fuel assemblies while in MODE 1, 2, or 3, the fuel movement is independent of reactor operations. Therefore, inability to suspend movement of irradiated fuel assemblies is not sufficient reason to require a reactor shutdown.

During movement of irradiated fuel assemblies in the secondary containment, during CORE ALTERATIONS, or during

(continued)

BASES

ACTIONS

E.1, E.2, and E.3 (continued)

if Required Actions B.1 and B.2 cannot be met within the required Completion Times

OPDRVs ~~with two control room area ventilation AC subsystems inoperable,~~ action must be taken to immediately suspend activities that present a potential for releasing radioactivity that might require isolation of the control room. This places the unit in a condition that minimizes risk.

If applicable, CORE ALTERATIONS and handling of irradiated fuel in the secondary containment must be suspended immediately. Suspension of these activities shall not preclude completion of movement of a component to a safe position. Also, if applicable, action must be initiated immediately to suspend OPDRVs to minimize the probability of a vessel draindown and subsequent potential for fission product release. Action must continue until the OPDRVs are suspended.

SURVEILLANCE REQUIREMENTS

SR 3.7.5.1

This SR monitors the control room and AEER temperatures for indication of Control Room Area Ventilation AC System performance. Trending of control room area temperature will provide a qualitative assessment of refrigeration unit OPERABILITY. Limiting the average temperature of the Control Room and AEER to less than or equal to 85°F provides a threshold beyond which the operating control room area ventilation AC subsystem is no longer demonstrating capability to perform its function. This threshold provides margin to temperature limits at which equipment qualification requirements could be challenged. Subsystem operation is routinely alternated to support planned maintenance and to ensure each subsystem provides reliable service. The 12 hour Frequency is adequate considering the continuous manning of the control room by the operating staff.

(continued)

TSTF-477 Technical Specification Bases Page Insert 1
LaSalle County Station

B.1 and B.2

If both control room area ventilation AC subsystems are inoperable, the control room area ventilation AC system may not be capable of performing its intended function. Therefore, the control room area temperature is required to be monitored to ensure that temperature is being maintained low enough that equipment in the control room area is not adversely affected. With the control room area temperature being maintained within the temperature limit, 72 hours is allowed to restore a control room area ventilation AC subsystem to OPERABLE status. The Completion Time is reasonable considering that the control room area temperature is being maintained within limits and the low probability of an event occurring requiring control room area isolation.