50-237 DRESDEN 2 CEC

DESCRIPTION AND SAFETY ANALYSIS OF THE PROPOSED CHANGES

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ATTACHMENT A
DESCRIPTION AND SAFETY ANALYSIS OF THE PROPOSED CHANGES

Description of the Proposed Change

The proposed license amendment request includes the following changes to the Technical Specifications for Dresden, Quad Cities and LaSalle County Stations:

Dresden/Quad Cities

1. Definitions

   Dresden and Quad Cities definition for PRIMARY CONTAINMENT INTEGRITY references 3.7.B. Due to the proposed changes, this cross-reference is modified to correctly cross-reference 3.7.A.

2. Primary Containment Integrity and Leakage Requirements

   Dresden and Quad Cities Technical Specification Surveillance Requirements 4.7.A.1, 4.7.B.1, 4.7.B.2 and 4.7.B.3 restate the requirements of 10 CFR 50 Appendix J for periodic leakage rate testing for Type A tests and therefore must be changed in conjunction with the changes necessitated by Option B to 10 CFR 50, Appendix J. The surveillance requirements specified within portions of 4.7.A.1 and 4.7.B.4 address Type B and Type C testing and the exceptions provided by Appendix J with an approved exemption concerning Main Steam Isolation Valve leakage test requirements. These requirements are either encompassed within the requirements specified by Option B to 10 CFR 50, Appendix J, are encompassed within Technical Specification Section 3/4.7.D, Primary Containment Isolation Valves, or are encompassed within the proposed changes to Technical Specification Section 6.8.D.5, Administrative Controls.

   The proposed amendment for Dresden and Quad Cities deletes Technical Specification 3/4.7.B, Primary Containment Leakage, which includes Surveillance Requirements 4.7.B.1, 4.7.B.2, 4.7.B.3 and 4.7.B.4. The specifications deleted are replaced by a new surveillance requirement in Technical Specification 3/4.7.A.1, Primary Containment Integrity, that will require visual examinations and leakage rate testing in accordance with the Primary Containment Leakage Rate Testing Program. The requirements specified within Technical Specification 4.7.B.4.b are relocated to 4.7.D.6. As such, the Limiting Conditions for Operation, Actions and Applicability specified in 3/4.7.B are encompassed within 3/4.7.A or 4.7.D.6. The Primary Containment Leakage Rate Testing Program is further defined in Technical Specification Section 6.8.D.5, Administrative Controls.

3. Primary Containment Air Locks

   Technical Specification 3.7.C, Limiting Conditions for Operation includes details regarding the open status of air lock doors. This information is relocated to administrative controls consistent with NUREG-1433. The leakage acceptance criteria are relocated to 6.8.D.5.

Technical Specification Surveillance Requirement 4.7.C.1 restates the requirements of 10 CFR 50 Appendix J for periodic leakage rate testing for primary containment air locks and therefore must be changed in conjunction with the changes necessitated by Option B to 10 CFR 50 Appendix J. These requirements are either encompassed within the requirements specified by Option B to 10 CFR 50, Appendix J, or are encompassed within the proposed changes to Technical Specification Section 6.8.D.5, Administrative Controls regarding the inclusion of the Primary Containment Leakage Rate Testing Program.

Technical Specification Surveillance Requirement 4.7.C.2 is similarly modified to maintain consistency with the aforementioned changes introduced by Option B to 10 CFR 50, Appendix J. The proposed annotations for 4.7.C.2 provide clarity for defining OPERABILITY acceptance criteria. The proposed changes are proposed in accordance with the guidelines specified in NUREG-1433.

4. Administrative Controls

Dresden and Quad Cities propose adding the Primary Containment Leakage Rate Testing Program to Technical Specification Section 6.8.D.5. The Program is defined in accordance with the requirements of 10 CFR 50.54(o) and Option B to 10 CFR 50, Appendix J, as modified by approved exemptions. The program is in accordance with the guidelines contained within Regulatory Guide 1.163.

The changes include definitions regarding the peak calculated primary containment internal pressure for the design basis loss of coolant accident, Pa. The changes also include definitions regarding the maximum allowable primary containment leakage rate, La. Leakage rate acceptance criteria for the Type A, Type B and Type C tests are also specified. In addition, leakage rate acceptance criteria for primary containment air locks are specified. Clarification regarding the provisions of Technical Specification 4.0.B are included. This clarification is provided to ensure that the 25% maximum allowable surveillance extension is not applicable to the test frequencies specified in the Program. In addition, clarification is provided to ensure that the provisions of 4.0.C are included. This clarification is provided to ensure that a 24-hour period is allowed in order to rectify any potential missed surveillances.

5. Technical Specification Bases and Table of Contents

Changes to the Bases regarding 3/4.0, Applicability, 3/4.7.A, PRIMARY CONTAINMENT INTEGRITY, and 3/4.7.B, Primary Containment Leakage, and 3/4.7.C, Primary Containment Air Locks and the Table of Contents, have been proposed accordingly. The proposed changes reflect the aforementioned changes to the Limiting Conditions for Operation and Surveillance Requirements, as previously described. The proposed changes are in accordance with NEI 94.01 and ANSI/ANS-56.8-1994.

ATTACHMENT A
DESCRIPTION AND SAFETY ANALYSIS OF THE PROPOSED CHANGES

LaSalle County

1. Definitions

LaSalle County Technical Specification Definition 1.20, La, specifies the maximum allowable containment leakage rate. To be consistent with the latest guidance regarding adoption of the requirements of Option B to 10 CFR 50, Appendix J, the definition of La is relocated to the Primary Containment Leakage Rate Testing Program, as defined within Technical Specification 6.0, Administrative Controls.

2. Primary Containment Integrity

LaSalle County Technical Specification Surveillance Requirement 4.6.1.1.b restates the requirements of 10 CFR 50 Appendix J for periodic leakage rate testing for Type A tests and therefore must be changed. The remainder of the surveillance requirements address Type B and C testing. These requirements are either encompassed within the requirements specified by Option B to 10 CFR 50, Appendix J, or are encompassed within the proposed changes to Technical Specification Section 6.0, Administrative Controls.

3. Primary Containment Air Locks

Technical Specification 3.6.1.3, Limiting Conditions for Operation includes details regarding the open status of air lock doors. This information is relocated to administrative controls consistent with NUREG-1433. The leakage acceptance criteria are relocated to 6.2.F.

Technical Specification Surveillance Requirements 4.6.1.3.a and 4.6.1.3.b restate the requirements of 10 CFR 50 Appendix J for periodic leakage rate testing for primary containment air locks and therefore must be changed in conjunction with the changes necessitated by Option B to 10 CFR 50 Appendix J. These requirements are either encompassed within the requirements specified by Option B to 10 CFR 50, Appendix J, or are encompassed within the proposed changes to Technical Specification Section 6.0, Administrative Controls regarding the inclusion of the Primary Containment Leakage Rate Testing Program.

4. Containment Isolation Valves

LaSalle County proposes changes to Surveillance Requirements 4.6.3.6.a and 4.6.3.6.b. The proposed changes are made in accordance with the requirements of Option B to 10 CFR 50, Appendix J. Changes proposed for 4.6.3.6.b relocate the periodicity of testing the main steam line isolation valves to the Primary Containment Leakage Rate Testing Program. Annotations regarding Type B and Type C acceptance criteria are correspondingly relocated to the Program. Changes proposed for 4.6.3.6.b relocate the prescribed limits for hydrostatically tested lines to the Primary Containment Leakage

Rate Testing Program. The proposed change to 4.6.3.6 is in accordance with the guidelines specified within NUREG-1433.

5. Administrative Controls

LaSalle County proposes adding the Primary Containment Leakage Rate Testing Program to Technical Specification Section 6.0, Administrative Controls. The Program is defined in accordance with the requirements of 10 CFR 50.54(o) and Option B to 10 CFR 50, Appendix J, as modified by approved exemptions. The program is in accordance with the guidelines contained within Regulatory Guide 1.163.

The changes include definitions regarding the peak calculated primary containment internal pressure for the design basis loss of coolant accident, Pa. The changes also include definitions regarding the maximum allowable primary containment leakage rate, La. Leakage rate acceptance criteria for the Type A, Type B and Type C tests are also specified. In addition, leakage rate acceptance criteria for main steam line isolation valves and primary containment air locks are specified. Clarification regarding the provisions of Technical Specification 4.0.2 are included. This clarification is provided to ensure that the 25% maximum allowable surveillance extension is not applicable to the test frequencies specified in the Program. In addition, clarification is provided to ensure that the provisions of 4.0.3 are included. This clarification is provided to ensure that a 24-hour period is allowed in order to rectify any potential missed surveillances.

6. Technical Specification Bases

Changes to the Bases regarding 3/4.0, Applicability, 3/4.6.1, PRIMARY CONTAINMENT INTEGRITY, and 3/4.6.1.3, Primary Containment Air Locks have been proposed accordingly. The proposed changes reflect the aforementioned changes to the Limiting Conditions for Operation and Surveillance Requirements, as previously described. The proposed changes are in accordance with NEI 94.01 and ANSI/ANS-56.8-1994.

Description of the Current Operating License/Technical Specification Requirement

Dresden/Quad Cities

1. Definitions

Dresden and Quad Cities' definition for PRIMARY CONTAINMENT INTEGRITY references 3.7.B as follows:

"d. The primary containment leakage rates are within the limits of Specification 3.7.B."

2. Primary Containment Integrity and Leakage

Dresden and Quad Cities Surveillance Requirement 4.7.A.1, for the specification 3/4.7.A, PRIMARY CONTAINMENT INTEGRITY, discusses the requirements of 10 CFR 50, Appendix J with respect to penetrations subject to Type B testing.

a. Surveillance Requirement 4.7.A.1 requires the following:

"4.7.A.1 After each closing of each penetration subject to Type B testing, except the primary containment air locks, if opened following Type A or B test, by leak rate testing the seal with gas at $\geq P_a$ (48 psig), and verifying that when the measured leakage rate for these seals is added to the leakage rates determined pursuant to Surveillance Requirement 4.7.B.4 for all other Type B and C penetrations, the combined leakage rate is $\leq 0.60\ L_a$."

b. Dresden and Quad Cities Technical Specification 3/4.7.B restates the requirements of 10 CFR 50 Appendix J for periodic leakage rating testing for Type A, B, and C tests:

a. The Limiting Condition for Operation (LCO) states the limits for Primary Containment leakage rates.

b. The Applicability states the following:

"When PRIMARY CONTAINMENT INTEGRITY is required per Specification 3.7.A."

c. The Action statements reflect restoration of any excess leakage to $\leq$ 0.60 La within 1 hour.

c. Surveillance Requirement 4.7.B states the following:

"4.7.B The primary containment leakage rates shall be demonstrated at the following test schedule and shall be determined in conformance with the criteria, methods and provisions specified in Appendix J of 10 CFR Part 50:"

4.7.B.1, 4.7.B.2, 4.7.B.3 discuss the requirements for Type A Overall Integrated Containment Leakage Rate tests. 4.7.B.4 list the requirements for Type B and C tests and include exemptions from Appendix J. 4.7.B.4 disallows the surveillance test interval extension provided by specification 4.0.B for the surveillance test intervals of 24 months to assure compliance with test intervals required by Appendix J. Surveillance Requirement 4.7.B.4 restates the requirements for Type B and C tests. 4.7.B.4.b includes the provisions for main steam line isolation

valves which is an exemption from Appendix J to 10 CFR Part 50.

d. Surveillance Requirement 4.7.B.4.b states the following:

"Main steam line isolation valves[a] which shall be leak tested at $\geq P_t$ (25 psig)[a] at least once per 18 months, and"

The applicable surveillance Note is as follows:

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a "Exemption from Appendix J to 10 CFR Part 50."

3. Primary Containment Air Locks

a. Technical Specification Limiting Conditions for Operation 3.7.C specifies the minimum OPERABILITY requirements for Primary Containment Air Locks:

"Each primary containment air lock shall be OPERABLE with:

1. Both doors closed except when the air lock is being used for normal transit entry and exit through the containment, then at least one air lock door shall be closed, and

2. An overall air lock leakage rate of $\leq$0.05 La at Pa (48 psig)."

b. Technical Specification Surveillance Requirement 4.7.C.1 restates the requirements of 10 CFR 50 Appendix J for periodic leakage rate testing for primary containment air locks and therefore must be changed in conjunction with the changes necessitated by Option B to 10 CFR 50 Appendix J. These requirements are either encompassed within the requirements specified by Option B to 10 CFR 50, Appendix J, or are encompassed within the proposed changes to Technical Specification Section 6.0, Administrative Controls regarding the inclusion of the Primary Containment Leakage Rate Testing Program.

These requirements are specified as follows:

"1. By conducting an overall air lock leakage test at $\geq$Pa (48 psig) and by verifying that the overall air lock leakage rate is within its limit:

a. Within 72 hours of air lock opening when PRIMARY CONTAINMENT INTEGRITY is required, except when the air lock is being used for multiple entries, then at least once per 72 hours.

b. At least once per 6 months[c], and

c. Prior to establishing PRIMARY CONTAINMENT INTEGRITY following air lock opening."

The applicable surveillance Notes are as follows:

c	"The provisions of Specification 4.0.B are not applicable."

c. The existing requirements for 4.7.C.2 are as follows:

"2. Concurrent with each overall air lock leakage test conducted prior to establishing PRIMARY CONTAINMENT INTEGRITY, by verifying that only one door in each air lock can be opened at a time."

4. Administrative Controls

As previously discussed, Section 6.8.D.5 of Dresden and Quad Cities Technical Specifications provides requirements for the miscellaneous Programs. Dresden and Quad Cities Technical Specifications 6.8.D states the following:

"D. The following programs shall be established, implemented, and maintained:"

5. Technical Specification Bases and Table of Contents

The Bases regarding 3/4.0, Applicability, 3/4.7.A, PRIMARY CONTAINMENT INTEGRITY, and 3/4.7.B, Primary Containment Leakage, and 3/4.7.C, Primary Containment Air Locks and the Table of Contents, are affected by the proposed changes. The current Bases are given in the next section of this submittal.

LaSalle County

1. Definitions

The LaSalle Unit 1 and Unit 2 Technical Specifications (TS) Section 1.0, Definitions, includes the definition of L_a as follows:

"1.20 The maximum allowable primary containment leakage rate, L_a, shall be 0.635% of primary containment air weight per day at the calculated peak containment pressure (P_a = 39.6 psig)."

2. Primary Containment Integrity

The LaSalle TS 3.6.1.1, Primary Containment Integrity, includes the current primary containment leakage Surveillance Requirement 4.6.1.1.b which is as follows:

"b. Perform required visual examinations and leakage rate testing except for primary containment air lock testing and main steam lines through the isolation valves, in accordance with and at the frequency# specified by 10 CFR 50, Appendix J, as modified by approved exemptions.

The overall integrated leakage rate acceptance criterion is $\leq$ 1.0 L_a. The Type B and C combined leakage rate acceptance criterion is $\leq$ 0.60 L_a. However, during the first unit startup following testing performed in accordance with 10 CFR 50, Appendix J, as modified by approved exemptions, the leakage rate acceptance criteria are < 0.60 L_a for the combined Type B and Type C tests, and < 0.75 L_a for the Type A test.

The provisions of Specification 4.0.2 are not applicable to the frequencies specified by 10 CFR 50, Appendix J."

3. Primary Containment Airlocks

The LaSalle TS 3/4.6.1.3, Primary Containment Air Locks Limiting Condition for Operation (LCO) and Surveillance Requirements are as follows:

a. Limiting Condition for Operation 3.6.1.3:

"3.6.1.3 Each primary containment air lock shall be OPERABLE with:

a. Both doors closed except when the air lock is being used for normal transit entry and exit through the containment, then at least one air lock door shall be closed, and

b. An overall air lock leakage rate of less than or equal to 0.05 La at Pa, 39.6 psig."

b. Surveillance Requirements 4.6.1.3 require the primary containment air lock leakage testing and interlock testing as follows:

"a. Within 72 hours following each closing, except when the air lock is being used for multiple entries, then at least once per 72 hours, by verifying seal leakage rate less than or equal to 5 scf per hour when the gap between the door seals is pressurized to greater than or equal to 10 psig.

b. By conducting an overall air lock leakage test at Pa, 39.6 psig, and verifying that the overall air lock leakage rate is within its limit.:

1. After each opening, unless performed within the previous 6 months#, but at least once per 18 months*, and

2. Prior to establishing PRIMARY CONTAINMENT INTEGRITY when maintenance has been performed on the air lock that could affect the air lock sealing capability.*

c. At least once per 6 months by verifying that only one door in each air lock can be opened at a time.**

The provisions of Specification 4.0.2 are not applicable.
* Exemption to 10 CFR 50, Appendix J.
** Except that the inner door need not be opened to verify interlock OPERABILITY when the primary containment is inerted, provided that the inner door interlock is tested within 8 hours after the primary containment has been deinerted."

4. Primary Containment Isolation Valves

LaSalle TS Surveillance Requirements 4.6.3.6.a and 4.6.3.6.b give the specific frequency, required surveillance, and acceptance criteria for the leakage testing of the Main Steam Isolation Valves and hydrostatically tested primary containment isolation valves.

4.6.3.6 "At least once per 18 months:

a. Verify leakage rate through all four main steam lines through the isolation valves is ≤ 100 scfh, when tested at ≥ 25.0 psig.*

b. Verify combined leakage rate of ≤ 1 gpm times the total number of primary containment isolation valves through hydrostatically tested lines that penetrate the primary containment is not exceeded when these isolation valves are tested at 1.1 P_a, ≥ 43.6 psig.*

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* Results shall be excluded from the combined leakage for all penetrations and seals subject to Type B and C tests."

5. Administrative Controls

As previously discussed, Section 6.2 of LaSalle Technical Specifications provides requirements for Programs. LaSalle Technical Specification 6.2.F states the following:

F. "The following programs shall be established, implemented, and maintained:"

6. Technical Specification Bases and Table of Contents

The Bases regarding 3/4.0, Applicability, 3/4.6.1.1, PRIMARY CONTAINMENT INTEGRITY, 3/4.6.1.3, Primary Containment Air Locks, and 3/4.6.3, Primary Containment Isolation Valves, and the Table of Contents, are affected by the proposed changes. The current bases are given in the next section of this submittal.

Bases for the Current Requirements

Dresden/Quad Cities

The Bases for Dresden and Quad Cities Technical Specification 3/4.7.B is as follows:

"The limitations on primary containment leakage rates ensure that the total containment leakage volume will not exceed the value assumed in the accident analyses at the peak accident pressure of 48 psig, Pa. As an added conservatism, the measured overall integrated leakage rate, La, is further limited to less than or equal to 0.75 La during performance of the periodic tests to account for possible degradation of the containment leakage barriers between leakage tests. Periodic testing of the containment boundary is required to verify the allowable leakage rates are met. Generally, these tests are conducted while shutdown and the leakage rates must be verified as acceptable prior to establishing containment integrity. Type B and C tests may, however, be conducted at power and be found to exceed the limit while in the applicable OPERATIONAL MODE(s). A short time frame, consistent with the allowed outage time for PRIMARY CONTAINMENT INTEGRITY, is provided to restore leakage to within its limits. If the leakage is tested individually for each valve in a penetration, closing and locking the other containment isolation valve with an acceptable leakage rate restores PRIMARY CONTAINMENT INTEGRITY. Locking the valve with an acceptable leakage rate is required to assure that the leakage rate is not exceeded due to a single failure that could cause the valve to be re-opened."

"The main steam line isolation valves are tested at lower pressure, per an approved exemption, but the leakage rate is included in the Type B and C test totals. The surveillance testing for measuring leakage rates is consistent with the requirements of Appendix J of 10 CFR 50, with the exception of approved exemptions. (Ref: Exemption Request Approval, Mr. D. B. Vassallo (NRC) to Mr. D. L. Farrar (ComEd), dated June 12, 1984.)."[Note: Dresden's MSIV exemption reference is Mr. D. G. Eisenhut (NRC) to Mr. L. DelGeorge (CECo), dated June 25, 1982.]

The Limiting Condition for Operation for Technical Specification 3/4.7.B provides the limits for Primary Containment leakage rates to assure the leakage assumed in the accident analyses, L_a, is not exceeded. This provides margin to allow for potential degradation until the next Type A test.

Surveillance Requirements 4.7.A.1, 4.7.B.1, 4.7.B.2, 4.7.B.3 and 4.7.B.4 restate the

requirements of Appendix J for the Type A, B, and C tests and/or test frequencies, so that Dresden and Quad Cities are required to conduct Primary Containment Leakage Rate tests by both 10 CFR 50 Appendix J with approved exemptions and Technical Specifications, which includes all of the exemptions currently approved.

The Bases for Dresden and Quad Cities Technical Specification 3/4.7.C is as follows:

> "The limitations on closure and leakage for the primary containment air locks are required to meet the restrictions on PRIMARY CONTAINMENT INTEGRITY and the primary containment leakage rate given in Specifications 3.7.A and 3.7.B. The specification makes allowances for the fact that there may be long periods of time when the air locks will be in a closed and secured position during reactor operation."

LaSalle County

1. The basis for the LaSalle Technical Specification definition of L_a is based on the primary containment leakage rate assumed in the LaSalle accident analyses dose calculations. The allowed leakage for main steam lines through the isolation valves are accounted for in the limiting dose calculation(s) in addition to L_a.

2. The Bases for LaSalle Technical Specification 4.6.1.1.b is as follows:

> "Surveillance Requirement 4.6.1.1.b maintains PRIMARY CONTAINMENT INTEGRITY by requiring compliance with the visual examinations and leakage rate test requirements of 10 CFR 50, Appendix J, as modified by approved exemptions. Failure to meet air lock leakage testing (4.6.1.3) or main steam isolation valve leakage (4.6.3.6.a) does not necessarily result in a failure of this Surveillance Requirement, 4.6.1.1.b. The impact of the failure to meet these Surveillance Requirements 4.6.1.3 and 4.6.1.1.b must be evaluated against the Type A, B, and C acceptance criteria of 10 CFR 50, Appendix J, as modified by approved exemptions. The leakage limits for main steam lines through the isolation valves and leakage test results of Surveillance Requirement 4.6.3.6.a are not included in the total sum of Type B and C tests (approved exemption). As left leakage prior to the first startup after performing a required 10 CFR 50, Appendix J, leakage test is required to be $< 0.60\ L_a$ for combined Type B and C leakage, and $< 0.75\ L_a$ for overall Type A leakage. At all other times between required Type A tests, the acceptance criteria is based on an overall Type A leakage limit of $\leq 1.0\ L_a$. At $\leq 1.0\ L_a$ the offsite dose consequences are bounded by the assumptions of the safety analysis. The combined Type B and C leakage remains as $\leq 0.60\ L_a$ between scheduled tests, in accordance with Appendix J."
>
> "The Frequency is required by 10 CFR 50, Appendix J, as modified by approved exemptions. Thus, 4.0.2 (which allows Frequency extensions) does not apply to Surveillance Requirement 4.6.1.1.b."

3. The Bases for LaSalle Technical Specification 3/4.6.1.3 is as follows:

> The limitation on closure and leak rate for the primary containment air locks are required to meet the restrictions on PRIMARY CONTAINMENT INTEGRITY and the primary containment leakage rate given in Specification 3/4.6.1.1. The specification makes allowances for the fact that there may be long periods of time when the air locks will be in a closed and secured position during reactor operable. Only one closed door in each air lock is required to maintain the integrity of the containment.

4. The Bases for LaSalle Technical Specification 4.6.3.6 is as follows:

> "This specification provides assurance that the Primary Containment Isolation Valves (PCIVs) will perform their designed safety functions to control leakage from the primary containment during accidents."
>
> "Surveillance Requirement 4.6.3.6.a verifies leakage through all four main steam lines is ≤ 100 scfh when tested at ≥ P_t (25.0 psig). The transient and accident analyses are based on leakage at the specified leakage rate. The leakage rate for main steam lines through the isolation valves must be verified to be in accordance with the leakage test requirements of 10 CFR 50, Appendix J, as modified by approved exemptions. A Note has been added to this Surveillance Requirement requiring the results to be excluded the total of Type B and Type C tests. This ensures that leakage rate for main steam lines through the isolation valves is properly accounted for in accordance with an approved exemption. The frequency is "at least once per 18 months" is in accordance with an approved exemption."
>
> "Surveillance Requirement 4.6.3.6.b test of hydrostatically tested lines provides assurance that the assumptions of UFSAR Section 6.2 are met. The combined leakage rates must be demonstrated in accordance with the leakage rate test at a frequency of "at least once per 18 months". A Note has been added to this Surveillance Requirement requiring the results to be excluded the total of Type B and Type C tests. This is in accordance with 10 CFR 50, Appendix J, and approved exemptions."

Description of the Need for Amending the Technical Specification

Technical Specification changes to the Dresden, Quad Cities and LaSalle County Limiting Conditions for Operations, Surveillance Requirements and Administrative Controls are necessary because current requirements duplicate the leakage rate testing requirements and acceptance criteria of 10 CFR 50, Appendix J. With the revised Option B to 10 CFR 50, Appendix J, potential confusion exists with regard to specific applicability of the revised rule. Without the approval of the requested amendments to the Technical Specifications, Dresden, Quad Cities and LaSalle County, will be unable to implement Option B to 10 CFR 50, Appendix J.

ATTACHMENT A
DESCRIPTION AND SAFETY ANALYSIS OF THE PROPOSED CHANGES

In order to simplify implementation of the aforementioned rule changes and/or future exemptions, Dresden and Quad Cities propose to delete Technical Specification 3/4.7.B. As previously discussed, the requirements specified in 3/4.7.B, Primary Containment Leakage, are redundant to the requirements specified in proposed 3/4.7.A. This is in accordance with the guidelines specified in NUREG-1433. Any specific changes to the location of MSIV testing requirements are administrative in nature due to their relocation to the Primary Containment Isolation Valve requirements (TS 3/4.7.D). In addition, the proposed changes are redundant to those requirements delineated within Option B to 10 CFR 50, Appendix J.

LaSalle County received approval by the NRC staff for a corresponding change within a previous amendment request. As such, the LaSalle County Primary Containment Leakage requirements (3/4.6.1.2) have been deleted. In addition, Dresden and Quad Cities Technical Specification 3/4.7.B, Primary Containment Leakage, and Surveillance Requirements 4.7.A.1 and 4.7.C.1 are proposed to be modified such that required leakage rate testing will be performed in accordance with Option B to 10 CFR 50, Appendix J and approved exemptions. LaSalle County Technical Specification 4.6.1.1.b, 4.6.1.3.a and 4.6.1.3.b are similarly being modified. In addition, LaSalle County Surveillance Requirement 4.6.3.6 is also being revised. The proposed changes will simplify the implementation of any other changes to the Primary Containment specifications as the guidelines of NUREG-1433 are incorporated therein.

Description of the Amended Technical Specification Requirement

Dresden/Quad Cities

1. Definitions

   Dresden and Quad Cities definition for PRIMARY CONTAINMENT INTEGRITY references 3.7.B. Due to the aforementioned changes, this cross-reference is modified to correctly cross-reference 3.7.A.

   Changes to Section 1.0, Definitions (in part) are proposed as follows: (New wording is in italics.)

   "PRIMARY CONTAINMENT INTEGRITY (PCI) shall exist when:

   d. The primary containment leakage rates are *maintained* within the limits of Specification *3.7.A.*"

2. Primary Containment Integrity and Leakage

   Dresden and Quad Cities Technical Specification 3/4.7.B is being deleted and replaced with a new Surveillance Requirement under Technical Specification 3/4.7.A, PRIMARY CONTAINMENT INTEGRITY. The following are the proposed changes needed to implement deletion of specification 3/4.7.B.

a. The current primary containment leakage specifications are being replaced with new Surveillance Requirement 4.7.A.1, which is proposed as follows:

1. "Perform required visual examinations and leakage rate testing except for containment air lock testing in accordance with and at the frequency specified by the Primary Containment Leakage Rate Testing Program."

b. Dresden and Quad Cities Technical Specification requirements (Limiting Conditions for Operation and Surveillance Requirements) for 3/4.7.B, Primary Containment Leakage, are being deleted in their entirety. The proposed requirements shall be so noted.

c. Current Specification 4.7.B.4.b is relocated to 4.7.D.6. The revised Surveillance Requirement is specified as follows:

"6. At the frequency specified by the Primary Containment Leakage Rate Testing Program, verify leakage for any one main steam line isolation valve when tested at P_t (25 psig) is ≤11.5 scfh."

3. Primary Containment Air Locks:

a. Dresden and Quad Cities Limiting Conditions for Operation (LCO), 3.7.C is being revised to delete the specific leakage acceptance criterion and the closure status of the air lock door. The revised LCO reads as follows:

"C. Primary Containment Air Locks

Each primary containment air lock shall be OPERABLE."

b. Dresden and Quad Cities Surveillance Requirement 4.7.C.1 is being revised to be consistent with NUREG-1433 and to reflect changes associated with Option B to 10 CFR 50, Appendix J. The proposed 4.7.C.1 is as follows:

"C. Primary Containment Air Locks

Each primary containment air lock shall be demonstrated OPERABLE:

1. *By performing required primary containment air lock leakage rate testing in accordance with and at the frequency specified by the Primary Containment Leakage Rate Testing Program.*[(c)(d)]"

c. Dresden and Quad Cities Surveillance Requirement 4.7.C.1, footnote (c) is being deleted and replaced with two footnotes to be consistent with NUREG-1433 and to reflect changes associated with Option B to 10 CFR 50, Appendix J. Proposed 4.7.C.1, footnote (c) and footnote (d) are specified below:

"c *An inoperable air lock door does not invalidate the previous successful performance of the overall air lock leakage test.*"

"d *Results shall be evaluated against acceptance criteria applicable to Specification 4.7.A.1.*"

d. Dresden and Quad Cities Surveillance Requirement 4.7.C.2 is being revised to be consistent with NUREG-1433 and to reflect changes associated with Option B to 10 CFR 50, Appendix J. The proposed 4.7.C.2 is as follows:

"2. *At least once per 6 months,* by verifying that only one door in each air lock can be opened at a time.[(e)]"

e. Dresden and Quad Cities Surveillance Requirement 4.7.C.2 is being revised by the addition of footnote (e) to be consistent with NUREG-1433 and to reflect changes associated with Option B to 10 CFR 50, Appendix J. The proposed 4.7.C.2, footnote (e) is as follows:

"e *Only required to be performed upon entry into primary containment air lock when the primary containment is de-inerted.*"

4. Administrative Controls

Dresden and Quad Cities propose to add a new program as Section 6.8.D.5 to the Technical Specifications.

"*6.8.D.5 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, Pa, is 48 psig.

The maximum allowable primary containment leakage rate, La, at Pa, is 1.6% [Note: Quad Cities value = 1.0%] of primary containment air weight per day.

Leakage rate acceptance criteria are:

a. Primary containment overall leakage rate acceptance criterion is ≤ 1.0 La. During the first unit startup following testing in accordance with this program, the leakage rate acceptance criteria are ≤ 0.60 La for the combined Type B and Type C tests,

and ≤ 0.75 La for Type A tests.

b. Air lock testing acceptance criteria is the overall air lock leakage rate is ≤ 0.05 La when tested at ≥ Pa.

The provisions of 4.0.B do not apply to the test frequencies specified in the Primary Containment Leakage Rate Testing Program.

The provisions of 4.0.C are applicable to the Primary Containment Leakage Rate Testing Program."

5. Bases Changes and Table of Contents

Based upon the aforementioned changes, corresponding changes are proposed to the Technical Specification Bases.

LaSalle

1. Definitions - The LaSalle Unit 1 and Unit 2 Technical Specifications (TS) Section 1.0, Definitions, includes the definition of L_a, which is being deleted to reflect changes required to control leakage testing administratively in accordance with Option B. Definition 1.20 is proposed to be changed to "Deleted" as follows to avoid renumbering of the remaining definitions:

"1.20 *Deleted*"

2. Primary Containment Integrity - The LaSalle TS Surveillance Requirement 4.6.1.1.b is proposed as follows:

4.6.1.1.b. "Perform required visual examinations and leakage rate testing except for primary containment air lock testing and main steam lines through the isolation valves, in accordance with and at the frequency specified by *the Primary Containment Leakage Rate Testing Program.*

Note # concerning the inapplicability of specification 4.0.2 to the testing frequencies of Appendix J is being relocated to the Primary Containment Leakage Rate Testing Program and the program description in Tech Spec Administrative Controls section 6.2, Plant Operating Procedures and Programs.

3. Primary Containment Airlocks - The LaSalle TS 3/4.6.1.3, Primary Containment Air Locks proposed Limiting Condition for Operation (LCO) and leakage testing Surveillance Requirement are as follows:

a. Limiting Conditions for Operation (LCO), 3.6.1.3 is being revised to delete the specific leakage acceptance criterion and the closure status of the air lock door.

The revised LCO reads as follows with parts a. and b. deleted:

"3.6.1.3 The primary containment air lock shall be OPERABLE."

b. Surveillance Requirement 4.6.1.3.a and 4.6.1.3.b are being combined in to a new Surveillance Requirement based on the establishment of the Primary Containment Leakage Rate Testing Program and the Surveillances are renumbered as follows:

a. "*By performing required primary containment air lock leakage rate testing in accordance with and at the frequency specified by the Primary Containment Leakage Rate Testing Program* ,#.*

b. "At least once per 6 months by verifying that only one door in each air lock can be opened at a time.**"

Current note # concerning the inapplicability of specification 4.0.2 to the testing frequencies of Appendix J is being relocated to the Primary Containment Leakage Rate Testing Program and the program description in Technical Specification Administrative Controls Section 6.2, Plant Operating Procedures and Programs. Current note * is being relocated to the Primary Containment Leakage Rate Testing Program. Current note ** is being revised to be consistent with NUREG-1433. The new applicable surveillance Notes are as follows:

#Results shall be evaluated against criteria applicable to Surveillance Requirement 4.6.1.1.b.

**An inoperable air lock door does not invalidate the previous successful performance of the overall air lock leakage test.*

*** Only required to be performed upon entry into primary containment air lock when the primary containment is de-inerted.*

4. Primary Containment Isolation Valves - LaSalle TS Surveillance Requirements 4.6.3.6.a and 4.6.3.6.b give the specific frequency, required surveillance, and acceptance criteria for the leakage testing of the Main Steam Isolation Valves and hydrostatically tested primary containment isolation valves. Note * regarding an approved exemption to 10 CFR 50 Appendix J is being relocated to the Primary Containment Leakage Rate Testing Program where approved exemptions will be located. A Technical Specification amendment request has been submitted that also affects Surveillance Requirement 4.6.3.6.a. The requested change affects the allowed leakage rate through all four main steam lines through the isolation valves changing the leakage rate from ≤ 100 scfh to ≤ 400 scfh at ≥ 25.0 psig (G. Benes letter to U.S. NRC, dated August 28, 1995). The following proposed change is compatible with the aforementioned changes.

4.6.3.6 "At *the frequency specified by the Primary Containment Leakage Rate Testing Program*:

a. "Verify leakage rate through all four main steam lines through the isolation valves is ≤ 100 scfh, when tested at ≥ 25.0 psig.

b. "Verify combined leakage rate through hydrostatically tested lines that penetrate the primary containment is *within limits*."

5. Administrative Controls

LaSalle proposes adding a new program as Section 6.2.F.7 to the Technical Specifications.

"6.2.F.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 ≤ 1.0 L_a. During the first unit startup following testing in accordance with this program, the leakage rate acceptance criteria are ≤ 0.60 L_a for the combined Type B and Type C tests, and ≤ 0.75 L_a for Type A tests.

b. Air lock testing acceptance criteria are:

1) Overall air lock leakage rate is ≤ 0.05 L_a when tested at ≥ P_a.

2) For each door, the seal leakage rate is ≤ 5 scf per hour when the gap between the door seals is pressurized to ≥ 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."

6. Bases Changes and Table of Contents

Based upon the aforementioned changes, corresponding changes are proposed to the Technical Specification Bases and the Table of contents.

Bases for the Amended Technical Specification Request

Dresden/Quad Cities

1. Definitions

The proposed change regarding the cross-reference to Specification 3.7.A is necessitated by the elimination of Specification 3.7.B. The proposed changes to the Definition of PRIMARY CONTAINMENT INTEGRITY is administrative in nature and as such, does not adversely affect the safe operation of the plant.

2. Primary Containment Integrity and Leakage

Dresden and Quad Cities Technical Specification requirements for Primary Containment Leakage, in conjunction with Surveillance Requirements duplicates the Requirements of 10 CFR Part 50, Appendix J and approved exemptions from Appendix J. These specifications include the plant specific design pressure, P_a, and the design leakage, L_a. The new Surveillance Requirements that replace the existing specifications, provide reference to the requirements for primary containment leakage testing requirements and frequencies without repeating the details contained in Option B to 10 CFR 50, Appendix J. The various aspects of this change are discussed as follows:

a. Bases for deletion and relocation:

10 CFR 50.36(c) requires that Technical Specifications include items in five specific categories including safety limits; limiting safety system settings; limiting control settings; limiting conditions for operation; surveillance requirements; design features; and administrative controls. However, the rule does not specify the particular requirements to be included in a plant's Technical Specifications. The NRC has developed guidance criteria, as described in the "Final Policy Statement on Technical Specifications Improvements for Nuclear Power Reactors," published in Federal Register 58 FR 39132 (dated July 22, 1993), which can be used to determine which of the design conditions and associated surveillance provisions need to be located in the Technical Specifications.

The policy statement requires that Technical Specifications must include those

conditions or limitations on reactor operation which are "necessary to obviate the possibility of an abnormal situation or event giving rise to an immediate threat to the public health and safety." The guidance criteria are summarized as follows:

1) Detection of abnormal degradation of the reactor coolant pressure boundary;

2) Conditions for bounding design basis accident and transient analyses;

3) Primary success paths to prevent or mitigate design basis accidents and transients; and

4) Functions determined to be important to risk or operating experience.

The policy statement recognized that items which are relocated from the Technical Specifications to licensee-controlled documents such as the updated FSAR would be controlled in accordance with the requirements of 10 CFR 50.59, "Changes, tests and experiments." 10 CFR 50.59 provides criteria to determine when planned facility or operating changes require prior NRC approval for any unreviewed safety questions. Also, NRC inspection and enforcement of licensees enable the NRC to monitor facility changes and licensee adherence to UFSAR commitments and to take any remedial action that may be appropriate. The 10 CFR 50.59 change process and the 10 CFR 50.12 exemption process assure proper control of changes to the primary containment leakage testing as described in the UFSAR.

b. Bases for the Proposed Technical Specifications for Primary Containment Leakage:

The deleted specifications are replaced by proposed Surveillance Requirements 4.7.A.1 and 4.7.C.1. Compliance with the requirements of 10 CFR 50, Appendix J, are still assured. Technical Specification Section 6.8 will include specifics concerning Dresden or Quad Cities' compliance with the requirements of Option B to 10 CFR 50, Appendix J, and the exemptions that have been approved by the NRC. This change is consistent with both NUREG 1433, Revision 1, but without relaxation of the current leakage acceptance criteria in the Dresden and Quad Cities Technical Specifications. The NRC Policy Statement guidance criteria is satisfied concerning the removal of these specifications. The primary containment leakage rates are used as initial conditions in the Design Basis Accident (DBA) radiological evaluations, according to Regulatory Guide 1.3.

However, since leak rates cannot be monitored and controlled during power operation, they are not considered process variables and therefore are not suitable for a limiting condition for operation. Thus, retention of the following in the Dresden or Quad Cities Technical Specifications, with respect to primary containment leakage testing, satisfies the requirement to assure that the initial conditions concerning the DBA radiological evaluations are maintained:

1) A Surveillance Requirement in specification 4.7.A.1.

2) The change to the definition of Primary Containment Integrity concerning primary containment leakage.

3) Reference to Option B to 10 CFR 50, Appendix J, and approved exemptions which specify the test methods and frequencies for primary containment leakage testing requirements in the Administrative Controls of the Technical Specifications.

3. Primary Containment Air Locks

The requirements of Option B to 10 CFR 50, Appendix J revise the surveillance requirements regarding containment air locks. Under the revised rule, containment air locks shall be tested at an internal pressure of not less than Pa. Subsequent periodic tests shall be performed at a frequency of at least once per 30 months. When containment integrity is required, air lock door seals should be tested within 7 days after each containment access. For periods of multiple containment entries where the air lock doors are routinely used for access more frequently than once every 7 days (e.g., shiftly or daily inspection tours of the containment), door seals may be tested once per 30 days during this time period.

The relocation of the details that comprise this LCO to administrative controls is consistent with NUREG-1433. The leakage acceptance criteria are relocated to 6.8.D.5; as such, this change is administrative in nature and does not adversely affect the safe operation of the facility.

The requirements for both doors to remain closed are relocated to Administrative Controls. Should only one door remain closed, the safety design of the containment and its air locks still provide a sufficiently tight leak barrier for any postulated events. As such, existing plant safety margins are not adversely affected by the proposed changes.

The specific surveillance requirements specified in 4.7.C.1 are encompassed within Technical Specification 6.8.D.5. The Primary Containment Leakage Rate Testing Program as defined within 6.8.D.5 provides reference to Option B to 10 CFR 50, Appendix J. Consistent with the intent of NUREG-1433, surveillance procedural details are inappropriate for inclusion within the Technical Specifications. Such details are redundant to those specified within Option B to 10 CFR 50, Appendix J. The appropriate cross-reference to the Primary Containment Leakage Rate Testing Program within proposed 4.7.C.1 ensures sufficient information is retained within the Technical Specifications. Proposed footnote (c) is consistent with NUREG-1433 requirements and clarifies that a single inoperable air lock door does not invalidate the overall air lock leakage test. In conjunction with proposed footnote (d), the proposed clarification ensures that OPERABILITY for the overall air lock opening is maintained by comparison against appropriate acceptance criteria. Because the proposed changes are

consistent with the current plant configuration, NUREG-1433 and Option B to 10 CFR 50, Appendix J, the proposed changes do not adversely affect existing plant safety margins.

Dresden and Quad Cities Surveillance Requirement 4.7.C.2 is being revised to eliminate the specific cross-reference regarding concurrence with each overall air lock leakage test conducted prior to establishing PRIMARY CONTAINMENT INTEGRITY. Specific procedural details are inconsistent with the intent of NUREG-1433 and as such inappropriate for inclusion within the Technical Specifications. Surveillance Requirement 4.7.C.2, footnote (e) is being revised to be consistent with NUREG-1433 and to reflect changes associated with Option B to 10 CFR 50, Appendix J. Proposed 4.7.C.2, footnote (e) clarifies that air lock interlock testing and the subsequent leakage test should only be performed when primary containment is de-inerted. This clarification ensures that testing of the air lock is not attempted on an inner door when the primary containment is inerted. If the inner door were to be inoperable and the door were subsequently tested, the consequences could be potentially severe. As such, the proposed notation is consistent with current plant operating practices and maintains existing plant safety margins.

4. Administrative Controls

Option B to 10 CFR 50, Appendix J provides performance-based measures for performing leakage rate testing requirements. The performance criteria for Type A testing has been established by Option B to be less than 1.0 La. Type A test intervals are established as every 48 months. Extension in Type A test intervals are allowed based upon two consecutive successful Type A tests and consideration of various performance factors. Type A testing interval frequency may be increased to at least once per 10 years.

Type B and Type C test intervals are established as every 30 months. Extensions in Type B and Type C test intervals are allowed based upon completion of two consecutive periodic As-found tests where the results of each test are within administrative limits. Intervals may be increased up to 120 months (except for containment air locks and valves).

Containment air locks shall be tested at Pa. Subsequent period tests shall be performed at a frequency of at least once per 30 months. When containment integrity is required, air lock door seals should be tested within 7 days after each containment access. For periods of multiple containment entries where the air lock doors are routinely used for access more frequently than once every 7 days (e.g., shiftly or daily inspection tours of the containment), door seals may be tested once per 30 days during this time period.

The proposed addition of 6.8.D.5 to the Administrative Controls of the Technical Specifications ensures compliance with Option B to 10 CFR 50, Appendix J. All approved exemptions from 10 CFR 50, Appendix J are specified therein. In addition,

plant-specific acceptance criteria are designated within 6.8.D.5. As such, NRC review and approval is mandated prior to deviation from such commitments. Therefore, the proposed changes are consistent with the implementation of Option B to 10 CFR 50, Appendix J.

5. Bases and Table of Contents

The proposed changes to the Technical Specification Bases reflect the aforementioned changes. The changes to the Bases are administrative in nature and do not affect the operation of the plant as described in the plant's UFSAR.

LaSalle

1. Definitions

The LaSalle Technical Specifications Section 1.0, Definitions, includes the definition of L_a, which is being deleted to reflect changes required to control leakage testing administratively in accordance with Option B. Definition 1.20 is proposed to be changed to "Deleted" as follows to avoid renumbering of the remaining definitions. The value of L_a is being added to TS section 6.2.F as part of the program description. Therefore, Definition 1.20 (L_a) serves no purpose, is no longer required, and thus is an administrative change.

2. Primary Containment Integrity

Compliance with the requirements of 10 CFR 50, Appendix J, are still assured. Technical Specification Section 6.2 will include specifics concerning LaSalle's compliance with the requirements of Option B to 10 CFR 50, Appendix J, and the leakage rate exemptions that have been approved by the NRC. The referenced Primary Containment Leakage Rate Testing Program establishment, implementation and maintenance is required by the proposed addition of the program description in section 6.2.F.7. Specific exemptions, other than the leakage criteria for main steam lines through the isolation valves, will be controlled in the UFSAR and the Primary Containment Leakage Rate Testing Program.

3. Primary Containment Air Locks

The requirements of Option B to 10 CFR 50, Appendix J revise the surveillance requirements regarding containment air locks. Under the revised rule, containment air locks shall be tested at an internal pressure of not less than a specified pressure prior to a preoperational Type A test. Subsequent periodic tests shall be performed at a frequency of at least once per 30 months. When containment integrity is required, air lock door seals should be tested within 7 days after each containment access. For periods of multiple containment entries where the air lock doors are routinely used for access more frequently than once every 7 days (e.g., shiftly or daily inspection tours of

the containment), door seals may be tested once per 30 days during this time period.

a. The relocation of the details that comprise this LCO to administrative controls is consistent with NUREG-1433. The leakage acceptance criteria are relocated to Technical Specification Section 6.2.F; as such, this change is administrative in nature and does not adversely affect the safe operation of the facility.

The requirements for both doors to remain closed are relocated to Administrative Controls. Should only one door remain closed, the safety design of the containment and its air locks still provide a sufficiently tight leak barrier for any postulated events. As such, existing plant safety margins are not adversely affected by the proposed changes.

b. The specific surveillance requirements specified in 4.6.1.3 are encompassed within Technical Specification 6.2.F. The Primary Containment Leakage Rate Testing Program as defined within Section 6.2.F provides reference to Option B to 10 CFR 50, Appendix J. Consistent with the intent of NUREG-1433, surveillance procedural details are inappropriate for inclusion within the Technical Specifications. Such details are redundant to those specified within Option B to 10 CFR 50, Appendix J. The appropriate cross-reference to the Primary Containment Leakage Rate Testing Program within proposed 4.6.1.3 ensures sufficient information is retained within the Technical Specifications. Proposed footnote # is consistent with NUREG-1433 requirements and clarifies that a single inoperable air lock door does not invalidate the overall air lock leakage test. In conjunction with proposed footnote *, the proposed clarification ensures that OPERABILITY for the overall air lock opening and Primary Containment Integrity is maintained by comparison against appropriate acceptance criteria. Because the proposed changes are consistent with the current plant configuration, NUREG-1433 and Option B to 10 CFR 50, Appendix J, the proposed changes do not adversely affect existing plant safety margins.

c. LaSalle Surveillance Requirement 4.6.1.3.c, footnote ** is being revised to be consistent with NUREG-1433 and to reflect changes associated with Option B to 10 CFR 50, Appendix J. Proposed 4.6.1.3.b, footnote ** clarifies that air lock interlock testing should only be performed when primary containment is de-inerted. This clarification ensures that testing of the air lock is not attempted on an inner door when the primary containment is inerted. If the inner door were to be inoperable and the door were subsequently tested, the consequences could be potentially severe. The proposed changes to current footnote ** are encompassed within the Primary Containment Leakage Rate Program and are consistent with the requirements of 10 CFR 50, Appendix J. As such, the proposed notation is consistent with current plant operating practices and maintains existing plant safety margins.

4. Administrative Controls

LaSalle proposes adding the Primary Containment Leakage Rate Testing Program to Technical Specification Section 6.2.F. The Program is defined in accordance with the requirements of 10 CFR 50.54(o) and Option B to 10 CFR 50, Appendix J, as modified by approved exemptions. The program is in accordance with the guidelines contained within Regulatory Guide 1.163, as modified by approved exemptions.

The changes include definitions regarding the peak calculated primary containment internal pressure for the design basis loss of coolant accident, Pa. The changes also include definitions regarding the maximum allowable primary containment leakage rate, La. Leakage rate acceptance criteria for the Type A, Type B and Type C tests are also specified. In addition, leakage rate acceptance criteria for primary containment air locks are specified. Clarification regarding the provisions of Technical Specification 4.0.2 are included. This clarification is provided to ensure that the 25% maximum allowable surveillance extension is not applicable to the test frequencies specified in the Program. In addition, clarification is provided to ensure that the provisions of 4.0.3 are included. This clarification is provided to ensure that a 24-hour period is allowed in order to rectify any potential missed surveillances.

5. Bases and Table of Contents

The proposed changes to the Technical Specification Bases reflect the aforementioned changes. The changes to the Bases are administrative in nature and do not affect the operation of the plant as described in the plant's UFSAR.