

# REGULATORY DOCKET FILE COPY

AUG 8 1979

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Docket Nos. 50-373/374  
MS 24-12

MEMORANDUM FOR: S. A. Varga, Acting Assistant Director  
for Light Water Reactors  
Division of Project Management

FROM: J. P. Knight, Assistant Director  
for Engineering

SUBJECT: COMMONWEALTH EDISON COMPANY, LA SALLE COUNTY STATION, UNIT  
NOS. 1 AND 2, DOCKET NUMBERS 50-373/374 (OL)

Plant Name: La Salle County Station, Unit Nos. 1 and 2

Suppliers: General Electric; Sargent and Lundy

Licensing Stage: OL

Docket Numbers: 50-373/374

Responsible Branch and Project Manager: LMR 3; A. Bourneia

Reviewer: M. R. Henn

Requested Completion Date: August 13, 1979

Description of Task: Section XI Exemption of ECCS Components Based on Control  
of Water Chemistry

Review Status: Applicant's Response Required

The Materials Integrity Section of the Materials Engineering Branch, Division of Systems Safety, has reviewed the use of the Section XI "chemistry control" exemption in the preservice inspection (PSI) program for La Salle County Station. Paragraph IMC-1220(c) of Section XI of the ASME Code, 1974 Edition, permits the exemption from examination of ECCS components provided that the control of water chemistry is verified by periodic sampling and testing to minimize corrosive effects, particularly stress corrosion. The "chemistry control" provision was deleted from paragraph IMC-1220 in the 1977 Edition of Section XI because practical evaluation, review and acceptance standards could not be defined. Similarly, it is our position that water chemistry control to minimize stress corrosion described in paragraph IMC-1220(c) of Section XI, 1974 Edition, is not an acceptable basis for exempting ECCS components from inservice examination. Paragraph IMC-1220(b) of Section XI, Summer 1978 Addenda, does not permit the exemption from examination of components in the ECCS and the residual heat removal systems (RHRS) that operate below 275 psig or below 200°F. Similarly, it is our position that low operating pressure and temperature is not an acceptable basis for exempting ECCS and RHRS components from inservice examination.

To provide guidance to La Salle before the preservice examination is completed and before the ISI program is submitted, our position regarding paragraph IMC-1220(c) was discussed in telephone conversations on July 12, 1979 and July 24, 1979 between representatives of Commonwealth Edison, the Project

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