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October 31, 1980

Mr. B. J. Youngblood, Chief
Licensing Branch No. 1
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Subject: LaSalle County Station Units 1 and 2
Environmental Qualification Report
Safety-Related Equipment In Harsh
Environments
NRC Docket Nos. 50-373 and 50-374

- References (a): D. F. Ross, Jr. Letter to Operating License Applicants; dated February 21, 1980.
- (b): I.E. Bulletin 79-01B, Enclosure 4; J. G. Keppler letter to C. Reed dated January 16, 1980.
- (c): I.E. Bulletin 79-01B, Supplement 2; J. G. Keppler letter to C. Reed dated September 30, 1980.
- (d): I.E. Bulletin 79-01B, Supplement 3; J. G. Keppler letter to C. Reed dated October 24, 1980.

Dear Mr. Youngblood:

Commonwealth Edison submits for your review the environmental qualification report for Safety-related electrical equipment in a harsh environment for LaSalle County Station. This report responds to the request for information contained in Reference (a). As you are aware, intensive discussions have taken place between the NRC and the utility industry over the past 24 months on the subject of environmental qualification of equipment. Numerous meetings, I.E. Bulletins and regional I.E. seminars have been conducted to clarify the specific criteria expected by the NRC Staff to be satisfied in performing this assessment of qualification.

LaSalle County Units 1 and 2, in reliance on comments made by the NRC representatives at the I.E. Region III seminar conducted on July 16, 1980, and as confirmed by discussions between the BWR Licensing Review Group (LRG) and the NRR Staff (Mr. Z. Rosztoczy) in July, 1980, have conducted this assessment and developed the subject report based on the DOR Guidelines contained in Reference (b). The intention to pursue this approach was formally documented by the BWR LRG with reference to LaSalle County Station in the LRG position dated July 24, 1980. This written position was discussed with the Equipment Qualification Branch (Mr. Rosztoczy) and no adverse comments have been documented. It is our belief, therefore, that the LaSalle County report is responsive to the NRC request for information.

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belief, therefore, that the LaSalle County report is responsive to the NRC request for information.

In this regard, the assessment of LaSalle County documented in the enclosed report demonstrates conformance of substantially all safety-related electrical equipment in harsh environments as required by the DOR Guidelines. Those exceptions, which are documented in Section M.7. of the report are also expected to conform after the review of as yet unreceived documentation has been completed.

It is acknowledged that Supplement 2 to I.E. Bulletin 79-01B (Reference (c)) indicates that OL plants with CP SER before 7-1-74, such as LaSalle County Station, will use NUREG-0588 Cat. II as the assessment basis. However, the discussion which preceded demonstrates the inconsistency of this prescription for LaSalle County. Moreover, the statement in Supplement 2 that "the minimum standards set by either of the two documents (i.e., DOR Guidelines and NUREG-0588 Cat. II) are equally available to ORs and NTOLs" supports the use of the DOR Guidelines for LaSalle County. Notwithstanding this additional justification for the use of the DOR guidelines, a supplemental assessment against NUREG-0588 Cat. II of safety-related electrical equipment in harsh environments has been initiated for LaSalle County. Preliminary results of this assessment indicate that a majority of the equipment reviewed can be demonstrated to satisfy the Category II criteria based on existing documentation. A substantial majority of the remaining equipment is expected to be shown qualified to the Category II criteria without the need for any requalification testing. This supplemental assessment will be completed in the same time frame as the review of the remaining safety-related equipment in other than harsh environments.

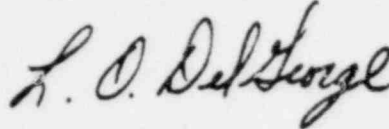
It is expected that the LaSalle County environmental qualification assessment for all safety-related equipment will be completed and the results documented in February, 1981. This will include the additional information discussed in Supplement 3 of Bulletin 79-01B (Reference (d)).

In summary, the enclosed report demonstrates the qualification of safety-related equipment in harsh environments at LaSalle County Station in accordance with the criteria discussed in the DOR Guidelines.

Three (3) copies of the subject report are enclosed for your review. An additional seven (7) copies are being printed and should be available for your review the week of November 2, 1980. This report will also be formally docketed as Appendix M to the LaSalle County FSAR.

If you have any questions in this regard, please address them to this office.

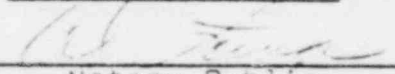
Very truly yours,



L. O. DelGeorge
Nuclear Licensing Administrator
LaSalle County Station

cc: RIII Resident Inspector - LaSalle

SUBSCRIBED and SWORN to
before me this 5th day
of October, 1980



Notary Public