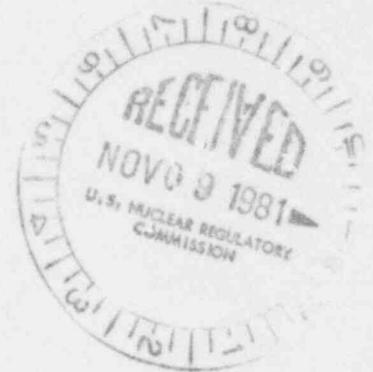




**Commonwealth Edison**  
 One First National Plaza, Chicago, Illinois  
 Address Reply to: Post Office Box 767  
 Chicago, Illinois 60690

November 6, 1981

Mr. A. Schwencer, Chief  
 Licensing Branch #2  
 Division of Licensing  
 U.S. Nuclear Regulatory Commission  
 Washington, D.C. 20555



Subject: LaSalle County Station Unit 1  
 Completion of Preoperational  
 Test Program  
NRC Docket No. 50-373

References (a): LSCS FSAR Chapter 14

(b): LSCS Proposed Technical Specifications  
 dated October 14, 1981.

Dear Mr. Schwencer:

Reference (a) described the LaSalle County Station preoperational and startup test program. Commonwealth Edison Company's original intentions were to complete the entire preoperational test program prior to fuel load.

However, it has become apparent that certain portions of a relatively small number of preoperational test and system descriptions have become the controlling items for fuel load. The delays in completing these tests were due to a variety of design, delivery and installation problems.

Commonwealth Edison has reviewed the remaining preoperational testing, considering both the safety aspects of the individual systems and the anticipated system completion dates. Several of the systems and subsystems involved have been determined to have no impact on plant safety during shutdown and fuel loading conditions. This determination is based on the proposed Technical Specifications (Reference (b)), and, where the Technical Specification have no specific requirements, prudent judgement.

Attachment A presents the results of Commonwealth Edison's review and justification that these systems and subsystems should not be required to be tested or operable as a prerequisite for fuel load. It is requested that approval be granted to defer the completion of the preoperational tests listed on Attachment A beyond fuel load. With the exception of Process Radiation Monitoring, no parts of any of the systems listed are required, and it is proposed that no test evaluation will be prepared until the test is completed. For the process Radiation Monitoring System, a test evaluation will be

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completed prior to fuel load to ensure the adequacy of the portions of the system required to support fuel load. It should be noted that in a majority of cases, it is anticipated that the physical testing will be completed prior to fuel load. The delay in test completion will allow additional time to ensure a thorough evaluation and review of the test results. Also included on Attachment A are the appropriate milestones in the Startup Test Program by which the tests and test evaluations must be completed.

A review of Chapter 14 of the FSAR has revealed that several of the startup test abstracts list, as an Initial Condition, "All construction and preoperational testing completed." Approval by the NRC to defer completion of preoperational tests will include authorization to deviate from this startup test prerequisite until the specified milestone is attained.

It is requested that your consideration be given to this matter as soon as possible so that site resources can be allocated to complete the necessary task.

If there are any questions in this regard, please contact this office.

Very truly yours,

*C E Sargent*  
for L. O. DelGeorge  
Director of Nuclear Licensing

Attachment

cc: NRC Resident Inspector - LSCS  
w/Attachment

CES/lm

ATTACHMENT A  
Requested Preoperational Test Program Exemptions

<u>TEST</u>	<u>TEST SECTIONS</u>	<u>JUSTIFICATION</u>	<u>PROPOSED COMPLETION</u>
PT CM 101 Containment Monitoring	1. Testing of particulate and gaseous radioactivity monitors.	1. Per Technical Specifications, this equipment is not required to be operable during Cold Shutdown or Refueling operations.	Heatup
	2. Suppression Pool Temperature Channels	2. Suppression Pool temperature is not restricted by Technical Specifications during Cold Shutdown or Refueling operations.	Heatup
	3. Suppression Pool Level Instrumentation	3. Per Technical Specifications, the Suppression Pool is not required to be filled if paragraph 3.5.3.b is satisfied.	Heatup
PT CM 102 Post LOCA Containment Monitoring	1. Containment High Range Radiation Monitors	1. Per Technical Specifications, these monitors are not required during Cold Shutdown or Refuel Operations.	Heatup
	2. Auto Initiation of H <sub>2</sub> and O <sub>2</sub> Monitors	2. Per Technical Specifications, these monitors are not required during Cold Shutdown or Refuel Operations.	Heatup
PT IN 101 Drywell Pneumatics	1. ADS Bottle Bank Regulation Valve	1. No components supplied by Drywell Pneumatics are required by Technical Specifications to be operable during Cold Shutdown or Refuel Operations.	Heatup
	2. ADS Accumulator Pressurization		
	3. ADS Accumulator Recharge Rate		
	4. Loss of Air Failure Mode Tests		
	5. Dryer Dew Point Checks		
	6. Relief Valve Set Point Verification		
	7. Component $\Delta P$ Checks		
PT MS 101A MSIV Leakage Control System	1. Valve Tests 2. Logic Checks 3. Integrated Ops	Per Technical Specifications, the Leakage Control System is not required during Cold Shutdown or Refueling Operations.	Heatup
PT NR 102 Traversing Incore Probe (TIP)	1. Entire Test	Per Technical Specifications, the TIP System is not required to be operable until it is used for calibration or monitoring purposes. During the S/U Test Program it is not used until after plant heatup, and then only for process computer checkout. The system is not used for APRM calibration purposes until 20% power is attained in Test Condition 1.	Test Condition 1

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TEST	TEST SECTIONS	JUSTIFICATION	PROPOSED COMPLETION :
PT OG 101 Off-Gas System	<ol style="list-style-type: none"> <li>1. Hydrogen Sensors</li> <li>2. System Flow Checks</li> <li>3. Temp. Control Loops</li> <li>4. Filter Leak Test</li> <li>5. Pressurized Drain Tank Level Control</li> </ol>	<p>Per the Technical Specifications, off-gas system is only required to be operable when the main condenser air ejector system is in operation. The air ejector system will not be operated until plant heatup.</p>	Heatup
PT PC 101 Primary Containment Leak Rate Test	ALL	<p>Per the Technical Specifications, primary containment integrity is not required during Cold Shutdown or Refueling Operations. This test has been successfully completed once, but is no longer valid due to a shift in the calculated accident pressure.</p>	Heatup
PT PR 101 Process Radiation Monitors	<ol style="list-style-type: none"> <li>1. Off Gas Pretreatment</li> <li>2. Off Gas Post Treatment</li> <li>3. Carbon Bed Vault Monitor</li>   <li>4. Main Steam Line Rad Monitors</li>   <li>5. Radwaste Effluent Monitor</li>   <li>Auxiliary Steam Radiation Monitor</li> </ol>	<p>These subsystems will not have anything to monitor until the main condenser air ejectors are started during plant heatup. Although the post treatment subsystem is required to be operable at all times by the Technical Specifications, plant operation is allowed to continue indefinitely if the off-gas flow is suspended, as it will be in Cold Shutdown and Refuel Conditions.</p>	Heatup
		<p>Per Technical Specifications, these monitors are not required to be operable during Cold Shutdown or Refueling Operation.</p>	Heatup
		<p>Per Technical Specification, the Radwaste Effluent Monitor is required to be operable at all times; however, the only required action is to terminate the release of radioactive liquids. Prior to the use of the liquid radwaste processing system there will be no radioactive liquids to discharge.</p>	<p>Prior to any discharge after the liquid radwaste system has been used to process contaminated liquids.</p>
		<p>This subsystem monitors the Auxiliary Steam System for contamination. Prior to operation of the Auxiliary Steam System to supply liquid radwaste, there is no potential for contamination.</p>	<p>Prior to the use of liquid radwaste to process contaminated liquids.</p>

ATTACHMENT A  
Requested Preoperational Test Program Exemptions

TEST	TEST SECTIONS	JUSTIFICATION	PROPOSED COMPLETION
PT SI 101 Seismic Monitoring	Entire Test	Although the Technical Specifications require the seismic monitoring equipment to be operable at all times, they allow plant operation to continue indefinitely with the equipment inoperable. Prior to plant pressurization, there is no credible accident initiated or compounded by seismic events which could imperil the health and safety of the public.	Heatup
PT VP 102 Post LOCA Hydrogen Combiner	1. Heater and Flow Logic 2. Temperature Control Logic 3. Integrated System	1. Per Technical Specifications, the Hydrogen Recombiner is not required during Cold Shutdown or Refuel Operation.	Heatup
PT VW 101 Radwaste Ventilation	1. Flow Verifications 2. Air Conditioning Checks 3. Building Measurements	This system does not provide ventilation to any safety related equipment; its design function is to prevent ground level releases by maintaining the radwaste building at a negative pressure. No release is possible until the radwaste system is used to process contaminated materials.	Prior to using liquid or solid radwaste to process or handle contaminated material.
SD CM 101 HRSS - Containment Atmosphere Sampling	ALL	1. Not required until January 1, 1982, per SER. 2. During fuel loading and open vessel testing primary containment is not maintained. Should an accident occur, the contamination would be monitored by process radiation monitors associated with the Standby Gas Treatment System.	Heatup
SD PS 102 HRSS - Liquid Sampling	ALL	1. This system is not required to be operable until Jan. 1, 1982, per SER. 2. There is no credible accident or sequence of accidents during fuel loading which could lead to contamination levels high enough to require the use of the HRSS.	Initial Criticality