

Attachment B

Marked-up Technical Specification Pages

NPF-11

3/4 8-1*
3/4 8-1a
3/4 8-4

NPF-18

3/4 8-1*
3/4 8-1a
3/4 8-4

*This page has been included for information only. No changes have been made.

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Attachment B

Marked-up Technical Specification Pages

INSERT 1:

* For the purposes of completing maintenance, modification, and/or technical specification surveillance requirements, on the 0 diesel generator and its support systems during a refuel outage, as part of pre-planned maintenance, modifications, and/or the surveillance program, the requirements of action statement b are modified to:

INSERT 2:

4.8.1.1.2.a.7: Verifying the pressure in required diesel generator air start receivers to be greater than or equal to 200 psig.

No Changes -
FOR INFORMATION ONLY

3/4.8 ELECTRICAL POWER SYSTEMS

3/4.8.1 A.C. SOURCES

A.C. SOURCES - OPERATING

LIMITING CONDITION FOR OPERATION

3.8.1.1 As a minimum, the following A.C. electrical power sources shall be OPERABLE:

- a. Two physically independent circuits between the offsite transmission network and the onsite Class 1E distribution system, and
- b. Separate and independent diesel generators* 0, 1A, 2A and 1B with:
 1. For diesel generator 0, 1A and 2A:
 - a) A separate day fuel tank containing a minimum of 250 gallons of fuel.
 - b) A separate fuel storage system containing a minimum of 31,000 gallons of fuel.
 2. For diesel generator 1B, a separate fuel storage tank and a day tank containing a minimum of 29,750 gallons of fuel.
 3. A separate fuel transfer pump.

APPLICABILITY: OPERATIONAL CONDITIONS 1, 2, and 3.

ACTION:

- a. With one offsite circuit of the above required A.C. electrical power sources inoperable, demonstrate the OPERABILITY of the remaining A.C. sources by performing Surveillance Requirement 4.8.1.1.1.a within 1 hour and at least once per 8 hours thereafter. If any of the diesel generators have not been successfully tested within the past 24 hours, demonstrate their OPERABILITY by performing Surveillance Requirement 4.8.1.1.2.a.4 for each such diesel generator, separately, within 24 hours. Restore the offsite circuit to OPERABLE status within 72 hours or be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.
- b. With either the 0 or 1A diesel generator inoperable, demonstrate the OPERABILITY of the above required A.C. offsite sources by performing Surveillance Requirement 4.8.1.1.1.a within 1 hour and at least once per 8 hours thereafter. If the diesel generator became inoperable due to any cause other than preplanned preventive maintenance or testing, demonstrate the OPERABILITY of the remaining OPERABLE

*See page 3/4 8-1(a).

ELECTRICAL POWER SYSTEMS

LIMITING CONDITION FOR OPERATION (Continued)

Insert 1

*For the purposes of completing technical specification surveillance requirements 4.8.1.1.2d.1 and 4.8.1.1.2f.1, as part of a pre-planned preventative maintenance program, on the 0 diesel generator the requirements of action statements b are modified to:

1. Eliminate the requirement for performing technical specification surveillance requirements 4.8.1.1.1a on each operable AC source, immediately and once per 8 hours thereafter, when the 0 diesel generator is declared inoperable.
2. Allow an additional 96 hours in excess of the 72 hours allowed in action statement b for the 0 diesel generator to be inoperable.

Provided that the following conditions are met:

- A. Unit 2 is in operational condition 4 or 5 or defueled prior to taking the 0 diesel generator out of service.
- B. Surveillance requirements 4.8.1.1.1a and 4.8.1.1.2a.4 are successfully completed, for the offsite power sources and the 1A or 2A diesel generators, within 48 hours prior to removal of the 0 diesel generator from service.
- C. No maintenance is performed on the offsite circuits or the 1A or 2A diesel generators, while the 0 diesel generator is inoperable.
- D. Technical specification requirement 4.8.1.1.1a is performed daily, while the 0 diesel generator is inoperable.
- E. The control circuit for the unit cross-tie circuit breakers between buses 142Y and 242Y are temporarily modified to allow the breakers to be closed with a diesel generator feeding the bus, while the 0 diesel generator is inoperable.

The provisions of technical specification 3.0.4 are not applicable.

ELECTRICAL POWER SYSTEMS

SURVEILLANCE REQUIREMENTS

6. Verifying the diesel generator is aligned to provide standby power to the associated emergency busses.
7. Verifying the pressure in all diesel generator air start receivers to be greater than or equal to 200 psig.
- b. At least once per 31 days and after each operation of the diesel where the period of operation was greater than or equal to 1 hour by checking for and removing accumulated water from the day fuel tanks.
- c. At least once per 92 days and from new fuel oil prior to addition to the storage tanks by verifying that a sample obtained in accordance with ASTM-D270-1975 has a water and sediment content of less than or equal to 0.05 volume percent and a kinematic viscosity @ 40°C of greater than or equal to 1.9 but less than or equal to 4.1 when tested in accordance with ASTM-D975-77, and an impurity level of less than 2 mg of insolubles per 100 ml when tested in accordance with ASTM-D2274-70.
- d. At least once per 18 months during shutdown by:
1. Subjecting the diesel to an inspection in accordance with procedures prepared in conjunction with its manufacturer's recommendations for this class of standby service.
 2. Verifying the diesel generator capability* to reject a load of greater than or equal to 1190 kW for diesel generator 0, greater than or equal to 638 kW for diesel generators 1A and 2A, and greater than or equal to 2421 kW for diesel generator 1B while maintaining engine speed less than or equal to 75% of the difference between nominal speed and the overspeed trip setpoint or 15% above nominal, whichever is less.
 3. Verifying the diesel generator capability* to reject a load of 2600 kW without tripping. The generator voltage shall not exceed 5000 volts during and following the load rejection.
 4. Simulating a loss of offsite power* by itself, and:
 - a) For Divisions 1 and 2 and for Unit 2 Division 2:
 - 1) Verifying de-energization of the emergency busses and load shedding from the emergency busses.

*All planned diesel generator starts performed for the purpose of meeting these surveillance requirements may be preceded by an engine prelube period, as recommended by the manufacturer.

3/4.8 ELECTRICAL POWER SYSTEMS

3/4.8.1 A.C. SOURCES

A.C. SOURCES - OPERATING

LIMITING CONDITION FOR OPERATION

No CHANGES -
FOR INFORMATION ONLY

3.8.1.1 As a minimum, the following A.C. electrical power sources shall be OPERABLE:

- a. Two physically independent circuits between the offsite transmission network and the onsite Class 1E distribution system, and
- b. Separate and independent diesel generators* 0, 1A, 2A and 2B with:
 1. For diesel generator 0, 1A and 2A:
 - a) A separate day fuel tank containing a minimum of 250 gallons of fuel.
 - b) A separate fuel storage system containing a minimum of 31,000 gallons of fuel.
 2. For diesel generator 2B, a separate fuel storage tank and a day tank containing a minimum of 29,750 gallons of fuel.
 3. A separate fuel transfer pump.

APPLICABILITY: OPERATIONAL CONDITIONS 1, 2, and 3.

ACTION:

- a. With one offsite circuit of the above required A.C. electrical power sources inoperable, demonstrate the OPERABILITY of the remaining A.C. sources by performing Surveillance Requirement 4.8.1.1.1.a within 1 hour and at least once per 8 hours thereafter. If any of the diesel generators have not been successfully tested within the past 24 hours, demonstrate their OPERABILITY by performing Surveillance Requirement 4.8.1.1.2.a.4 for each such diesel generator, separately, within 24 hours. Restore the offsite circuit to OPERABLE status within 72 hours or be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.
- b. With either the 0 or 2A diesel generator inoperable, demonstrate the OPERABILITY of the above required A.C. offsite sources by performing Surveillance Requirement 4.8.1.1.1.a within 1 hour and at least once per 8 hours thereafter. If the diesel generator became inoperable due to any cause other than preplanned preventive maintenance or testing, demonstrate the OPERABILITY of the remaining OPERABLE

*See page 3/4 8-1(a).

ELECTRICAL POWER SYSTEMS

LIMITING CONDITION FOR OPERATION (Continued)

INSERT

1

*For the purposes of completing technical specification surveillance requirements 4.8.1.1.2d.1 and 4.8.1.1.2f.1, as part of a pre-planned preventative maintenance program, on the 0 diesel generator the requirements of action statements b are modified to:

1. Eliminate the requirement for performing technical specification surveillance requirements 4.8.1.1.1a on each operable AC source, immediately and once per 8 hours thereafter, when the 0 diesel generator is declared inoperable.
2. Allow an additional 96 hours in excess of the 72 hours allowed in action statement b for the 0 diesel generator to be inoperable.

Provided that the following conditions are met:

- A. Unit 1 is in operational condition 4 or 5 or defueled prior to taking the 0 diesel generator out of service.
- B. Surveillance requirements 4.8.1.1.1a and 4.8.1.1.2a.4 are successfully completed, for the offsite power sources and the 1A or 2A diesel generators, within 48 hours prior to removal of the 0 diesel generator from service.
- C. No maintenance is performed on the offsite circuits or the 1A or 2A diesel generators, while the 0 diesel generator is inoperable.
- D. Technical specification requirement 4.8.1.1.1a is performed daily, while the 0 diesel generator is inoperable.
- E. The control circuit for the unit cross-tie circuit breakers between buses 142Y and 242Y are temporarily modified to allow the breakers to be closed with a diesel generator feeding the bus, while the 0 diesel generator is inoperable.

The provisions of technical specification 3.0.4 are not applicable.

ELECTRICAL POWER SYSTEMS

SURVEILLANCE REQUIREMENTS

- INSERT 2 →
6. Verifying the diesel generator is aligned to provide standby power to the associated emergency busses.
 7. Verifying the pressure in all diesel generator air start receivers to be greater than or equal to 200 psig.
- b. At least once per 31 days and after each operation of the diesel where the period of operation was greater than or equal to 1 hour by checking for and removing accumulated water from the day fuel tanks.
- c. At least once per 92 days and from new fuel oil prior to addition to the storage tanks by verifying that a sample obtained in accordance with ASTM-D270-1975 has a water and sediment content of less than or equal to 0.05 volume percent and a kinematic viscosity @ 40°C of greater than or equal to 1.9 but less than or equal to 4.1 when tested in accordance with ASTM-D975-77, and an impurity level of less than 2 mg of insolubles per 100 ml when tested in accordance with ASTM-D2274-70.
- d. At least once per 18 months during shutdown by:
1. Subjecting the diesel to an inspection in accordance with procedures prepared in conjunction with its manufacturer's recommendations for this class of standby service.
 2. Verifying the diesel generator capability* to reject a load of greater than or equal to 1190 kW for diesel generator 0, greater than or equal to 638 kW for diesel generators 1A and 2A, and greater than or equal to 2421 kW for diesel generator 2B while maintaining engine speed less than or equal to 75% of the difference between nominal speed and the overspeed trip setpoint or 15% above nominal, whichever is less.
 3. Verifying the diesel generator capability* to reject a load of 2600 kW without tripping. The generator voltage shall not exceed 5000 volts during and following the load rejection.
 4. Simulating a loss of offsite power* by itself, and:
 - a) For Divisions 1 and 2 and for Unit 1 Division 2:
 - 1) Verifying de-energization of the emergency busses and load shedding from the emergency busses.

*All planned diesel generator starts performed for the purpose of meeting these surveillance requirements may be preceded by an engine prelube period as recommended by the manufacturer.

Attachment C

Evaluation of Significant Hazards Consideration

Commonwealth Edison has evaluated the proposed Technical Specification Amendment and determined that it does not represent a significant hazards consideration. Based on the criteria for defining a significant hazards consideration established in 10 CFR 50.92, operation of LaSalle County Station Units 1 and 2 in accordance with the proposed amendment will not:

- 1) Involve a significant increase in the probability or consequences of an accident previously evaluated because:

The total amount of time that the "0" Diesel Generator is inoperable during a refuel outage will not increase as a result of this change, only the type of work being performed is expanded. In addition to the surveillances already permitted by the current footnote, this work will include planned maintenance and modifications

The proposed amendment to surveillance requirement 4.8.1.1.2.a.7 clarifies that a diesel generator is operable with the receivers of one air start subsystem to be pressurized to greater than or equal to 200 psig instead of all air start receivers. Per the UFSAR and the LaSalle SER, NUREG-0519, each subsystem (two per diesel generator) is independent and full capacity, thus fully meeting the design criteria for the diesel generator. Both of the air start subsystems are normally operable, so that this change only pertains to cases where a failure of one subsystem occurs or one subsystem is removed from service for inspections, surveillance, or preventative maintenance. A normally closed crosstie valve is located downstream of the subsystem air start receivers. This valve is used to keep the receivers for both subsystems pressurized using only one air compressor while one compressor or associated moisture removal equipment is inoperable, thus minimizing the time the receivers for a subsystem are less than 200 psig.

Therefore, there is no change to the assumptions or initiators of any previously evaluated accident and there is no change to the consequences of an accident previously evaluated.

- 2) Create the possibility of a new or different kind of accident from any accident previously evaluated because:

This amendment request does not change the length of time that the "0" diesel generator is allowed to be inoperable with one unit in cold shutdown, refuel, or defueled and the other unit in normal operation, only the work allowed is changed. Therefore, the possibility of a new or different kind of accident than the accidents previously evaluated is not created.

Attachment C

Evaluation of Significant Hazards Consideration (continued)

The change to the surveillance requirement for the diesel generator air start receivers does not change the starting capability of the diesel generator. The diesel was designed to start with only one air start subsystem, and the surveillance assures the availability of the starting air required to start the diesel. Therefore, the possibility of a new or different kind of accident than the accidents evaluated is not created.

- 3) Involve a significant reduction in the margin of safety because:

The requested change to the work allowed to be performed on the "0" diesel generator during a seven day allowed outage time, with one unit in cold shutdown or a lower condition, is limited to the "0" diesel generator. Due to the physical and electrical separation between the diesel generator divisions, no other diesel generators will be effected by the work on the "0" diesel generator. Also, compensatory measures are taken to assure that the remaining required diesel generators and offsite AC sources are operable during the time the "0" diesel generator is out of service. The term pre-planned maintenance excludes any repairs that are required due to a "valid failure" of the "0" diesel generator, thus preventing use of the seven day allowed outage time where the potential for a known condition exists that may effect more than one diesel generator. Therefore, this change is administrative in nature and does not involve a reduction in the margin of safety.

The air start receiver surveillance change would allow a diesel generator to be considered operable with the receivers of only one air start subsystem to be pressurized rather than all receivers pressurized. The UFSAR states that each air start system consists of two full capacity subsystems, therefore one subsystem meets the starting air required by design to start the associated diesel generator. The required essential service system redundancy is met by each diesel generator, not by the redundancy of the supporting systems for each diesel generator. Both subsystems are normally in service for each diesel generator, and therefore the only time when this would not be true is upon component failure, maintenance, or surveillance. Air start system work is considered to be high priority, so the time an air start subsystem is out of service is inherently kept to a minimum by the work request priority system and planning department practices. By allowing a diesel generator to remain operable with one air start subsystem pressurized, unnecessary diesel generator starts are avoided, thus compensating for any slight reduction in the margin of safety by this change.

Therefore, there is no significant reduction in the margin of safety for the above changes.

Attachment C

Evaluation of Significant Hazards Consideration (continued)

Guidance has been provided in "Final Procedures and Standards on No Significant Hazards Considerations," Final Rule, 51 FR 7744, for the application of standards to license change requests for determination of the existence of significant hazards considerations. This document provides examples of amendments which are and are not considered likely to involve significant hazards considerations. The proposed amendment to redefine the work allowed to be done on the "0" diesel generator most closely fits the example of a purely administrative change. The proposed amendment to the diesel engine air start system most closely fits the example of a change which may result in a slight reduction in a safety margin, but is clearly within all acceptable criteria as specified in section 9.5.6 of the Standard Review Plan.

In summary, this proposed amendment does not involve a significant relaxation of the criteria used to establish safety limits, a significant relaxation of the bases for the limiting safety system settings or a significant relaxation of the bases for the limiting conditions for operations. Therefore, based on the guidance provided in the Federal Register and the criteria established in 10 CFR 50.92(c), the proposed change does not constitute a significant hazards consideration.

Attachment D

Environmental Assessment Statement Applicability Review

Commonwealth Edison has evaluated the proposed amendment against the criteria for the identification of licensing and regulatory actions requiring environmental assessment in accordance with 10 CFR 51.21. It has been determined that the proposed change meets the criteria for a categorical exclusion as provided for under 10 CFR 51.22(c)(9). This conclusion has been determined because the proposed changes do not pose a significant hazards consideration or do not involve a significant increase in the amounts, and no significant changes in the types, or effluents that may be released offsite. This request does not involve a significant increase in individual or cumulative occupational radiation exposure. Therefore, the Environmental Assessment Statement is not applicable for these changes.