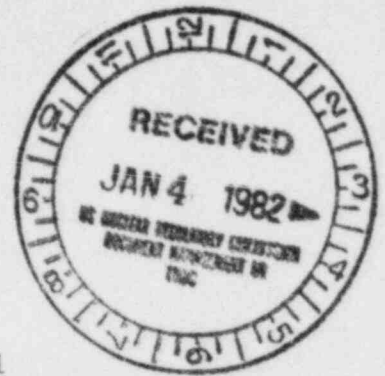




Commonwealth Edison
 One First National Plaza, Chicago, Illinois
 Address Reply to: Post Office Box 767
 Chicago, Illinois 60690



December 30, 1981

Mr. Darrell G. Eisenhut, Director
 Division of Licensing
 U.S. Nuclear Regulatory Commission
 Washington, DC 20555

Subject: LaSalle County Station Unit 1
 Implementation Status of NUREG-0737
NRC Docket No. 50-373

- References (a): L. O. DelGeorge letter to A. Schwencer dated November 6, 1981
- (b): C. E. Sargent letter to A. Schwencer dated December 24, 1981
- (c): R. L. Tedesco letter to L. O. DelGeorge dated October 27, 1981

Dear Mr. Eisenhut:

The purpose of this letter is to provide the implementation status of LaSalle County Station NUREG-0737 items as you requested in a meeting in your offices on November 20, 1981.

This letter along with its enclosure provides the current status of those NUREG 0737 items where we have identified problems in meeting the required implementation dates. In many cases, as identified in the enclosure, the delayed implementation dates have been previously identified and approved in the LaSalle County Station SER, NUREG-0519 and its Supplement. Additionally, other delayed implementation dates have been addressed in Amendments to the LaSalle County Station FSAR. For the sake of completeness all items not meeting the required implementation date are summarized in the enclosure.

Based upon the explanation and justification provided in the enclosure to this letter, the SER, and FSAR, we hereby request Commission approval to delay the implementation due dates to accommodate the proposed schedule.

To the best of my knowledge and belief, the statements contained herein and in the enclosure are true and correct. In some respects, these statements are not based upon my personal knowledge

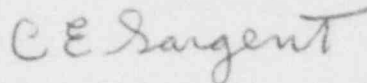
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but upon information furnished by other Commonwealth Edison employees. Such information has been reviewed in accordance with Company practice and I believe it to be reliable.

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

Very truly yours,

A handwritten signature in cursive script that reads "C. E. Sargent". The signature is written in dark ink and is positioned above the typed name.

C. E. Sargent
Nuclear Licensing Administrator

Enclosure

cc: NRC Resident Inspector - LSCS

Enclosure

NUREG-0737
ITEM

I.A.1.1 Shift Technical Advisor

The commitment detailed in NUREG-0519, LaSalle County Station SER pages 22-4 and 5, regarding the Shift Foreman's two hour reporting frequency to the control room will not be implemented as described. An alternative position regarding the Shift Foreman's Control Room reporting frequency has been agreed upon with NRR's Division of Human Factors. It is our understanding this agreement will be included in the SSER and will resolve the issue resulting in compliance with requirements of NUREG-0737.

I.C.7 NSSS Vendor Review of Procedures

Item I.C.7.1 Low-power Test program review is currently in progress with the target completion date of prior to fuel load as required by NUREG 0737. Additionally the emergency procedures identified in Item I.C.7.2 will be completed prior to fuel load.

Item I.C.7.2 Power Ascension procedures are required to be reviewed by the NSSS vendor before reaching full power per NUREG-0737. NUREG-0519, LaSalle County Station SER requires the review and implementation of vendor recommendations prior to the beginning of the low power testing. Based upon the recommendations in Regulatory Guide 1.68, Commonwealth Edison proposes the implementation date for the completion of this item be sixty (60) days prior to intended use of the procedure. This would result in substantial compliance with NUREG-0737.

I.C.8 NRC Audit of Selected Emergency Procedures

This requirement will be met as we currently understand the conditions. The NRC audit has been initiated and initial results have been documented in NRC Inspection Report 81-40 within item 373/81-00-82 which has yet to be published for CECO. review and disposition.

I.D.1 Control Room Design Review

The review in accordance with NUREG-0737 has been completed. All action required resulting from the NRC review (SER supplement No. 1 Appendix C) has not yet been completed. Two other items, identified in your letter (Reference (c)) dated October 27, 1981, have likewise not yet been completed.

The recent identification of the additional ceiling panel and lighting needs is the primary cause of the possible inability to meet the NUREG-0737 requirements. The "prior to fuel load" requirement of SER Supplement 1 is our proposed implementation date for completion of this item.

I.G.1. Training during Low-Power Testing

The only remaining item incomplete from this portion of the NUREG is the "Complete Station Black-Out Test". This test is to be performed prior to the 1st refueling outage on Unit 1 as identified in NUREG-0519, LaSalle County Station SER. The commitment to have the procedure available for review and approval four (4) weeks prior to performing the test is currently within CECO.'s schedule.

II.B.2 Plant Shielding

The implementation date of 1/1/82 will not be fully met. All required action will be complete except for installation of a few minor hardware items on the shielding doors. The necessary door hardware will be installed prior to fuel loading. The door hardware is being installed just prior to fuel load to insure operability of the doors at the fuel load date.

II.B.3 Post Accident Sampling

The NUREG-0737 implementation date of 1/1/82 will not be met. System preoperational testing is in progress with approximately 20 percent completed to date. The difficulty in meeting the 1/1/82 date was recognized previously and a request for deferral of system testing, Reference (a) and (b), has been submitted. The proposed implementation date for this item is prior to Unit 1 heatup. This is in compliance with the LaSalle County Station Technical Specifications and also recognizes the absence of a significant amount of fission product inventory in the fuel.

II.D.3 Valve Position Indication

The currently installed position devices on the safety relief valves provide position indication in the control room as required by NUREG 0737. Because the environmental qualification of this device has not been shown to meet the NUREG-0588 requirements; thermocouples have been installed in the discharges of the valves and procedures have been developed to aid operator awareness of valve position.

The acceptability of completing the environmental qualification beyond the NUREG-0737 completion date of four months prior to issuance of the operating license is identified in NUREG-0519, LaSalle County Station SER. This item will be completed at the first refueling outage of sufficient duration to permit completion of the work.

II.F.1 Accident Monitoring Instrumentation

Compliance with this item falls into six (6) categories. Items 3 thru 6 are either installed and operational, or have been installed and removed for safe storage until a period just prior to fuel loading, thus assuring operability of the equipment.

Items 1 and 2, the Noble Gas and Iodine/Particulate Sample systems, have recently been installed. Testing prior to turnover for operational control is currently scheduled for completion in early February 1982.

Delays at the vendor for equipment development and delays in delivery of equipment including modification of the original design as issued by the architect engineer delayed its installation. This in turn delayed the start of the system demonstration testing.

The final testing and calibration for items 1 and 2 will not be completed within the time required by NUREG-0737 and as a result a formal request has been made, Reference (a) and (b), to defer the preoperational testing of this equipment. The proposed completion date is prior to plant heatup as required by the LaSalle County Technical Specification.

II.F.2 Instrumentation for Detection of Adequate Core Cooling

Commonwealth Edison's position is that incore thermocouples cannot provide useful operator information with respect to inadequate core cooling. Response time from steam dome thermocouples precludes their usefulness as fuel temperature indicators. Alternatives are under consideration by NTOL plant utilities under LRG auspices.

II.K.1.22 IE Bulletins, Auxiliary Heat Removal System Procedures

This item will be completed as required by NUREG-0737 when the reactor core isolation cooling initiation logic modification is complete. The delay is necessary to insure the equipment is installed prior to implementing the operating procedure. Reference item II.K.3.13 of this report for the completion date.

II.K.3.13 HPCI and RCIC Initiation Levels and Automatic RCIC Restart

(a) FSAR Appendix L.58 (Amendment 56) included the CECO endorsement of the BWR Owner's Group conclusion that separation of the initiation levels for HPCS and RCIC was not necessary for safety reasons. That conclusion was accepted in the SER because changing the HPCS or RCIC initiation levels would not impact the thermal cycles experienced by the feedwater nozzle which is not an injection point for these systems at LaSalle.

(b) FSAR Appendix L.58 (Amendment 56) also discussed the automatic restart of RCIC on low water level following a trip on high reactor vessel water level. Improved reliability results from moving the vessel high level trip from the RCIC turbine trip valve to the RCIC steam supply valve because closure of the RCIC steam supply valve enables the RCIC to restart on vessel low level 2. This reset was formerly done manually. The LSCS-SER accepted the design change and suggested implementation as soon as practical. The LaSalle analysis for this change was provided in Appendix L.58 and a commitment made for installation at the first refueling outage. This commitment still represents Commonwealth Edison's position for completion of this item. The detailed justification for this item is provided in the FSAR as noted above.

II.K.3.15 Spurious isolation of HPCI and RCIC due to pressure spikes on break-detection instruments

FSAR Appendix L.59 (Amendment 56) reports the LaSalle endorsement of the BWR Owner's position that the RCIC break detection circuitry be modified with redundant time delay relays to eliminate spurious shut-off signals resulting from flow peaks during normal RCIC system startup. LaSalle utilizes a motor driven HPCS rather than HPCI hence has no need for equivalent pressure-spike protection in that system. The non-availability of qualified time-delay relays has delayed their installation past the original July 1981 target date. These time-delay relays will be installed at the first refueling outage after qualified equipment becomes available. The detailed justification for this item is provided in the FSAR as noted above.

II.K.3.21 Auto restart of Core Spray (HPCS) and LPCI

The SER indicates acceptance of Edison's conclusion that no modification is required to provide automatic restart of the LaSalle low pressure ECCS's.

The auto restart of the HPCS is reported in FSAR Appendix L.63 (Part B) Amendment 59. Edison endorses the BWR Owner's Group conclusion that the current HPCS in BWR5/6 is fully adequate without design changes for safety reasons. Nevertheless, Edison has committed to automate HPCS restart on low water level following its trip by an operator. The change leads to a safety improvement without adverse system impact because it precludes operator errors of omission that could potentially lead to degraded core cooling conditions during the long term whenever a LOCA signal persists. The equipment modification is a bypass of the high drywell pressure signal (which inhibits reset) and it was submitted for review in Amendment 59. Edison committed to install this HPCS auto restart capability during the first refueling outage of sufficient duration to permit installation subject to the availability of environmentally qualified components and NRC agreement that this proposed modification is acceptable. The detailed justification for this position is provided in Amendment 59 to the FSAR.

II.K.3.24 Adequacy of Space Cooling for HPCI and RCIC

The LaSalle plant uses HPCS (motor driven) not HPCI (turbine driven). The ECCS equipment area cooling trains are designated engineering safety features at LaSalle. They are sized for abnormal and accident conditions to maintain allowable operating temperatures in the ECCS cubicles. The SER accepted the adequacy of these systems. The only outstanding item is the Station Black-Out Test which is to be performed prior to the first refueling outage to fulfill this NUREG-0737 requirement. The implementation date for this final item was reviewed in the LaSalle SER.

II.K.3.25 Effect of Loss of Offsite (AC) Power on Recirculation Pump Seals

FSAR Appendix L.66 (Amendment 56) was updated in Amendment 59 to include test results (Sept. 81) on the Bingham recirculation pumps as installed at LaSalle on Byron Jackson pumps of similar design. Test results indicate that, even if the cooling water is lost for 2 hours, no safety problem exists. Pump seal repairs may be required prior to resumption

of pump operations, but with redundant pump seal coolant loops available at LaSalle, this is not an expected occurrence. Seal leakage analysis indicated that a 70 gpm loss could result from extremely degraded seals; this quantity is of no safety concern. Thus, no further action is judged necessary to resolve this issue.