ATTACHMENT B

PROPOSED CHANGES TO THE TECHNICAL
SPECIFICATIONS FOR OPERATING LICENSES
NPF-11 AND NPF-18

Revised Pages:

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ID80

CONTAINMENT SYSTEMS

DRYWELL AND SUPPRESSION CHAMBER PURGE SYSTEM

LIMITING CONDITION FOR OPERATION

3.6.1.8 The drywell and suppression chamber purge system may be in operation with the drywell and/or suppression chamber purge supply and exhaust butterfly isolation valves open for inerting, de-inerting and pressure control. Purging through the Standby Gas Treatment System shall be restricted to less than or equal to 90 hours per 365 days.

APPLICABILITY: OPERATIONAL CONDITIONS 1, 2 and 3.

ACTION:

With a drywell and/or suppression chamber purge supply and/or exhaust butterfly isolation valve open for other than inerting, de-inerting or pressure control, close the butterfly valve(s) within one hour or be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.

REPLACE WITH INSERT A

SURVEILLANCE REQUIREMENTS

4.6.1.8.1 The cumulative time that the drywell and suppression chamber purge system has been in operation purging through the Standby Gas Treatment System shall be verified to be less than or equal to 90 hours per 365 days prior to use in this mode of operation.

TABLE 3.6.3-1 (Continued)

PRIMARY CONTAINMENT ISOLATION VALVES

VALVE FUNCTION AND NUMBER	VALVE GROUP[a]	MAXIMUM ISOLATION TIME (Seconds)
Automatic Isolation Valves (Continued)		
8. Containment Vent and Purge Valves	4	
1VQ026 (m)		≤ 10
1VQ027 (m)		10
1VQ029 (m)		10
1VQ030 (m)		10
1VQ031 (m)		10
1VQ032		5
1VQ034 (m)		10
1VQ035		5
1VQ036 (m)		10
1VQ040 (m)		15
1VQ042 (m)		15
1VQ043 (m)		10
1VQ047		5
1VQ048		5
1VQ050		5
1VQ051		5
1VQ068		5
9. RCIC Turbine Exhaust Vacuum Breaker Line Valves	9	N.A.
1E51-F080		
1E51-F086		
10. LPCS, HPCS, RCIC, RHR Injection Testable Check Bypass Valves	N.A.	N.A.

TABLE 3.6.3-1 (Continued)

PRIMARY CONTAINMENT ISOLATION VALVES

VALVE FUNCTION AND NUMBER

Other Isolation Valves (Continued)

7. Post LOCA Hydrogen Control

1HG001A, B
1HG002A, B
1HG005A, B
1HG006A, B

8. Standby Liquid Control System

1C41-F004A, B
1C41-F007

9. Reactor Recirculation Seal Injection***

1B33-F013A, B(j)
1B33-F017A, B(j)

10. Drywell Pneumatic System
1IN018

* But ≥ 3 seconds.
(a) See Specification 3.3.2, Table 3.3.2-1, for isolation signal(s) that operates each valve group.
(b) Not included in total sum of Type B and C tests.
(c) May be opened on an intermittent basis under administrative control.
(d) Not closed by SLCS actuation.
(e) Not closed by Trip Functions 5a, b or c, Specification 3.3.2, Table 3.3.2-1.
(f) Not closed by Trip Functions 4a, c, d, e or f of Specification 3.3.2, Table 3.3.2-1.
(g) Not subject to Type C leakage test.
(h) Opens on an isolation signal. Valves will be open during Type A test. No Type C test required.
(i) Also closed by drywell pressure-high signal.
(j) Hydraulic leak test at 43.6 psig.
(k) Not subject to Type C leakage test - leakage rate tested per Specification 4.4.3.2.2.
(l) These penetrations are provided with removable spools outboard of the outboard isolation valve. During operation, these lines will be blind flanged using a double O-ring and a type B leak test. In addition, the packing of these isolation valves will be soap-bubble tested to ensure insignificant or no leakage at the containment test pressure each refueling outage.

*** The specified 18-month interval may be waived for Cycle 1 provided the surveillance is performed during Refuel 1, which is to commence no later than October 27, 1985.

INSERT B

3/4.6.1.5 PRIMARY CONTAINMENT STRUCTURAL INTEGRITY

This limitation ensures that the structural integrity of the containment will be maintained comparable to the original design standards for the life of the facility. Structural integrity is required to ensure that the containment will withstand the maximum pressure of 45 psig in the event of a LOCA. The measurement of containment tendon lift-off force, the tensile tests of the tendon wires or strands, the visual examination of tendons, anchorages and exposed interior and exterior surfaces of the containment, the chemical and visual examination of the sheathing filler grease, and the Type A leakage test are sufficient to demonstrate this capability.

The surveillance requirements for demonstrating the primary containment's structural integrity and the method of predicting the pre-stress loses are in compliance with the recommendations of Regulatory Guide 1.35.1, "Inservice Inspection of Ungrouted Tendons in Prestressed Concrete Containment Structures," January 1976, and proposed Regulatory Guide 1.35.1, "Determining Prestressing Forces for Inspection of Prestressed Concrete Containment Structures," April 1979 with the following clarification: the tested lift-off force of individual tendon tension shall be greater than or equal to the initial pre-stress minus the loses, as predicted in the as-built design, which occur between the initial pre-operational structural integrity test and the time of subsequent surveillance.

The required Special Reports from any engineering evaluation or containment abnormalities shall include a description of the tendon condition, the condition of the concrete (especially at tendon anchorages), the inspection procedure, the tolerances on cracking, the results of the engineering evaluation, and the corrective action taken.

3/4.6.1.6 DRYWELL AND SUPPRESSION CHAMBER INTERNAL PRESSURE

The limitations on drywell and suppression chamber internal pressure ensure that the containment peak pressure of 39.6 psig does not exceed the design pressure of 45 psig during LOCA conditions or that the external pressure differential does not exceed the design maximum external pressure differential of 5 psid. The limit of 2.0 psig for initial positive primary containment pressure will limit the total pressure to 39.6 psig which is less than the design pressure and is consistent with the accident analysis.

3/4.6.1.7 DRYWELL AVERAGE AIR TEMPERATURE

The limitation on drywell average air temperature ensures that the containment peak air temperature does not exceed the design temperature of 340°F during LOCA conditions and is consistent with the accident analysis.

3/4.6.1.8 DRYWELL AND SUPPRESSION CHAMBER PURGE SYSTEM

The drywell and suppression chamber purge supply and exhaust isolation valves are required to be closed during plant operation except as required for inerting, de-inerting and pressure control. These valves have been demonstrated capable of closing during a LOCA or steam line break accident from the full open position.

REPLACE WITH INSERT C.

PROPOSED TECHNICAL SPECIFICATION INSERTS

INSERT A

With more than one drywell or suppression chamber purge system supply or exhaust butterfly isolation valve open, in any purge system primary containment penetration, for any purpose other than inerting, de-inerting or pressure control, close at least one of the isolation valves in the affected primary containment penetration within one hour or be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.

INSERT B

m. The requirements of Technical Specification 3.6.1.8 may also apply.

INSERT C

At least one of the drywell and suppression chamber purge system supply or exhaust isolation valves in each purge system primary containment penetration is required to be closed during plant operation except as required for inerting, de-inerting, and pressure control. These valves have been demonstrated to be capable of closing during a LOCA or steam line break accident from the full open position. The purge system is considered to be in operation whenever more than one of the purge system butterfly valves in any of the containment penetrations are open. When cycling the purge system butterfly isolation valves for preventive maintenance or testing purposes, one valve in each penetration shall remain closed while cycling the other valve in that penetration.

CONTAINMENT SYSTEMS

DRYWELL AND SUPPRESSION CHAMBER PURGE SYSTEM

LIMITING CONDITION FOR OPERATION

3.6.1.8 The drywell and suppression chamber purge system may be in operation with the drywell and/or suppression chamber purge supply and exhaust butterfly isolation valves open for inerting, deinerting, and pressure control. Purging through the Standby Gas Treatment System shall be restricted to less than or equal to 90 hours per 365 days.

APPLICABILITY: OPERATIONAL CONDITIONS 1, 2, and 3.

ACTION: REPLACE WITH INSERT A

With a drywell and/or suppression chamber purge supply and/or exhaust butterfly isolation valve open for other than inerting, deinerting, or pressure control, close the butterfly valve(s) within 1 hour or be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.

SURVEILLANCE REQUIREMENTS

4.6.1.8.1 The cumulative time that the drywell and suppression chamber purge system has been in operation purging through the Standby Gas Treatment System shall be verified to be less than or equal to 90 hours per 365 days prior to use in this mode of operation.

TABLE 3.6.3-1 (Continued)

PRIMARY CONTAINMENT ISOLATION VALVES

VALVE FUNCTION AND NUMBER	VALVE GROUP[a]	MAXIMUM ISOLATION TIME (Seconds)
Automatic Isolation Valves (Continued)		
8. Containment Vent and Purge Valves	4	
2VQ026 (m)		< 10
2VQ027 (m)		< 10
2VQ029 (m)		< 10
2VQ030 (m)		< 10
2VQ031 (m)		< 10
2VQ032		< 5
2VQ034 (m)		< 10
2VQ035		< 5
2VQ036 (m)		< 10
2VQ040 (m)		< 10
2VQ042 (m)		< 10
2VQ043 (m)		< 10
2VQ047		< 5
2VQ048		< 5
2VQ050		< 5
2VQ051		< 5
2VQ068		< 5
9. RCIC Turbine Exhaust Vacuum Breaker Line Valves	9	N.A.
2E51-F080		
2E51-F086		
10. LPCS, HPCS, RCIC, RHR Injection Testable Check Bypass Valves[g]	N.A.	N.A.

TABLE 3.6.3-1 (Continued)

PRIMARY CONTAINMENT ISOLATION VALVES

VALVE FUNCTION AND NUMBER

Other Isolation Valves (Continued)

7. Post LOCA Hydrogen Control

2HG001A, B
2HG002A, B
2HG005A, B
2HG006A, B

8. Standby Liquid Control System

2C41-F004A, B
2C41-F007.

9. Reactor Recirculation Seal Injection

2B33-F013A, B(j)
2B33-F017A, B(j)

10. Drywell Pneumatic Valves

2IN018

TABLE NOTATIONS

*But > 3 seconds.
(a) See Specification 3.3.2, Table 3.3.2-1, for isolation signal(s) that operates each valve group.
(b) Not included in total sum of Type B and C tests.
(c) May be opened on an intermittent basis under administrative control.
(d) Not closed by SLCS actuation.
(e) Not closed by Trip Functions 5a, b, or c, Specification 3.3.2, Table 3.3.2-1.
(f) Not closed by Trip Functions 4a, c, d, e, or f of Specification 3.3.2, Table 3.3.2-1.
(g) Not subject to Type C leakage test.
(h) Opens on an isolation signal. Valves will be open during Type A test. No Type C test required.
(i) Also closed by drywell pressure-high signal.
(j) Hydraulic leak test at 43.6 psig.
(k) Not subject to Type C leakage test - leakage rate tested per Specification 4.4.3.2.2.
(l) These penetrations are provided with removable spools outboard of the outboard isolation valve. During operation, these lines will be blind flanged using a double O-ring and a type B leak test. In addition, the packing of these isolation valves will be soap-bubble tested to ensure insignificant or no leakage at the containment test pressure each refueling outage.

INSERT B

3/4.6.1.5 PRIMARY CONTAINMENT STRUCTURAL INTEGRITY

This limitation ensures that the structural integrity of the containment will be maintained comparable to the original design standards for the life of the facility. Structural integrity is required to ensure that the containment will withstand the maximum pressure of 45 psig in the event of a LOCA. The measurement of containment tendon lift-off force, the tensile tests of the tendon wires or strands, the visual examination of tendons, anchorages and exposed interior and exterior surfaces of the containment, the chemical and visual examination of the sheathing filler grease, and the Type A leakage test are sufficient to demonstrate this capability.

The surveillance requirements for demonstrating the primary containment's structural integrity and the method of predicting the prestress losses are in compliance with the recommendations of Regulatory Guide 1.35, "Inservice Inspection of Ungrouted Tendons in Prestressed Concrete Containment Structures," January 1976, and proposed Regulatory Guide 1.35.1, "Determining Prestressing Forces for Inspection of Prestressed Concrete Containment Structures," April 1979 with the following clarification: the tested lift-off force of individual tendon tension shall be greater than or equal to the initial prestress minus the losses, as predicted in the as-built design, which occur between the initial pre-operational structural integrity test and the time of subsequent surveillance.

The required Special Reports from any engineering evaluation of containment abnormalities shall include a description of the tendon condition, the condition of the concrete (especially at tendon anchorages), the inspection procedure, the tolerances on cracking, the results of the engineering evaluation, and the corrective action taken.

3/4.6.1.6 DRYWELL AND SUPPRESSION CHAMBER INTERNAL PRESSURE

The limitations on drywell and suppression chamber internal pressure ensure that the containment peak pressure of 39.6 psig does not exceed the design pressure of 45 psig during LOCA conditions or that the external pressure differential does not exceed the design maximum external pressure differential of 5 psid. The limit of 2.0 psig for initial positive primary containment pressure will limit the total pressure to 39.6 psig which is less than the design pressure and is consistent with the safety analysis.

3/4.6.1.7 DRYWELL AVERAGE AIR TEMPERATURE

The limitation on drywell average air temperature ensures that the containment peak air temperature does not exceed the design temperature of 340°F during LOCA conditions and is consistent with the safety analysis.

3/4.6.1.8 DRYWELL AND SUPPRESSION CHAMBER PURGE SYSTEM

The drywell and suppression chamber purge supply and exhaust isolation valves are required to be closed during plant operation except as required for inerting, de-inerting and pressure control. These valves have been demonstrated capable of closing during a LOCA or steam line break accident from the full open position.

REPLACE WITH INSERT C

PROPOSED TECHNICAL SPECIFICATION INSERTS

INSERT A

With more than one drywell or suppression chamber purge system supply or exhaust butterfly isolation valve open, in any purge system primary containment penetration, for any purpose other than inerting, de-inerting or pressure control, close at least one of the isolation valves in the affected primary containment penetration within one hour or be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.

INSERT B

m. The requirements of Technical Specification 3.6.1.8 may also apply.

INSERT C

At least one of the drywell and suppression chamber purge system supply or exhaust isolation valves in each purge system primary containment penetration is required to be closed during plant operation except as required for inerting, de-inerting, and pressure control. These valves have been demonstrated to be capable of closing during a LOCA or steam line break accident from the full open position. The purge system is considered to be in operation whenever more than one of the purge system butterfly valves in any of the containment penetrations are open. When cycling the purge system butterfly isolation valves for preventive maintenance or testing purposes, one valve in each penetration shall remain closed while cycling the other valve in that penetration.

ATTACHMENT C

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 proposed amendment to the action requirements and bases for the drywell and suppression chamber purge (VQ) system (Technical Specification 3.6.1.8) will allow one primary containment isolation valve in each VQ system penetration to be open for an indefinite period of time. This will permit periodic cycling of the VQ system valves in accordance with the manufacturers recommendations without entry into a technical specification action statement. The VQ system is not a safety related system and is not required for mitigation of any accident evaluated in Chapter 15 of the UFSAR. Under normal operating conditions the VQ system penetrations are isolated with both valves in each penetration closed, except when the system is in operation. Each of these valves have an automatic isolation feature which will close the valve on a signal from the primary containment isolation system. Therefore, allowing one valve in each penetration to be open does not affect primary containment integrity. If a VQ system valve in a primary containment penetration is open and inoperable, continued operation of the unit would be governed by the action requirements for inoperable primary containment isolation valves in Technical Specification 3.6.3.

The proposed amendment to Technical Specification 3.6.3 for primary containment isolation valves, adds a footnote to Table 3.6.3-1 which provides a cross-reference to Technical Specification 3.6.1.8 for the VQ system valves. This change will help to ensure that the station operators are sensitive to the potential applicability of Specification 3.6.1.8 when a VQ butterfly valve is inoperable and open.

Additionally, the proposed amendment deletes Footnotes "***" from Technical Specification Table 3.6.3-1 for Unit 1. This footnote allowed relaxation of certain surveillance requirements during the Unit 1 Cycle 1. LaSalle Station Unit 1 is currently in cycle 4 and the footnote is no longer applicable and should be removed.

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

The proposed amendments do not involve any changes to the facility, or to the operation of the facility as described in the UFSAR.

ATTACHMENT C

SIGNIFICANT HAZARDS CONSIDERATION

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

The proposed amendments are administrative in nature. They help to clarify requirements of Specifications 3.6.1.8 and 3.6.3 and make these requirements more consistent. The proposed amendments will allow greater operational flexibility and allow periodic cycling of the VQ system valves in accordance with the manufacturers recommendations. This will help to enhance the reliability and availability of these valves.

Guidance has been provided in "Final Procedures and Standards on No Significant Hazards Consideration," Final Rule, 51 FR 7744, for the application of standards to license change requests for determination of the existence of significant hazards considerations. The proposed amendments most closely resemble example I.C.2.e.ii, a purely administrative change to the technical specification to achieve consistency.

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 CFR50.92(e), the proposed change does not constitute a significant hazards consideration.