



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

ENCLOSURE 1

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO THE FIRST TEN-YEAR INTERVAL INSERVICE INSPECTION

ADDITIONAL REQUESTS FOR RELIEF

COMMONWEALTH EDISON COMPANY

LASALLE COUNTY STATION, UNITS 1 AND 2

DOCKET NOS. 50-373 AND 50-374

1.0 INTRODUCTION

The Technical Specifications (TS) for LaSalle County Station, Units 1 and 2 state that the inservice inspection and testing of the American Society of Mechanical Engineers (ASME) Code Class 1, 2, and 3 components shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10 CFR 50.55a(g), except where specific written relief has been granted by the Commission pursuant to 10 CFR 50.55a(g)(6)(i). 10 CFR 50.55a(a)(3) states that alternatives to the requirements of paragraph (g) may be used, when authorized by the NRC, if (i) the proposed alternatives would provide an acceptable level of quality and safety, or (ii) compliance with the specified requirements would result in hardship or unusual difficulties without a compensating increase in the level of quality and safety.

Pursuant to 10 CFR 50.55a(g)(4), ASME Code Class 1, 2, and 3 components (including supports) shall meet the requirements, except the design and access provisions and the preservice examination requirements, set forth in the ASME Code, Section XI, "Rules for Inservice Inspection of Nuclear Power Plant Components," to the extent practical within the limitations of design, geometry, and materials of construction of the components. The regulations require that inservice examination of components and system pressure tests conducted during the first ten-year interval comply with the requirements in the latest edition and addenda of Section XI of the ASME Code incorporated by reference in 10 CFR 50.55a(b) on the date twelve months prior to the start of the 120-month interval, subject to the limitations and modifications listed therein. The applicable edition of Section XI of the ASME Code for the LaSalle County Station, Units 1 and 2 first ten-year inservice inspection (ISI) interval is the 1980 Edition, through winter 1980 Addenda. The components (including supports) may meet the requirements set forth in subsequent editions and addenda of the ASME Code incorporated by reference in 10 CFR 50.55a(b) subject to the limitations and modifications listed therein and subject to Commission approval.

Pursuant to 10 CFR 50.55a(g)(5), if the licensee determines that conformance with an examination requirement of Section XI of the ASME Code is not practical for its facility, information shall be submitted to the Commission in support of that determination and a request made for relief from the ASME Code requirement. After evaluation of the request, pursuant to 10 CFR 50.55a(g)(6)(i), the Commission may grant relief and may impose alternative requirements that are determined to be authorized by law, will not endanger life, property, or the common defense and security, and are otherwise in the public interest, giving due consideration to the burden upon the licensee that could result if the requirements were imposed. In letters dated August 4, 1993 and September 14, 1993, the licensee, Commonwealth Edison, submitted Relief Requests 25 through 30, for the first 10-year inservice inspection (ISI) interval that ends in January and October 1994, for Units 1 and 2, respectively.

## 2.0 EVALUATION AND CONCLUSIONS

The staff, with technical assistance from its contractor, the Idaho National Engineering Laboratory (INEL), has evaluated the information provided by the licensee in support of its additional requests for relief regarding the first ten-year ISI interval for LaSalle County Station, Units 1 and 2. Based on the information submitted, the staff adopts the contractor's conclusions and recommendations presented in the Technical Evaluation Summary attached. The staff concludes that for Relief Request Nos. 27, 28, and 30, the licensee's proposed tests provide reasonable assurance of continued component/system integrity and, therefore, pursuant to 10 CFR 50.55a(g)(6)(i), relief may be granted. For Relief Request No. 25, the licensee did not provide sufficient technical justification or a basis for proposing a test pressure at less than operating pressure to verify component integrity. Therefore, relief is denied. In Relief Request No. 26, the licensee requested relief from performing hydrostatic tests on Class 1 and 2 repaired/replacement components. This relief is presented on a generic basis and, therefore, relief is denied. In Relief Request No. 29, the licensee requested a relaxation of the pressure test requirement for Class 3 systems. Since Code Class 3 components and piping are not subject to other examinations and tests to verify system integrity, as Code Class 1 and 2 components and piping receive, this relief is denied.

Principal Contributor: T. McLellan, EMCB

Date: March 15, 1994