

Commonwealth Edison 1400 Opus Place Downers Grove, Illinois 60515

January 18, 1991

### U.S. Nuclear Regulatory Commission Attn: Document Control Desk Washington, D.C. 20555

Subject: LaSalle County Station Units 1 and 2 Application for Amendment to Facility Operating Licenses NPF-11 and NPF-18, Appendix A, Technical Specifications NRC Docket Nos. 50-373 and 50-374

### Gentlemen:

Pursuant to 10 CFR 50.90, Commonwealth Edison (CECo) proposes to amend Appendix A, Technical Specifications, of Facility Operating Licenses NPF-11 and NPF-18. The proposed amendment requests two changes to the Technical Specifications Administrative Controls Section 6 to (1) accommodate a CECo Nuclear Operations Department title change from "Assistant Vice President Quality Programs and Assessment" to "General Manager Quality Programs and Assessment" and (2) to allow for consistent practices throughout all CECo stations in regards to the Station Control Room Engineer Position (SCRE).

This proposed amendment request is subdivided as follows:

- 1. Attachment A gives a description and safety analysis of the proposed changes in this amendment.
- Attachment B includes the marked-up Technical Specifications pages with the requested changes indicated.
- Attachment C describes CECo's evaluation performed in accordance with 10 CFR 50.92 (c), which confirms that no significant hazards consideration is involved.
- Attachment D provides the Environmental Assessment.

This proposed amendment has been reviewed and approved by CECo onsite and offsite review in accordance with Commonwealth Edison procedures.

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Commonwealth Edison is notifying the State of Illinois of this application for amendment by transmitting a copy of this letter and its attachments to the designated state official.

Please direct any questions you may have concerning this submittal to this office.

Very truly yours,

Wayne E Morgan

W.E. Morgan Nuclear Licensing Administrator

Attachments:

- A. Description of Safety Analysis of the Proposed Changes
- B. Marked-Up Technical Specification Pages
- C. Evaluation of Significant Hazards Considerations
- D. Environmental Assessment
- cc: A.B. Davis Regional Administrator, RIII Senior Resident Inspector - LSCS John Hickman - NRR, Project Manager Office of Nuclear Facility Safety - IDNS

WM:Imw ZNLD654/8-9

Signed before me on this 1/	day
of January, 1991	방법에서 영화되었다. 김정 문제
by Syn M Modaus Notary Public	" OFFICIAL SEAL " LYNN M. WLODARSKI NOTARY PUBLIC, STATE OF ILLINOIS MY COMMISSION EXPIRES 6/25/94

### ATTACHMENT A

# Description and Bases Of The Proposed Changes

### Description

This amendment request addresses two administrative changes affecting Section 6 of the Technical Specifications.

The first change involves a title change. The Assistant Vice President Quality Programs and Assessment title has been changed to the General Manager Quality Programs and Assessment. The scope and responsibilities of the position remain unaffected.

The second change is intended to clarify the Station Control Room Engineer (SCRE) to Shift Technical Advisor (STA) formal turnover. This will allow consistent practices to exist throughout all Commonwealth Edison Stations in regards to the SCRE/STA position.

## Bases Of The Proposed Changes

The proposed changes are administrative in nature and do not alter or affect the safety function of any component or system as described in the Updated Final Safety Analysis Report. Additionally, they do not change the manner in which installed equipment is operated, nor do they add any new or different equipment to plant operations.

The first proposed change is a title change from Assistant Vice President Quality Programs and Assessment to General Manager Quality Programs and Assessment. The change is a change in title only and the scope and responsibility of the position remain unchanged. Therefore there is no change in the off-site corporate support to LaSalle Station as a result of this title change.

The second change which is to clarify the SCRE to STA formal turnover is being requested to allow consistent practices to be established for all Commonwealth Edison Stations. Currently the LaSalle Technical Specifications states that "In the event of abnormal operating or accident conditions, the SCRE will relinguish his job as Control Room SRO to the shift foreman and will assume the role of STA". This wording implies that the SCRE is the only individual who can serve as the STA.

To be consistent with the wording of Commonwealth Edison's Byron and Braidwood Plants, it is being proposed that the wording be revised as follows: The Station Control Room Engineer (SCRE) may serve as the Shift Technical Advisor during abnormal operating and accident conditions. During these conditions, the SCRE or other on duty STA shall provide technical support ...".

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The proposed revision provides flexibility so that it can not be implied that the SCRE is the only individual who can perform the STA function during abnormal operating and accident conditions. As always, the individual designated as the STA will be subject to the requirements and qualifications of the STA position.

In the event of an abnormal or accident situation, the shift supervisor (SRO) will still assume the position of Control Room SRO that was previously held by the SCRE/STA as soon as practicable, as determined by the shift supervisor. This relinquishment of Control Room supervision will be controlled by the stations administrative procedures.

To minimize the impact of the shortcomings of the SCRE/STA position as outlined in the LaSalle Safety Evaluation Report dated March 1981 Section 22.2/I.A.1.1. LaSalle is proposing to include in the Technical Specifications to assure capability for performance of all STA functions the following:

- a. The shift foreman (SRO) shall participate in the SCRE shift relief turnover.
- b. During the shift, the shift engineer and the shift foreman (SRO) shall be made aware of any significant changes in plant status in a timely manner by the SCRE.
- c. During the shift, the shift engineer and the shift foreman (SRO) shall remain abreast of the current plant status. The shift foreman (SRO) shall return to the control room two or three times per shift, where practicable, to confer with the SCRE regarding plant status. Where not practical to return to the control room, the shift foreman (SRO) shall periodically check with the SCRE for a plant status update. The shift foreman (SRO) shall not abandon duties critical to reactor operation, unless specifically ordered by the shift engineer.

Since the proposed changes are administrative in nature and do not involve changes to plant equipment or actual shift manning, the previous safety analysis and assumptions in the UFSAR remain bounding.

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