



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 94 TO FACILITY OPERATING LICENSE NO. NPF-11 AND
AMENDMENT NO. 78 TO FACILITY OPERATING LICENSE NO. NPF-18
COMMONWEALTH EDISON COMPANY
LASALLE COUNTY STATION, UNITS 1 AND 2
DOCKET NOS. 50-373 AND 50-374

1.0 INTRODUCTION

By letter dated December 15, 1989, as supplemented September 16, 1992, the Commonwealth Edison Company (CECo or the licensee) requested amendments to Facility Operating License Nos. NPF-11 and NPF-18 for the LaSalle County Station, Units 1 and 2. The proposed amendments would change the plant Technical Specifications (TSs) based on recommendations provided by the staff in Generic Letter (GL) 87-09, "Sections 3.0 and 4.0 of the Standard Technical Specifications (STS) on the Applicability of Limiting Conditions for Operation and Surveillance Requirements," related to the applicability of limiting conditions for operations (LCO) and the surveillance requirements of TS 3.0 and 4.0.

Specifically, the licensee has requested the following revisions to TS 3.0.4, 4.0.3 and 4.0.4:

- (1) Specification 3.0.4 is revised to define when its provisions apply; i.e., when the affected ACTION statements permit continued operation for an unlimited period of time, instead of defining when the provisions of Specification 3.0.4 do not apply.
- (2) Specification 4.0.3 is revised to incorporate a 24-hour delay in implementing ACTION requirements due to a missed surveillance when the ACTION requirements provide a restoration time that is less than 24 hours.
- (3) Specification 4.0.4 is revised to clarify that "This provision shall not prevent passage through or to OPERATIONAL CONDITIONS as required to comply with ACTION requirements."

Due to the issuance of TS Amendments 85 and 88 for Unit 1, and 69 and 73 for Unit 2, certain TS pages that the licensee requested be revised are not addressed due to the above mentioned amendments superceding this amendment request.

2.0 EVALUATION

The changes proposed by the licensee have been reviewed considering the limitations set forth in GL 87-09 for TS 3.0.4, 4.0.3 and 4.0.4 as follows.

2.1 Specification 3.0.4

GL 87-09 recognizes, in part, that Specification 3.0.4 unduly restricts facility operation when conformance with the ACTION requirements provides an acceptable level of safety for continued operation in any mode. For an LCO that has ACTION requirements permitting continued operation for an unlimited period of time, entry into an operational mode or other specified condition of operation should be permitted in accordance with those ACTION requirements. The restriction on changes in operational modes or other specified conditions should apply only where the ACTION requirements establish a specified time interval in which the LCO must be met or a shutdown of the facility would be required, or where entry into that operational mode would result in entry into an ACTION statement with such time constraints. However, the staff position stated in GL 87-09 should not be interpreted as endorsing or encouraging plant startup with inoperable equipment. GL 87-09 states explicitly that startup with inoperable equipment should be the exception, rather than the rule.

The licensee has provided confirmation that the remedial measures prescribed by the ACTION statement for each change involving Specification 3.0.4 is consistent with the Updated Safety Analysis Report (UFSAR) and its supporting safety analyses. In their September 16, 1992, letter the licensee provided confirmation and certification that appropriate administrative controls and procedures are in place for limiting the use of exceptions to Specification 3.0.4. Additionally, no changes are proposed that affect plant configuration, setpoints, operating parameters, or the operator/equipment interface.

Based on our review of the licensee's proposal and confirmation, as discussed above, we conclude in granting the exceptions to TS 3.0.4 proposed by the licensee in response to GL 87-09 that: (1) the remedial measures prescribed by the ACTION statement for each change involving the applicability of the Specification 3.0.4 exception should provide a sufficient level of protection to permit operational mode changes and safe long-term operation consistent with the plant's UFSAR; and (2) the licensee has established adequate administrative controls and procedures which will ensure that startup of the plant with important safety features inoperable will be an infrequent occurrence.

We, therefore, find the following change to Specification 3.0.4 proposed by the licensee to be acceptable:

"Entry into an OPERATIONAL CONDITION or other specified CONDITION shall not be made when the conditions for the Limiting Conditions for Operations are not met and the associated ACTION requires a shutdown if they are not met within a specified time interval. Entry into an OPERATIONAL CONDITION may be made in accordance with ACTION requirements

when conformance to them permits continued operation of the facility for an unlimited period of time."

2.2 Specification 4.0.3

In GL 87-09, the staff stated that it is overly conservative to assume that systems or components are inoperable when a surveillance requirement has not been performed, because the vast majority of surveillances demonstrate that systems or components in fact are operable. Because the allowable outage time limits of some ACTION requirements do not provide an appropriate time limit for performing a missed surveillance before shutdown requirements apply, the TS should include a time limit that would allow a delay of the required actions to permit the performance of the missed surveillance.

This time limit should be based on consideration of plant conditions, adequate planning, availability of personnel, the time required to perform the surveillance, as well as the safety significance of the delay in completion of the surveillance. After reviewing possible limits, the staff concluded that, based on these considerations, 24 hours would be an acceptable time limit for completing a missed surveillance when the allowable outage times of the ACTION requirements are less than this time limit or when shutdown ACTION requirements apply. The 24-hour time limit would balance the risks associated with an allowance for completing the surveillance within this period against the risks associated with the potential for a plant upset and challenge to safety systems when the alternative is a shutdown to comply with ACTION requirements before the surveillance can be completed.

This limit does not waive compliance with Specification 4.0.3. Under Specification 4.0.3, the failure to perform a surveillance requirement will continue to constitute noncompliance with the operability requirements of an LCO and to bring into play the applicable ACTION requirements.

Based on the above, the following change to Specification 4.0.3 is acceptable:

"Failure to perform a Surveillance Requirement within the allowed surveillance interval, defined by Specification 4.0.2, shall constitute noncompliance with the OPERABILITY requirements for a Limiting Condition for Operation. The time limits of the ACTION requirements are applicable at the time it is identified that a Surveillance Requirement has not been performed. The ACTION requirements may be delayed for up to 24 hours to permit the completion of the surveillance when the allowable outage time limits of the ACTION requirements are less than 24 hours."

2.3 Specification 4.0.4

TS 4.0.4 prohibits entry into an OPERATIONAL CONDITION or other specified condition until all required surveillances have been performed. This could cause an interpretation problem when OPERATIONAL CONDITION changes are required in order to comply with ACTION statements. Specifically, two

possible conflicts between TSs 4.0.3 and 4.0.4 could exist. The first conflict arises because TS 4.0.4 prohibits entry into an operational mode or other specified condition when surveillance requirements have not been performed within the specified surveillance interval. CECO's proposed modification to resolve this conflict involves the revision to TS 4.0.3 to permit a delay of up to 24 hours in the application of the ACTION requirements, as explained above, and a clarification of TS 4.0.4 to allow passage through or to operational modes as required to comply with ACTION requirements. The second potential conflict between TS 4.0.3 and 4.0.4 arises because an exception to the requirements of 4.0.4 is allowed when surveillance requirements can only be completed after entry into a mode or condition. However, after entry into this mode or condition, the requirements of TS 4.0.3 may not be met because the surveillance requirements may not have been performed within the allowable surveillance interval.

The licensee proposes to resolve these conflicts by providing the following clarifying statement to TS 4.0.4:

"This provision shall not prevent passage through or to OPERATIONAL CONDITIONS as required to comply with ACTION requirements."

The NRC has provided in GL 87-09 a clarification that: (a) it is not the intent of TS 4.0.3 that the ACTION requirements preclude the performance of surveillances allowed under any exception to TS 4.0.4; and (b) that the delay of up to 24 hours in TS 4.0.3 for the applicability of ACTION requirements provides an appropriate time limit for the completion of surveillance requirements that become applicable as a consequence of any exception to TS 4.0.4.

Consequently, we find the proposed changes to TS 4.0.4 acceptable.

3.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Illinois State official was notified of the proposed issuance of the amendments. The State official had no comments.

4.0 ENVIRONMENTAL CONSIDERATION

The amendments change a requirement with respect to the installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20 and change surveillance requirements. The NRC staff has determined that the amendments involve no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendments involve no significant hazards consideration, and there has been no public comment on such finding (57 FR 53785). Accordingly, the amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR

51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendments.

5.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendments will not be inimical to the common defense and security or to the health and safety of the public.

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Date: February 24, 1994