



Commonwealth Edison

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November 18, 1982

Mr. A. Schwencer, Chief
Licensing Branch #2
Division of Licensing
U. S. Nuclear Regulatory Commission
Washington, DC 20555

Subject: LaSalle County Station Unit 1
Requirement for Inerting
Primary Containment
NRC Docket No. 50-373

- References (a): Generic Letter 82-17, Inconsistency
Between Requirements of 10 CFR 50.54(t)
and Standard Technical Specifications
for Performing Audits of Emergency
Preparedness Programs.
- (b): Generic Letter 82-23, Inconsistency
Between Requirements of 10 CFR 73.40(d)
and Standard Technical Specifications
for Performing Audits of Safeguards
Contingency Plans (Security Plan).
- (c): 10 CFR 50.44 Standards for Combustible
Gas Control System in Light Water Cooled
Power Reactors, Section 50.44.(c).(3).(i).
- (d): LaSalle County Station Technical Specification
3.6.6.2, Drywell and Suppression Chamber
Oxygen Concentration.
- (e): LaSalle County Station Technical Specification
3.10.5, Special Test Exception Oxygen
Concentration.

Dear Mr. Schwencer:

The NRC has recently issued References (a) and (b) which indicate inconsistencies between the Standard Technical Specifications and specific audit requirements per 10 CFR. The NRC has indicated that, notwithstanding the Technical Specifications issued by the NRC, the 10 CFR requirements must also be met because the Technical Specifications in these two cases were not meant as exceptions or exemptions.

Reference (c) states, in part, that "Effective May 4, 1982 or 6 months after initial criticality, whichever is later, an inerted atmosphere shall be provided for each boiling light-water nuclear power reactor with a Mark I or Mark II type containment..."

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Reference (d) requires that drywell and suppression chamber atmosphere oxygen concentration shall be less than 4% by volume during the time period from within 24 hours after exceeding 15% rated thermal power to within 24 hours prior to reducing the thermal power to less than 15% rated thermal power.

Reference (e) grants a special test exception that Reference (d) requirements may be suspended during the performance of the startup test program until either the required 100% rated thermal power trip test has been completed or the reactor has operated for 120 Effective Full Power Days.

The purpose of this letter is to assure that, in licensing LaSalle County Station, it was and continues to be the NRC position that the LaSalle County Station Technical Specifications regarding inerting are governing and were issued as specific exceptions and exemptions to the requirements of Reference (c). As you are aware, LaSalle County Station Unit 1 performed its initial critical on June 21, 1982. Unless the NRC staff notifies Commonwealth Edison to the contrary, it is Commonwealth Edison Company's intention to perform inerting in accordance with license NPF-11 and the attendant Technical Specifications.

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

Enclosed for your use are one (1) signed original and forty (40) copies of this letter.

Very truly yours,

CW Schroeder 11/18/82

C. W. Schroeder
Nuclear Licensing Administrator

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cc: NRC Resident Inspector - LSCS
P. P. Steptoe - IL&B

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