

Commonwealth Edison One First National Plaza, Chicago, Illinois Address Reply to: Post Office Box 767 Chicago, Illinois 60690

August 2, 1983

Mr. Harold R. Denton, Director Office of Nuclear Reactor Regulation U.S. Nuclear Regulatory Commission Washington, DC 20555

> Subject: LaSalle County Station Units 1 and 2 Response to NRC Generic Letter 83-24 Special Low Power Testing and Training NRC Docket Nos. 50-373 and 50-374

References (a): NRC Generic Letter 83-24.

(b): NPF-11, License Condition 2.C.(30.(e).

Dear Mr. Denton:

Reference (a) supersedes NRC generic letter 81-04 which treated the station blackout issued (A-44) via a dedicated test. The recent letter acknowledged that the earlier treatment could not be applied to BWR's in a manner equivalent to that given the PWR's, thus in the second generic letter the Commission relieved the initial requirement.

LaSalle had pursued the original objective via an evaluation of plant response to a station blackout, by a delineation of the compromises and inadequacies of a dedicated blackout test, and by a definition of what practical testing could be done to confirm performance predictions and to attain plant data for use in a training simulation for familiarization of operators to the blackout situation. That appraisal is included in the attached report where the Commission's conclusion that the blackout test should not be performed is specifically confirmed to be applicable for LaSalle. The reasons for this conclusion are included.

Also, a variation on Startup Test STP-31 at LaSalle was investigated to show that the constraints and risk ascribed to such a test do not justify its performance because of time constraints that preclude any training opportunity.

The third section of the attached report outlines Edison's segmented test approach for verification of station parameters associated with loss of AC power. These test options are suggested alternates in the context of possible LaSalle specific tests from which plant performance parameters could be determined for use in the LaSalle training simulations. These few additional measurements can be added to plant performance values already accumulated from preoperational and startup tests for use in training simulations which are not time constrained as far as operator observation/part; ipation is concerned. By this approach, we believe that the training obj ive of IGL can be accomplished for LaSalle.

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Reference (a) concluded: "The remaining two holders of operating licenses (i.e., for Grand Gulf and LaSalle) must provide a similar response to this letter for consideration in deleting the SBO test condition cited in their operating license." <u>Commonwealth Edison Company</u> has prepared the enclosed report to address this request, and hereby requests that the NRC delete Reference (b).

To the best of my knowledge and belief the statements contained herein and in the attachment are true and correct. In some respects these statements are not based on my personal knowledge but upon information furnished by other Commonwealth Edison employees and consultants. Such information has been reviewed in accordance with Company practice and I believe it to be reliable.

Enclosed for your use please find one (1) signed original, nine (9) copies of this letter, and ten (10) copies of the enclosure.

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

Very truly yours,

WAchinda 8/2/83

C. W. Schroeder Nuclear Licensing Adminstrator

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cc: NRC Resident Inspector - LSCS 1/0

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