



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION III  
799 ROOSEVELT ROAD  
GLEN ELLYN, ILLINOIS 60137

August 5, 1983

MEMORANDUM FOR: R. D. Walker, Chief, Projects Section 2C

FROM: W. G. Guldemon, Senior Resident Inspector  
LaSalle County Station

SUBJECT: REPORT ON A MEETING WITH COMMONWEALTH EDISON ON  
PREOPERATIONAL TEST DEFERRALS

In a letter from Mr. Cordell Reed (Commonwealth Edison) to Mr. Harold Denton (NRC) dated July 21, 1983 (copy attached), the licensee requested approval to defer the completion of 17 preoperational tests and three system demonstrations until after fuel loading. The stated reason for the deferral request was that certain portions of a number of preoperational tests and system demonstrations had become controlling items for fuel load and that delays in completing these tests were due to a variety of design, delivery, and installation problems. The justification for the tests selected for deferral was that based on a review of the tests against Unit 1 Technical Specifications the affected systems have no impact on plant safety during shutdown and fuel loading conditions.

On August 3, 1983, a meeting was convened in Bethesda, Maryland at the request of the Office of Nuclear Reactor Regulation with the licensee to discuss the July 21, 1983 submittal. The attached meeting notice lists the attendees and the meeting agenda.

During the course of the meeting, the following information was presented and conclusions were reached:

- a. The licensee stated that the list of tests for which they were requesting deferrals was conservative in that it represented the maximum number of tests for which deferrals would be required. They further stated that with two exceptions, all of the tests were in progress and would continue to be worked on prior to fuel load and that it was anticipated that many of the tests would be completed prior to fuel load.

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- b. The licensee stated that they anticipated that the Unit 1 startup testing program would be essentially complete prior to Unit 2 fuel load but that should that not be the case, sufficient manpower was available to conduct both activities simultaneously.
- c. The licensee stated that as of July 28, 1983, there were a total of 1380 station construction and preoperational test deficiencies for Unit 2. They noted that this number was significantly lower than the number of deficiencies on Unit 1 at the same point of construction and that, in their opinion, they were clearing deficiencies much more rapidly than for Unit 1.
- d. The licensee stated that they have approximately 75 licensed individuals (RO's and SRO's) and that if these people are provided Unit 2 licenses based on their Unit 1 experience, sufficient numbers of licensed individuals would be available to support dual unit operations. They further stated that licensed Unit 1 operators were currently rotating through Unit 2 operator positions.
- e. The licensee stated that the large bore pipe heat treating program was expected to be complete on August 5, 1983.
- f. The LaSalle Senior Resident Inspector questioned whether sufficient instrument mechanics were available to support dual unit operation plus the additional burdens associated with testing and initializing the Unit 2 surveillance program. The licensee stated that they currently did not have enough instrument mechanics on their staff and it may take two to three years to get the necessary complement. In the interim, they are considering use of a contractor to supplement their complement of instrument mechanics.
- g. Mr. Novak stated that NRR did not have any particular technical problems with the requested deferrals; however, he cautioned the licensee against creating a situation wherein they would be trying to conduct so many activities in parallel that they might experience problems effectively managing all of the efforts.

- h. Mr. Novak and Mr. Schwencer impressed upon the licensee representatives that should they get a license to load fuel in Unit 2, they would likely lose much operational flexibility and that they may well end up expending more time due to this loss of flexibility than they might save by deferring certain preoperational tests. It was further noted that given recent decisions on licensing actions, it would be difficult to process license changes to restore some measures of flexibility.
- i. It was concluded that the licensee's request for testing deferrals was not unreasonable; however, approval of deferrals would not be given until Unit 2 was closer to licensee issuance and the impact of the deferrals could more readily be assessed. It was suggested that additional meetings on this subject should be conducted.

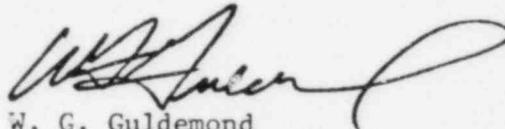
Subsequent to the August 3, 1983 meeting, the LaSalle Senior Resident Inspector performed a detailed review of the abstracts for the tests on which deferral was requested and compared those abstracts to Unit 1 Technical Specification requirements for modes 4 and 5. The following items were identified which could impact the acceptability of deferring certain tests:

- a. Technical Specification 3.5.3 requires that the suppression chamber be operable with a contained water volume of 70,000 ft<sup>3</sup> corresponding to 14' of level in modes 4 and 5 unless no operations are in progress that have the potential of draining the reactor vessel, the mode switch is locked in the shutdown or refuel position, the condensate storage tank (CST) contains 135,000 available gallons of water, and the HPCS system is operable and capable of taking a suction from the CST. Suppression pool level is required to be checked every 12 hours and two level instruments are required to be operable.

The preoperational test of suppression pool level instrumentation is performed as part of PT-CM-201. The licensee is requesting deferral of this test.

- b. Technical Specification 3.7.7 requires that area temperatures be maintained within certain limits in areas where certain equipment is required to be operable. Normally, verification of this requirement is made using the area temperature monitoring system. This system's preoperational test is performed as part of PT-LD-201. The licensee is requesting deferral of this test.

On August 5, 1983, the Senior Resident Inspector questioned the Assistant Technical Staff Supervisor to determine what design, delivery, and installation problems were being encountered that would necessitate the requested deferrals. He stated that they were experiencing difficulty obtaining replacements for those parts found deficient during testing citing specifically valve and pump diaphragms in the containment monitoring system. The only design impact he was aware of was a change to the drywell ventilation system to improve heat removal capability. The changes were prompted by problems encountered in Unit 1.



W. G. Guldemon  
Senior Resident Inspector  
LaSalle County Station

Enclosure:

1. Letter
2. Meeting Notice

cc w/encl.:

J. G. Keppler  
C. E. Norelius  
J. F. Streeter



## AGENDA

1. Review Preop Tests to be deferred
2. Unit 1 startup program status and expected completion date
3. Discrepancies of Preop Tests
4. Status of licensed operators
5. Schedule of heat treating large bore piping
6. Discuss overall manpower availability at the site



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

July 21, 1983

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

Subject: LaSalle County Station Unit 2  
Completion of LSCS Unit 2  
Preoperational Test Program  
NRC Docket No. 50-374

- / References (a): LSCS FSAR Chapter 14.
- (b): LSCS Unit 1 Technical Specifications,  
License NPF-11.
- (c): D. G. Eisenhut letter to L. O. DelGeorge  
dated May 3, 1982.
- (d): W. L. Stiede letter to H. R. Denton  
dated June 21, 1983.

Dear Mr. Denton:

Reference (a) describes the LSCS preoperational and startup test program. Commonwealth Edison Company's original intentions were to complete the entire preoperational test program prior to fuel load. However, it has become apparent that certain portions of a relatively small number of preoperational tests and system demonstrations have become the controlling items for fuel load. The delays in completing these tests are due to a variety of design, delivery, and installation problems.

Commonwealth Edison has reviewed the remaining preoperational testing, considering both the safety aspects of the individual systems and the anticipated system completion dates. Several of the systems and subsystems involved have been determined to have no impact on plant safety during shutdown and fuel loading conditions. This determination is based on the Unit 1 Technical Specifications (Reference (b)), and, where the Technical Specifications have no specific requirements, prudent judgment. The Unit 1 Technical Specifications were used because of the fluid state of the proposed Unit 2 Specifications; however, no differences between the two are expected to affect the justifications provided.

The Attachment presents the results of Commonwealth Edison's review and justification that these systems and subsystems should not be required to be tested or operable as a prerequisite for fuel load. It is requested that approval be granted to defer the completion of the

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preoperational tests listed on the Attachment beyond fuel load. With the exception of Primary Containment Isolation and Process Sampling, no parts of any of the systems listed are required. For these two tests, test evaluations will be completed prior to fuel load to ensure the adequacy of the portions of the systems required to support fuel load.

It should be noted that in a majority of cases it is anticipated that the physical testing will be completed prior to fuel load. The delay in the date required for test completion will allow additional time to ensure a thorough evaluation and review of the test results. Also included on the Attachment are the appropriate milestones in the Startup Test Program prior to which the tests and test evaluations must be completed.

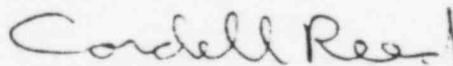
A review of Chapter 14 of the FSAR has revealed that several of the startup test abstracts list, as an Initial Condition, "All construction and preoperational testing completed." Approval by the NRC to defer completion of preoperational tests is understood to include authorization to deviate from this startup test prerequisite until the specified milestone is attained.

Reference (c) extended the expiration of the Unit 2 Construction Permit CPPR-100 to September 30, 1983. Reference (d) stated that our review of the schedule of construction activities and preoperational testing indicated that fuel can be loaded in LaSalle County Unit 2 not later than October 1, 1983. This determination remains unchanged. Commonwealth Edison Company requests that the NRC provide a prompt review and approval of this preoperational test deferral request so that priorities and schedules may be implemented to assure that our license will be issued prior to Construction Permit CPPR-100 expiration and fuel load will be allowed to commence in September, 1983.

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

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

Very truly yours,



Cordell Reed  
Vice-President

*CWB*  
CWS/lm

cc: A. Bournia (Fed. Express)  
J. G. Keppler - RIII  
NRC Resident Inspector - LSCS

Requested Preoperational Test Program Exceptions

<u>TEST</u>	<u>TEST SECTIONS</u>	<u>JUSTIFICATION</u>	<u>COMPLETION REQUIRED PRIOR TO</u>
PT-CM-201 Containment Monitoring	ALL	No equipment in this test is required operable during cold shutdown or refueling operations.	Initial Criticality
PT-CM-202 Post LOCA Containment Monitoring	ALL	No equipment in this test is required operable during cold shutdown or refueling operations.	Initial Criticality
PT-IN201 Drywell Pneumatics	ALL	No equipment operated by drywell pneumatics is required operable during cold shutdown or refueling operations.	Initial Criticality
PT-LD201 Leakage Detection	ALL	No leakage detection equipment is required operable during cold shutdown or refueling operations.	Initial Criticality
PT-MS201A MSIV Leakage Control System	ALL	The MSIV Leakage Control System is not required operable during cold shutdown or refueling operations.	Initial Criticality
PT-MS201B MSIV's and MS Instrumentation	ALL	No equipment in this test is required operable during cold shutdown or refueling operations.	Initial Criticality
PT-MS201C ADS and MS Safety/Relief	ALL	No equipment in this system is required to be operable until the reactor is critical and above 122 psig. Per FSAR Chapter 14, this test is to be finished during heatup in the startup test program.	Initial Heatup, prior to exceeding 122 psig.

<u>TEST</u>	<u>TEST SECTIONS</u>	<u>JUSTIFICATION</u>	<u>PROPOSED COMPLETION</u>
PT-NR202 Traversing Incore Probe	ALL	No equipment in this system is required during cold shutdown or refueling operations.	Initial Criticality
PT-OG201 Off-Gas	ALL	No equipment in this system is required during cold shutdown or refueling operations.	Initial Criticality
PT-PC201 Primary Containment Integrity	ALL	Primary Containment Integrity is not required during cold shutdown or refueling operations.	Initial Criticality
PT-PC203 Containment Isolation Systems	Everything except Secondary Containment Isolations	Only secondary containment integrity is required during refueling operations. Primary containment cannot be maintained while fueling.	Initial Criticality
PT-RI201 Reactor Core Isolation Cooling	ALL	No equipment in this system is required during cold shutdown or refueling operations.	Initial Criticality
PT-RP202 Remote Shutdown	ALL	The remote shutdown system is not required during cold shutdown or refueling operations.	Initial Criticality
PT-RR201 Reactor Recirculation	ALL	The reactor recirculation and flow control system is not required operable during cold shutdown or refueling operations.	Initial Criticality

<u>TEST</u>	<u>TEST SECTIONS</u>	<u>JUSTIFICATION</u>	<u>PROPOSED COMPLETION</u>
PT-SI202 Pipe Vibration Monitoring	ALL	The probability of a severe transient (e.g., seismic, LOCA) occurring during the preoperational test program that could damage system piping or components if the dynamic restraints are not installed is acceptably low; and the testing will be completed prior to power operation which would generate decay heat and fission product inventory. Therefore, the use of these systems will not be required to protect the health and safety of the public prior to the tests.	Initial Heat-up
PT-VP202 Post LOCA Hydrogen Recombiners	Portions involving Unit 2 (Both recombiners have been demonstrated with the Unit 1 containment	The hydrogen recombiner are not required to support Unit 2 during cold shutdown and refueling operations.	Initial Criticality
PT-VP203 Containment Ventilation	ALL	Containment ventilation is not required to maintain temperatures until after reactor heatup has occurred and the reactor is adding heat to the containment.	Initial Heat-up
SD-PS201 Process Sampling	All portions other than those necessary to monitor reactor water quality	No requirements exist to maintain water quality other than for the reactor water.	Initial Criticality
SD-SA201 Service and Instrument Air	ALL	This system is non-safety related. Although it supplies some safety-related components, they are designed to fail in the conservative direction upon loss of air. This system has been in operation for a year, and has been a reliable air source.	Initial Criticality
SD-SI201	ALL	For the same reasons as applied to PT-SI202 (above).	Initial Heat-up