



Commonwealth Edison
1400 Opus Place
Downers Grove, Illinois 60515

January 24, 1992

Dr. Thomas E. Murley, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Attn: Document Control Desk

Subject: Commonwealth Edison Response to Generic Letter 91-11
for LaSalle County Station

LaSalle Units 1 and 2, NRC Docket Numbers 50-373 and 50-347

Reference: Generic Letter 91-11, "Resolution of Generic Issues 48,
LCOs for Class 1E Vital Instrument Buses, and 49,
Interlocks and LCOs for Class 1E Tie Breakers",
dated July 18, 1991.

Dear Dr. Murley:

Generic letter 91-11 was issued as part of the resolution of Generic Issue 128, "Electrical Power Reliability". The Generic Issues (GI-48 and GI-49) addressed by this letter involve vital AC buses and tie breakers. Specifically the Generic Letter recommends that nuclear plants ensure that procedures are in place that include time limitations and surveillance requirements for the following: vital instrument buses (VIBs), inverters to VIBs, and tie breakers that can connect redundant class 1E buses (AC or DC) at one unit or that can connect Class 1E buses between units at the same site.

Commonwealth Edison (CECo) has reviewed Generic Letter 91-11 and has determined that LaSalle County Station (LaSalle) is in compliance with the Letter's recommendations. The following evaluates the Generic Letter issues against LaSalle's Class 1E AC and DC electrical distribution system.

Time Limitations and Surveillances for Vital Instrument Buses (VIBs) and Inverters or Other Onsite Power Sources to the VIBs

At LaSalle, most AC/DC vital instrumentation and ESF logic are fed from Class 1E 120/208 VAC/125 VDC distribution panels that are part of the Class 1E divisional distribution system. The 1E distribution system is required to be operable and energized by Technical Specification LCO 3.8.2.1 and 3.8.2.3 with appropriate Allowed Outage Times and surveillances. The Class 1E AC divisions, controlled by 3.8.2.1, have an eight hour LCO. The Class 1E DC divisions, controlled by the 3.8.2.3 specification have a 2 hour LCO. These buses cannot be cross-tied to a redundant division.

The Division 1 and 2 AC buses can be tied to the opposite unit Division 1 and 2 buses, respectively, on the 4.16 KV level via Unit-tie Breakers. This arrangement is controlled with LCOs, actions, and surveillances established by Technical Specification 3.8.2.1.

The 125 VDC Divisional buses can be cross-tied on the respective division 125 VDC buses on the opposite unit. The 125 VDC bus cross-ties are administratively controlled by Technical Specification 3.8.2.3 which limits the time that the cross-tie is allowed.

The remaining AC vital instrumentation is designed to be "fail-safe" and is fed from the Reactor Protection System (RPS) buses. Each bus (A and B) is fed by a motor generator through Safety Related Power Monitoring Assemblies (PMAs).

Therefore, LaSalle's vital instrument buses meet the requirements of the Generic Letter.

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Time Limitations and Surveillances for Tie Breakers Connecting Common Unit 1E Buses (AC or DC).

The Class 1E Divisions 1 and 2 are the only buses on each unit that can be cross-tied to other buses. Each bus has a bus-tie breaker that connects it with a non-class-1E bus, which is fed from the Unit Auxillary Transformer (UAT). The associated Class 1E bus is fed by the System Auxillary Transformer (SAT). The 1E to non 1E bus-tie breakers automatically trip on undervoltage and thus may be either open or closed without violation of the single-failure criteria. Proper breaker alignment is verified by Technical Specification surveillance at least once every seven days per Technical Specification 4.8.2.1. Technical Specification 3.8.2.1 limits the time breakers can be misaligned by this required surveillance, and proper alignment is controlled by procedure.

Time Limitations and Surveillance for Tie Breakers Connecting Unit 1E Buses (AC or DC) Between Units.

Division 1 and 2 Class 1E buses each can be cross-tied to respective Division 1 and 2 buses on the opposite unit via unit-tie breakers (one per bus, two breakers in series). There are appropriate interlocks and alarms associated with closing of the unit-tie breakers and the buses and breakers and SATs are sized to provide the total auxillary power for one unit plus the engineered safety features auxillary power for the other unit. This meets the requirements of General Design Criteria 17.

The 125 VDC distribution system breaker alignment is controlled by procedure with verification of proper alignment required by Technical Specification 4.8.2.3.1 at least once per seven days. The 250 VDC distribution system breaker alignment is also controlled by procedure with verification of proper alignment required by Technical Specification 4.7.3.d.1.a at least once per seven days. The DC cross-tie breakers (one per bus, two breakers in series) are used for ground isolation and maintenance activities. This maintenance arrangement is considered by procedure to be an abnormal breaker alignment and the appropriate Technical Specification Action statements are applied to limit their use.

Based on the above information, CECo concludes that LaSalle's Technical Specifications for AC and DC distribution systems provide controls that assure the recommendations of Generic Letter 91-11 are met.

To the best of knowledge and belief, the statements contained in this document are true and correct. In some respect these statements are not based on personal knowledge, but on information furnished by other CECo employees, contractor employees, and consultants. Such information has been reviewed in accordance with Company practice, and I believe it to be reliable.

If there are any questions or comments, please contact me at (708) 515-7262.

Sincerely,



David J. Chrzanowski
Nuclear Licensing Administrator
Generic Issues

- cc: A. Bert Davis, Regional Administrator-RIII
- B. Siegel, Project Manager-NRR
- R. Elliott, Project Engineer-NRR
- Senior Resident Inspector, LaSalle

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State of Ill, County of Cook
 Signed before me on this 24th day
 of January, 1992, by [Signature]
 Notary Public [Signature]

