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 1400 Opus Place  
 Downers Grove, Illinois 60515

January 3, 1992

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

Attn: Document Control Desk

Subject: LaSalle County Station Units 1 and 2  
 In-Service Testing (IST) Program Relief Request RV-19  
 NRC Docket Nos. 50-373 and 50-374

Reference: (a) W.E. Morgan letter to T.E. Murley,  
 dated October 2, 1989; transmitting Revision 2  
 to the LaSalle County Station Units 1 and 2 IST Program.

Dear Dr. Murley:

Reference (a) submitted Revision 2 of Commonwealth Edison's (CECo) LaSalle County Station In-Service Testing Program. The attachment to this letter revises Relief Request RV-19 to include relief from the requirements of ASME Code Section III, Section IWV-3427(b). Such relief has been granted by the Commission in Generic Letter 89-04 (Attachment 1, Position 10). Because LaSalle's position represents a deviation from the Code requirements, it is being documented in the IST program by transmittal of this letter.

As stated in Attachment 1, Position 10 of Generic Letter 89-04, "IWV-3427(b) specifies additional requirements on increased test frequencies for valve sizes of six inches and larger and repairs or replacement over the requirements of IWV-3427(a). Based on input from many utilities and staff review of testing data at some plants, the usefulness of IWV-3427(b) does not justify the burden of complying with this requirement." As documented in the attached relief request, LaSalle's revision to Relief Request RV-19 conforms to the guidance provided in Generic Letter 89-04.

Please direct any questions you may have regarding this matter to this office.

Sincerely,

Peter L. Piet  
 Nuclear Licensing Administrator

Attachment

cc: A. Bert Davis - Regional Administrator, RIII  
 Senior Resident Inspector - LaSalle  
 B. L. Siegel - Project Manager, LaSalle  
 Office of Nuclear Facility Safety - IDNS

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VALVE RELIEF REQUEST/  
COLD SHUTDOWN JUSTIFICATION: RV-19

APPROVAL/REFERENCE DOCUMENT(s):  
SER dated 8/16/88 Position 10 of Generic  
Letter 89-04

AFFECTED COMPONENT(s):

<u>COMPONENT EPN</u>	<u>CLASS/CATEGORY</u>	<u>FUNCTION</u>
All Category A primary containment isolation valves/	Various	Containment Isolation Valve (CIV)
Pressure boundary isolation valves	Various	Pressure boundary isolation function valves (PIV)

**BASIS FOR RELIEF:** Primary containment Category A isolation valves will be seat leak tested in accordance with the requirements of Technical Specification 3/4.6.1.2 and Appendix J to 10 CFR 50. Technical Specification 3/4.6.1.2 surveillance testing for measuring valve seat leakage is consistent with the requirements of Appendix J to 10 CFR 50 with the exception of the exemption granted by the NRC for the main steam isolation valves. Operating experience with the MSIV's has indicated that degradation has occasionally occurred in the leak tightness of the valves; therefore the special requirement for testing the MSIV's was added.

Corrective action subsection IWV-3427(b) specifies additional requirements on increased test frequencies for valves of sizes 6 inches or greater and repairs or replacements over the requirements of IWV-3427(a). Generic Letter 89-04 (Attachment 1, Position 10) states "The usefulness of IWV-3427(b) does not justify the burden of complying with this requirement." This relief from IWV-3427(b) of the ASME code granted through Generic Letter 89-04 only applies to Containment Isolation valves under containment leak rate testing.

The ECCS and RCIC systems will be pressurized with water to a minimum pressure of 43.6 psig (1.10 times peak drywell accident pressure) with the system totally isolated from the primary containment (refer to note 8).

All pressure boundary isolation valves; their classification and leak-rate testing has been previously addressed in the NRC SER for LaSalle Units 1 and 2 (refer to note 5).

VALVE RELIEF REQUEST/  
COLD SHUTDOWN JUSTIFICATION: RV-19 (continued)

ALTERNATIVE  
TEST:

Perform seat leakage testing in accordance with the requirements of Appendix J to 10 CFR 50, or as amended by Technical Specifications. The seat leakage results of the primary containment isolation valves will be analyzed in accordance with Appendix J to 10 CFR 50, Technical Specification 3.6.1.2, and ASME Section XI paragraph IWV-3426. Corrective action will be taken in accordance with paragraph IWV-3427(a) and the Technical Specifications. The leakage rates for the primary containment will be limited to the following (as taken from T.S. 3.6.1.2):

- a. An overall integrated leakage rate of less than or equal to  $L_a$ , 0.635 percent by weight of the containment air per 24 hours at  $P_a$ , 39.6 psig.
- b. A combined leakage rate of less than or equal to  $0.60 L_a$  for all penetrations and all valves listed in Table 3.6.3-1, except for main steam isolation valves and valves which are hydrostatically leak tested per Table 3.6.3-1, subject to Type B and C tests when pressurized to  $P_a$ , 39.6 psig.
- c. Less than or equal to 100 scf per hour for all four main steam lines through the isolation valves when tested at 25.0 psig.
- d. A combined leakage rate of less than or equal to 1 gpm times the total number of ECCS and RCIC containment isolation valves in hydrostatically tested lines which penetrate the primary containment, when tested at 1.10  $P_a$ , 43.6 psig.

All pressure boundary isolation valves, as specified in Technical Specification Table 3.4.3.2-1, will be individually leakage rate tested in accordance with Technical Specification 4.4.3.2.2.