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October 13, 1995

**ComEd**

U.S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, D.C. 20555

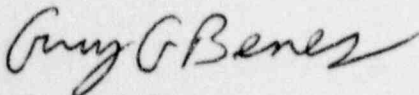
Subject: LaSalle County Station Units 1 and 2 - Revision 1 of the Second Ten Year Inspection Interval for the Inservice Testing (IST) Program  
NRC Docket Nos. 50-373 and 50-374

Reference: G. Benes letter to USNRC dated October 14, 1995

The purpose of this letter is to transmit Revision 1 of the Second Ten Year Inservice Testing Program for LaSalle County Station Units 1 and 2. Revision 0 of the Second Ten Year Inservice Testing Program was submitted by the referenced letter. Revision 1 incorporates positions stated in NUREG - 1482, "Guidelines for Inservice Testing at Nuclear Power Plants"; changes valve tables based on plant modifications; makes minor editorial changes; and adds or deletes valves and/or tests based on additional system reviews. A summary of the Revision 1 changes is included for information. In accordance with 10 CFR 55(a)(f) and 10 CFR 55(a)(g), this program has been prepared in compliance with the ASME Section XI Code, 1989 Edition. Where implementation of certain Code requirements has been determined to be impractical because of configuration of components, radiation level, or other valid reasons, specific relief requests have been included.

Please direct any questions you may have concerning this information to this office.

Sincerely,



Gary G. Benes  
Nuclear Licensing Administrator

cc: H. Miller, Regional Administrator - RIII  
P. Brochman, Senior Resident Inspector - NRC, LaSalle  
R. Latta, Project Manager, NRR  
Office of Nuclear Facility Safety - IDNS

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## **Changes to the LaSalle Station 2nd 10 year IST Program from Revision 0 to Revision 1**

**Page 2-4, Section 2.3.5:** Added paragraph discussing allowed tolerance on setting of pump fixed parameters. This position is consistent with NUREG-1482.

**Page 2-2, Section 2.2.10:** The testing procedure is not part of the Pump Tables, thus deleted this explanation. Required renumbering of subsections.

**Page 3-5, Section 3.2.15:** The testing procedure is not part of the Valve Tables, thus deleted this explanation. Required renumbering of subsections.

**Technical Position TP-02:** (1) This Technical Position has been revised to remove the Water Leg Pump discharge stop check valves from the position. These valves have been modified to manual stop valves and no longer fall under scope of the program. (2) Changed position to reflect Water Leg Pump discharge check valve exercising methodology. Since no longer have two check valves in series, the discharge check valves can be exercised and verified to open and close during quarterly pump testing as required by ASME Section XI.

**Technical Position TP-05:** This Technical Position is new to the program. It discusses the testing methodology of the DG Air Start System and Lube Oil System as discussed in NUREG-1482.

**Relief/Justification Index:** This page has been edited to accurately index the relief requests and justifications.

**Relief Request RV-01:** (1) The DG Start Air Compressor Discharge Check Valves have been removed from the scope of this relief request. Quarterly testing method has been developed to exercise valve and verify position change. (2) Added DG Cooling Water Pump Discharge check valves. These valves have a safety function in closed position but cannot be verified closed by another means than disassembly and inspection. (3) Added FP Emergency Makeup Pump Discharge check valves. These valves have a safety function in closed position but cannot be verified closed by another means. (4) Regrouped valves based on the above changes per requirements of relief request and Generic Letter 89-04.

**Relief Request RV-04:** Changed frequency of Alternative Test to match that of the HG Technical Specification (3/4.6.6.1). Per this approved Tech. Spec. change the HG hot functional test is only required to be performed once every 18 months. This is a recommendation from Generic Letter 93-05 and NUREG-1366.

**Relief Request RV-06:** Removed 3rd and 5th paragraphs. These paragraphs did not apply.

**Refuel Justification RJ-05:** This justification has been deleted from the program.

**Refuel Justification RJ-15:** This is a new justification to the program. These valves have a closed safety function but cannot be closure tested quarterly due to system configuration. Thus the closure capability will be determined via disassembly and inspection stated in RV-01.

**Refuel Justification RJ-16:** This is a new justification to the program. Due to system configuration these valves cannot be stroke timed or exercised closed during operation or cold shutdown since this would hinder Chilled Water flow to the primary containment chillers.

**Changes to Valve Tables:**

1. Added closure test to 1(2)FC044A/B, FC Pump Discharge Check Valve, and 1(2)E22-F028, ODG002, 1(2)DG002 DG Cooling Water Pump Discharge check valves per disassembly and inspection. This closure test is performed in accordance with RJ-15 and RV-01.

2. Added manual valves 1(2)FC045A/B and 1(2)FC050A/B (Fuel Pool Emergency Makeup Pump discharge stops) to program. These normally closed manual valves required to be opened in order for Fuel Pool Emergency Makeup Pump flow to enter Fuel Pool. Exercise test quarterly as required by Section XI.

3. Added RJ-16 to Valve Table for each V<sup>1</sup> valve. This refuel justification applies to 1(2)VP053A/B, 1(2)VP063A/B, 1(2)VP113A/B, and 1(2)VP114A/B.

4. Added Note 17 to RR Valve Tables for Recirc Flow Control valve HPU Inboard and Outboard Isolation valves. Note 17 is not new to Revision 1, only its documentation in the Valve Tables.

5. Added quarterly stroke time test in the closed direction for the 1(2)E12-F016A/B and 1(2)E12-F017A/B valves (Containment Spray Inboard and Outboard Isolation Valves), due to safety function in the closed direction.

6. Added valve 1(2)E12-F020 (RHR Shutdown Cooling Suction Manual Stop), 1(2)E12-F090A/B (RHR Shutdown Cooling Return Manual Stop), and 1(2)E12-F092A/B/C (RHR LPCI Injection Manual Stop) to the program. These manual valves have a safety function in the open position and have control room light indication thus a position indication test is required.

7. Removed the OM-1 testing requirements from the 1(2)E12-F055A/B relief valves since the Steam Condensing Mode of RHR is no longer used at LaSalle.a

8. Removed 2E12-F085A/B/C (RHR Water Leg Pump Discharge Stop) valves from the program. They were changed from stop check valves to strictly a passive manual stop valves with no safety function.

9. Removed closed stroke time test for the 1(2)E32-F002A/E/J/N and 1(2)E32-F003A/E/J/N. These valves do not have a safety function in the closed position.

10. Added partial stroke test at a cold shutdown frequency for the 1(2)E21-F006, LPCS Injection Inboard Check Valve.

11. Removed 2E21-F034 (LPCS Water Leg Pump Discharge Stop) valve from the program. It was changed from stop check valve to strictly a passive manual stop valve with no safety function.

12. Removed 2L22-F006 (HPCS Water Leg Pump Discharge Stop) valve from the program. It was changed from stop check valve to strictly a passive manual stop valve with no safety function.

13. Added 1(2)E22-F038, HPCS Injection Manual Stop valve to the program. This manual valve has a safety function in the open position and has control room light indication thus a position indication test is required.

14. Added 1(2)E21-F051, LPCS Injection Manual Stop valve to the program. This manual valve has a safety function in the open position and has control room light indication thus a position indication test is required.

15. Added 1(2)E22-F319, ODG009, 1(2)DG011 (DG Cooling water pump strainer backwash) valves to the program. Manual full stroke exercise test quarterly, since manual operation of valve is safety function for proper operation of the DG Cooling Water system.

16. Changed the classification of the 1E12-F020 valve from Active to Passive. Valve is locked open and has a safety function in the open direction only. Classification as Active in Rev 0 was incorrect.

17. Removed the 1(2)E12-F036A/B RHR Return to RCIC relief valve. These valves are installed on the Steam Condensing Return line to RCIC. Since the Steam Condensing Mode valves are Out of Service during conditions 1, 2, and 3, there is no situation in which these valves would be required to function.t