

#### UNITED STATES NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

October 27, 1995

- LICENSEE: Commonwealth Edison Company (ComEd)
- FACILITY: LaSalle County Station, Units 1 and 2
- SUBJECT: SUMMARY OF MEETING TO DISCUSS IMPLEMENTATION OF IMPROVED STANDARD TECHNICAL SPECIFICATIONS FOR LASALLE, UNITS 1 AND 2

On October 5, 1995, the NRC staff met with members of Commonwealth Edison Company (ComEd, the licensee) to discuss the implementation aspects of converting to Improved Standard Technical Specifications (iSTS), for LaSalle, Units 1 and 2. Enclosure 1 contains a list of the meeting participants and Enclosure 2 provides a compilation of the materials discussed during the meeting.

The licensee discussed the status of LaSalle's current Technical Specifications and their assessment of the benefits associated with conversion to ISTS. The licensee also outlined the project plan for conversion to ISTS and described their milestone schedule which establishes a submittal date of July 1996, and an implementation date of June 1997. The staff acknowledged the licensee's proposed schedule and emphasized the need for ComEd to coordinate their efforts with the BWR Owners Group and to benefit from industry's recent experiences associated with iSTS conversion. The staff also recommended that the licensee's operations organization be involved in the development and implementation phases of the conversion process in order to elicit operations insights and to foster ownership of iSTS. The licensee indicated that they were incorporating the lessons learned from recent industry experience and that their conversion process included operations participation.

The licensee described their iSTS conversion staff organization and provided insights into their review and application of the Technical Specification selection and inclusion criteria for items to be retained in the Technical Specifications and those items which will be relocated to a licensee controlled document. As indicated by the licensee, this process includes the identification of programmatic controls for each relocated requirement and the annotation of where the relocated item is to be maintained. With respect to this issue the staff stated that, in addition to these matrix type controls, it would be desirable for each review package to contain a comparison of the current Technical Specification to the iSTS. The licensee indicated that their conversion program contained provisions for the inclusion of this crosscomparison information with the submittal packages. Additional discus ions were conducted regarding the option of separately submitting individual packages to the NRC for review and comment resolution or providing a consolidated submittal. In response to this issue, the staff stated that their preference would be for a single and complete submittal which would

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#### Commonwealth Edison Company

allow for a focused review process. The staff also emphasized the need for the licensee to coordinate the implementation aspects of the conversion process with Region III personnel and the Resident Inspectors at LaSalle. The licensee acknowledged the benefits associated with a single submittal approach and the need to maintain a close liaison with the Regional Office and the residents. The licensee further stated that during the implementation phase cross references from their existing Technical Specifications to the iSTS will be maintained in order to serve as a tracking mechanism and to facilitate the development of necessary procedural changes and to ensure that prescribed surveillance requirements are satisfied. In closing, the staff recommended that the cross reference material, developed by the licensee, be made available 'n order to expedite the review process.

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At the conclusion of the meeting it was generally agreed that the interactions are beneficial and that future meetings should be scheduled on an as needed pasis in order to maintain a common understanding of the conversion process.

Original signed by

Robert M. Latta, Project Manager Project Directorate III-2 Division of Reactor Projects - III/IV Office of Nuclear Reactor Regulation

Docket Nos. 50-373, 50-374

Enclosures: 1. List of Meeting Attendees 2. Licensee's Handout

cc w encl: see next page

DISTRIBUTION: Enclosures 1 and 2 Docket File PUBLIC G21

R. Latta

B. McCabe 0-17

DISTRIBUTION: Enclosure 1 only W. Russell/F. Miraglia 0-12 G18 E. Adensam (EGA1) R. Zimmerman 0-12 G18 J. Roe (JWR) C. Grimes O-11 E22 C. Moore E. Jordan T-4 D18 ACRS T-2 E26

R. Capra B. Clayton, RIII OGC 0-15 818

#### DOCUMENT NAME: LASALLE\MTG.MIN

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LaSalle County Station Unit Nos. 1 and 2

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### NEETING TO DISCUSS IMPLEMENTATION OF IMPROVED STANDARD TECHNICAL SPECIFICATIONS MEETING ATTENDANCE LIST OCTOBER 5, 1995

#### NAME

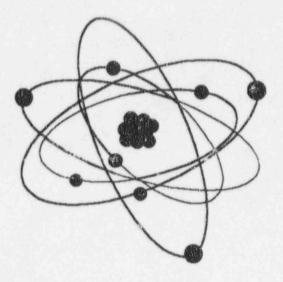
#### ORGANIZATION

R. M. Latta	NRR/PDIII-2
Lawrence F. Gerner	ComEd
Gary G. Benes	ComEd
R. A. Capra	NRR\PDIII-2
C. Grimes	NPR\DOPS\OTSB

Enclosure 1

# CONVERSION TO IMPROVED STANDARD TECHNICAL SPECIFICATIONS

# LaSalle County Nuclear Power Station



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# INTRODUCTION

LaSalle County Station

- 2 Units, BWR-5 Design
- 1130 MWE Each
- Unit 1 Licensed in 1982; Unit 2 Licensed in 1983
- ITS Conversion Project Manager --Larry Gerner
  - ♦ 24+ Years Nuclear Experience
  - Held Various Technical and Regulatory Compliance Positions at Quad-Cities, Dresden, and LaSalle Stations; and Corporate Office
  - SRO at Quad-Cities 1975-1985

# **DISCUSSION POINTS**

- Objectives and Expectations of Today's Discussion
- Characterization of Current LaSalle Tech Specs
- Decision to adopt the Improved Tech Specs at LaSalle County Station
- ITS Conversion Project Plan Overview and Current Status
  - Development Phase
  - Review Process
  - Milestone Schedule
  - Implementation Phase
- Comparison with NEI Technical Specification Task Force (TSTF) I.T.S. Document
- Summary/Conclusions

# OBJECTIVES OF TODAY'S DISCUSSION

- COMMUNICATE THE LASALLE STATION GAME PLAN FOR I.T.S. CONVERSION AND OBTAIN NRC COMMENTS
  - PROJECT PLAN
  - AMENDMENT SUBMITTAL PROCESS
  - SUBMITTAL FORMAT
  - SCHEDULE
- OBTAIN NRC FEEDBACK ON AMENDMENT SUBMITTAL PROCESS
- OBTAIN NRC COMMENTS AND
   SUGGESTIONS AS LASALLE MOVES
   FORWARD WITH THE I.T.S. CONVERSION
- REQUEST THE NAMING OF AN NRC REVIEWER FOR THE LASALLE I.T.S. AMENDMENT
- ESTABLISH FRAMEWORK FOR FUTURE DISCUSSIONS/MEETINGS
- ASK AND ANSWER QUESTIONS

# CURRENT LASALLE TECH SPECS

- Old Standard Tech Specs
- Characterization:
  - Presently contains numerous items not related directly to safe reactor operation
  - Excessive requirements with overly restrictive time clocks
  - Unclear and confusing Action Statements
  - Bases Are Not Effective
  - Need numerous interpretations & clarifications

# DECISION TO CONVERT TO I.T.S.

- LaSalle Station Recognition of Overall I.T.S. Benefits
- Preliminary Review / Study Completed in March 1995
  - Provided Confirmation of Specific Improvements and Benefits
- Benchmark Trip to Clinton Station
- NRC Notified of Intent to Convert to I.T.S. in May 17, 1995 Letter

### I.T.S. CONVERSION PROJECT PLAN SUMMARY

### DEVELOPMENT PHASE

- Start of Project (7/95) through Submittal of Tech Spec Amendment Requests to the NRC
- Development of I.T.S. Review and Approval Packages
- ComEd Review, including On-Site and Off-Site Review
- **IMPLEMENTATION PHASE** 
  - Start DURING Development Phase through Effective Date of I.T.S. Implementation

Resolve NRC Questions and Comments

- Training All Site Personnel (to varying extent)
- Procedure Changes
- Programmatic Changes Administrative Technical Requirements (ATRs) and Surveillances

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## DEVELOPMENT PHASE DOCUMENTATION

- REPORT (MATRIX) DOCUMENTING THE REVIEW AND APPLICATION OF NRC TECH SPEC SELECTION / INCLUSION CRITERIA (Split Report)
  - Items to be Retained in the Tech Specs and Applicable Selection / Inclusion Criteria for Each

 Items to be Relocated to Licensee Controlled Documents and Justification for Each

 IDENTIFICATION OF PROGRAMMATIC CONTROLS FOR EACH RELOCATED REQUIREMENT, AND ANNOTATION OF WHERE RELOCATED ITEM IS TO BE MAINTAINED

Administrative Technical Requirements (ATRs)

Programs and Procedures

GENERATION OF LASALLE STATION-SPECIFIC
 I.T.S. – LCOs, ARs, and SRs

 Consistent with NUREG and NUMARC Writer's Guide

# ADMINISTRATIVE TECHNICAL REQUIREMENTS (ATRs)

- ATRs provide a means of tracking and maintaining control of important operational requirements which are not included in, or have been removed from, the Current Tech Specs
- ATRs currently contain:
  - LCOs, Actions, and SRs for Reactor Vessel Water Level Reference Leg Continuous Backfill System
  - Tables of Units 1 and 2 Primary Containment Isolation Valves (including valve function, valve group designation (1-10), and maximum isolation time) – include automatic, manual, and excess flow check valves
  - Tables of Units 1 and 2 Primary Containment Penetration Conductor Overcurrent Protective Devices (including device number, location, and system/component powered)
  - Bases for above items
  - Fuel-cycle specific Core Operating Limits Report (COLR) for Units 1 and 2
    - MAPLHGR limits by fuel type
    - MCPR limits
    - LHGR limits
    - RBM flow-biased setpoints
- Stuff going to the ATRs will NOT be amended at the same time -any desired changes will be made per 10 CFR 50.59 later (not part of ITS Project)

### DEVELOPMENT PHASE DOCUMENTATION (CONTINUED)

- LASALLE STATION-SPECIFIC I.T.S. BASES --
  - Background, Scope, and Intent of LCOs, ARs, and SRs
- COMPARISON OF CURRENT TECH SPECS-TO PROPOSED I.T.S. AND JUSTIFICATIONS
  - Justification for Proposed Changes
  - Marked-up Current Tech Spec Pages and Discussion
  - Include Outstanding Amendment Requests That Have Been Submitted to the NRC and Expected to be Issued Prior to ITS Implementation, and should be in the ITS Submittal
  - Show Retained, Relocated, and Deleted Items
  - Indicate Administrative, More Restrictive and Less Restrictive Changes

### DEVELOPMENT PHASE DOCUMENTATION (CONTINUED)

- COMPARISON OF PROPOSED I.T.S. TO NUREG-1433 and NUREG-1434
  - NUREG-1434 Rev. 1 Will Be the Governing Document, But Will Also Reference Parts of \_ NUREG-1433 Rev. 1
  - Mark-up of NUREG

Justifications for Deviations from the NUREG

- Address Custom Plant-Specific Tech Spec and Licensing Items, Terminology, Commitments, Operating Practices, Clarifications, and Plant Design Uniqueness
- Recognize Need to Maintain Standardization of Sections 1.0 and 3.0 with NUREG
- NSHC
  - Individual NSHC for Each Change or Group of Changes
- REFERENCES

### DEVELOPMENT PHASE DOCUMENTATION (CONTINUED)

DOCUMENTATION SUBMITTED TO THE NRC:

- WILL BE ON COMPUTER DISK IN WORDPERFECT 5.1/5.2 FORMAT
- CERTIFICATION THAT SUBMITTAL IS CONSISTENT WITH PLANT-SPECIFIC DESIGN AND ANALYSES
- CERTIFICATION THAT PLANT-SPECIFIC DEVIATIONS FROM NUREG-1434 REMAIN VALID WHEN PLACED INTO THE I.T.S.
- INCLUDE DETAILS OF IMPLEMENTATION SCHEDULE
- DESCRIPTION OF ADMINISTRATIVE CONTROL PROGRAMS
- NON-I.T.S. AMENDMENT CONTROLS A CUTOFF DATE WILL BE SET AFTER WHICH NO NEW AMENDMENT REQUESTS WILL BE SENT IN (UNLESS EMERGENCY)
- I.T.S. AMENDMENT WILL INCLUDE EXTENSION OF OPERATING CYCLE FROM 18 MONTHS TO 24 MONTHS
- I.T.S. AMENDMENT WILL NOT INCLUDE THERMAL FOWER UPGRADE

### DEVELOPMENT PHASE -- PACKAGES

I.T.S. SECTIONS PACKAGED FOR REVIEW – ORDER AND/OR CONTENT MAY CHANGE

#### PACKAGE #1

- ♦ 1.0 USE AND APPLICATION
- 3.0 LCO AND SR APPLICABILITY
- ♦ 5.0 ADMINISTRATIVE CONTROLS

#### e PACKAGE #2

- ♦ 3.7 PLANT SYSTEMS
- ♦ 3.9 REFUELING
- ♦ 4.0 DESIGN FEATURES

### PACKAGE #3

- ♦ 3.4 REACTOR COOLANT
- ♦ 3.5 ECCS AND RCIC

### DEVELOPMENT PHASE -- PACKAGES (CONTINUED)

# PACKAGE #4 \$ 3.8 ELECTRICAL DISTRIBUTION

### PACKAGE #5

♦ 3.3 INSTRUMENTATION

### PACKAGE #6

3.6 CONTAINMENT

### PACKAGE #7

- 2.0 SAFETY LIMITS
- ♦ 3.1 REACTIVITY CONTROLS
- ♦ 3.2 POWER DISTRIBUTION
- ♦ 3.10 SPECIAL OPERATIONS

## I.T.S. REVIEW PROCESS Package Review

Each Review Package Contains:

- Comparison of Current Tech Specs to Proposed I.T.S. and Justifications
- LaSalle Specific I.T.S. and Bases
- Comparison of Proposed I.T.S. to NUREG-1434 and Justifications for any Deviations
- NSHC
- Resolve Identified Current Tech Spec Problem Areas
- Incorporate Applicable Current Tech Spec Interpretations
- Review and Resolve Changes to Current Tech Specs -- At NRC Now, and Pending Amendments at the Site
- Include Line-Item Improvements NRC Generic Letters and Selected BWROG Initiatives

### I.T.S. REVIEW PROCESS Package Review

### (Continued)

### REVIEWERS

- On-Site Personnel -- Operations, Site and Systems Engineering, Radiation Protection/Chemistry, Training,
   Maintenance, Regulatory Assurance, and Site Quality Verification
- Off-Site Personnel -- Licensing, Off-Site Safety Review, Nuclear Fuel Services, and Engineering - PRA
- <u>Experienced</u> and <u>Quality</u> People Involved in Review Process
- INDIVIDUAL PACKAGE TECHNICAL REVIEW
  - Review Guide / Checklist
  - NUMARC 93-03 Writer's Guide Used as Reference

 Comments to Project Manager for Resolution

### I.T.S. REVIEW PROCESS Package Review

### (Continued)

- INDIVIDUAL PACKAGE ON-SITE REVIEW AND OFF-SITE REVIEW
- DESIRE TO SUBMIT EACH APPROVED
   PACKAGE SEPARATELY TO NRC FOR REVIEW AND COMMENT RESOLUTION:
  - Lessen the FINAL REVIEW Burden by both ComEd and the NRC
  - Minimize resources needed for Final Integrated Review Step
  - NRC Comment Resolution and Acceptance --Facilitate Implementation of Training and Procedure Changes
  - Final Version of the Split Report Submitted to the NRC Along With, or Shortly After Final Package Submittal
  - NRC would issue Final Approved Complete I.T.S. and Final SER for Implementation After All Individual Packages have been Resolved

# MILESTONE SCHEDULE SUMMARY

### REVIEW PACKAGES

- Issue for ComEd Review October 1995 April 1996
- Seven Packages Done in Parallel with Staggered Start Dates
- PACKAGES SUBMITTED TO THE NRC FOR QUESTIONS/COMMENTS AND RESOLUTION
  - Start December 1995
  - We May Group Some of the Packages Together (have less than 7 submittals)
  - Complete July 1996
- GOAL IS FOR IMPLEMENTATION OF THE I.T.S. AT LASALLE IN JUNE 1997

### IMPLEMENTATION PHASE OVERVIEW

- NRC REVIEW OF AMENDMENT REQUEST DOCUMENTATION
  - MEET WITH THE NRC TO RESOLVE COMMENTS
  - REVISIONS TO AMENDMENT REQUEST MAY BE NECESSARY
  - WILL INFORM NRC WHEN ALL IS READY TO IMPLEMENT I.T.S.
- ISSUE I.T.S. FOR "TRIAL USE" PRIOR TO NRC APPROVAL -- ESTIMATE 6 MONTH DURATION
  - TRAINING
  - PROCEDURE REVISIONS
  - NO MODIFICATIONS OR HARDWARE CHANGES ARE EXPECTED
  - MAY NEED ADDITIONAL I.T.S. CHANGES SUBMIT REVISION TO ORIGINAL AMENDMENT REQUEST
- DETAILS / PLANS FOR IMPLEMENTATION PHASE TO BE FINALIZED BY JULY 1996
  - LESSONS-LEARNED FROM OTHER PLANTS
  - IMPLEMENTATION JUNE 1997

## IMPLEMENTATION PHASE TRAINING AND PROCEDURE CHANGES

TRAINING AND COMMUNICATIONS

- ALL SITE PEOPLE EXTENT AND DETAIL COMMENSURATE WITH PEOPLE'S JOBS
- TRAINING FOR OFF-SITE PERSONNEL AS DEEMED NECESSARY

EXTENSIVE OPERATOR TRAINING

- CLASSROOM FIRST SESSIONS WITH SHIFT CREWS NOV. & DEC. 1995
- SIMULATOR / ON-SHIFT IN CONTROL ROOM
- NEW VS. OLD TECH SPECS USE IN PARALLEL

PROCEDURE REVISIONS

- NEW PROCEDURES
- SURVEILLANCE TEST INTERVALS
- ADMINISTRATIVE CHANGES TO REFERENCE NEW TECH SPEC SECTIONS
- ADMINISTRATIVE TECHNICAL REQUIREMENTS ADDITIONS
- SURVEILLANCE PROGRAM AND UFSAR REVISIONS

# IMPLEMENTATION PHASE

### **CROSS REFERENCES**

- WILL SERVE AS TRACKING MECHANISMS TO ENSURE THAT THE NECESSARY PROCEDURES ARE REVISED AND DEVELOPED
- FUTURE AID TO ENSURE THAT I.T.S. SURVEILLANCE REQUIREMENTS CONTINUE TO BE SATISFIED
- REFERENCES TO BE GENERATED:
  - I.T.S. LCO NUMBER AND SURVEILLANCE REQUIREMENT NUMBER AND NEW/REVISED SURVEILLANCE TEST PROCEDURE; INCLUDING PLANT CONDITION/APPLICABILITY
  - CURRENT TECH SPEC SURVEILLANCE REQUIREMENTS AND THE I.T.S. SURVEILLANCE REQUIREMENT
  - CURRENT SURVEILLANCE TEST PROCEDURE AND NEW/REVISED SURVEILLANCE TEST PROCEDURE
  - OTHERS AS DEEMED NECESSARY AND APPROPRIATE

## COMPARISON WITH MAY 1995 NEI T.S.T.F. DOCUMENT IMPROVED TECHNICAL SPECIFICATIONS CONVERSION SUBMITTAL PROCESS

- PERFORMED DOCUMENTED
   COMPARISON REVIEW OF PROCESS AND
   ITEMS GIVEN IN NEI DOCUMENT VS.
   LASALLE I.T.S. CONVERSION PROJECT
   PLAN
- FUNDAMENTAL AGREEMENT --ENHANCEMENT CHANGES HAVE BEEN MADE TO THE LASALLE I.T.S.
   CONVERSION PROJECT PLAN
- MANY OF THE NEI ITEMS HAVE BEEN ADDRESSED IN THIS PRESENTATION
- DESIRE TO BE KEPT INFORMED, THROUGH NEI, RELATIVE TO ANY GENERIC CHANGES TO I.T.S. NUREGS OR TO THE NEI DOCUMENT

## LASALLE STATION I.T.S. CONVERSION SUMMARY AND CONCLUSIONS

#### MAINTAIN FOCUS ON PLANT SAFETY AND REALIZE BENEFITS

- FEWER CHALLENGES TO SAFETY SYSTEMS
- INCREASED CLARITY AND UNDERSTANDING
- EXPANDED BASES
- RE-EVALUATE CURRENT PRACTICES
- USE INDUSTRY AND STATION EXPERIENCE
- COST AND RESOURCE MANAGEMENT
  - REDUCTION IN TESTING
  - TECH SPEC. AMENDMENT BACKLOG REDUCTION
  - MAKE CHANGES TO RELOCATED REQUIREMENTS UNDER 10CFR50.59
- "LESSONS-LEARNED" VISITS TO OTHER SITES ARE PLANNED

GOALS

- COMPLETE I.T.S. SUBMITTALS TO NRC BY JULY 1996
- IMPLEMENT I.T.S. BY JUNE 1997
- NO LERS DUE TO I.T.S. IMPLEMENTATION
- NO TECH SPEC INTERPRETATIONS DOCUMENT
- ACCEPTANCE AND COMFORT WITH THE I.T.S.

## LASALLE STATION I.T.S. CONVERSION SUMMARY AND CONCLUSIONS (CONTINUED)

### • FURTHER DISCUSSION / ACTION ITEMS:

- PROCESS OF NRC REVIEW AND COMMENT RESOLUTION BY-PACKAGE OR GROUPS OF PACKAGES
- NRC REVIEWER
- NEI DOCUMENT COMPARISON
- ONE SET OF TECH SPECS & BASES (COMBINED UNITS 1 AND 2) VS. SEPARATE SETS FOR EACH UNIT
- ♦ 24-MONTH FUEL CYCLE INCLUSION
- NRC FEEDBACK/SUGGESTIONS/ADVICE

### ADDITIONAL QUESTIONS / ANSWERS

#### CURRENT TECH SPEC CHANGES

#### INCLUSION INTO I.T.S. vs. SEPARATE SUBMITTAL

#### Tech Spec Changes Already Submitted to NRC, or Will Be Submitted Separately from ITS Prior to ITS Implementation —

- 1. MSIV Leakage Control System Deletion
- Unit 1 SRV Upper Setpoint Tolerance Change from +1% to +3% (Unit 2 has this change already)
- 3. SRV Reduction
- 4. Diesel Generator Testing (193-05 and GL 94-01)
- 5. Response Time Testing Deletion
- 6. Main Steam High Radiation Scram and Isolation Deletion
- 7. Stuck-Open SRV Action Statement Deletion
- 8. New 10 CFR 50 Appendix J
- 9. Fuel Vendor Transition to Siemens Power Corporation
- 10. Reactor Core Instability Instrumentation Modifications
- 11. Removal of Fire Protection LCOs and SRs
- 12. Completed License Condition Deletion
- 13. Control Room HVAC Radiation Monitor Instrument Actuation Logic Change
- 14. Administrative Controls (CTS Section 6.0) Update
- 15. Main Steam Tunnel High Temperature Isolation Setpoint Increase
- Pending Tech Spec Changes to be Folded-In to the ITS Submittal
  - 16. Low Temperature Overpressure Protection and Pressure-Temperature Limit Curves; RPV Material Specimen Withdrawal Schedule
  - 17. Removal of Component Lists
  - 18. Filtration Testing Acceptance Criteria
  - 19. Refuel Interval from 18 Months to 24 Months
  - 20. Delete References to RHR Steam Condensing Mode
  - 21. Allow Periodic Cycling of Pneumatic-Operated Containment Vent and Purge Isolation Valves
  - 22. Delete Special Reactor Coolant Sampling After >15% Power Change
  - 23. Deletion of Leak-Detection Isolations Based on & Temperature
  - 24. New 10 CFR 20
  - 25. Add CRD Pump Restart Time Delay; Add a Check of CRD Charging Header Pressure as Alternate to Inserting a Control Rod with More Than One Accumulator Trouble Alarm

Split Report         2734         711/165         7/31/66           Package 1 – Sections 1.0, 3.0, 5.0         100d         9/5/65         1/22/66           Package 2 – Sections 3.7,3.9, 4.0         100d         1/0/55         2/25/66           Package 3 – Sections 3.4,3.5         1/01d         1/1/6/55         3/25/66	A REAL PROPERTY AND A REAL PROPERTY A REAL PRO
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Package 5 - Section 3.3 97d 1/5/96 5/20/96	
Package 6 - Section 3.6 95d 2/6/96 6/17/96	
Package 7 - Sections 2.0, 3.1, 3.2, 3.10 85d 3.5/86 7/1/96	
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190         2/5/00         2/2/8/00           1704         8/2/1/00         5/3/1/00         5/3/1/00           1114         5/3/1/00         6/1/3/1/00         6/1/3/1/00           1114         8/3/1/00         6/1/3/1/00         6/1/3/1/00           1114         8/3/1/00         7/3/1/00         7/3/1/00           2246         6/2/0/00         7/3/1/00         7/3/1/00           1116         11/1/2/00         7/3/1/00         7/3/1/00           1150         7/3/1/00         7/3/1/00         7/3/1/00           1150         1/3/1/00         1/1/3/00         8/1/1/3/00           1110         1/1/1/00         1/1/3/00         1/1/3/00           1110         1/1/1/00         1/1/3/00         1/1/3/00           1110         1/1/1/00         1/1/3/00         1/1/3/00           1110         1/1/1/00         1/1/1/3/00         1/1/1/3/00           1110         1/1/1/2/000         1/1/1/3/00         1/1/1/3/00           1110         1/1/1/3/00         1/1/1/3/00         1/1/1/3/00           1100         1/1/1/2/00         1/1/1/3/00         1/1/1/3/00           1100         1/1/1/2/00         1/1/1/3/00         1/1/1/3/00	*	leeus for Team Review	14	945/95	88/98	
1704         9/20105         5/31/06           111         5/31/96         6/14/96           244         6/14/96         7/31/96           244         6/14/96         7/31/96           244         6/14/96         7/31/96           244         6/206/96         7/31/96           244         6/206/96         7/31/96           111         9/195         1/12/96           1156         9/196         1/12/96           116         11/10/96         11/13/96           116         11/10/96         11/13/96           116         11/10/96         11/13/96           116         11/10/96         11/13/96           116         11/10/96         11/13/96           116         11/10/96         11/13/96           116         11/10/96         11/13/96           200         10/13/96         11/13/96           1164         11/13/96         11/13/96           1194         10/13/96         11/13/96           1194         10/13/96         11/13/96           1194         10/13/96         11/13/96           1194         10/13/96         10/12/19           1194	60	Teem Review Complete	194	Serves	3739456	
11d         5/31/96         6/14/06         6/14/06           246         6/14/06         7/31/66         7/31/66           246         6/26/06         7/31/66         7/31/66           11d         8/10/65         7/31/66         7/31/66           11d         8/10/65         7/31/66         7/31/66           11d         8/10/65         1/22/66         1/22/66           115         8/10/65         1/1/20/65         1/1/20/65           200         10/07/65         1/1/20/65         1/1/20/65           116         1/1/20/65         1/1/20/65         1/1/20/65           200         10/07/65         1/1/20/65         1/1/20/65           116         1/1/20/65         1/1/20/65         1/1/20/65           200         10/07/65         1/1/20/65         1/1/20/65           116         1/1/20/65         1/1/20/65         1/1/20/65           116         1/1/20/65         1/1/20/65         1/1/20/65           116         1/1/20/65         1/1/20/65         1/1/20/65           116         1/1/20/65         1/1/20/65         1/1/20/65           116         1/1/20/65         1/1/20/65         1/1/20/65           116 <td>•</td> <td>Continuoually Update Report</td> <td>1784</td> <td>87,29456</td> <td>5/31/26</td> <td></td>	•	Continuoually Update Report	1784	87,29456	5/31/26	
11d         014000         0250000           244         020505         7/31/00           244         020505         7/31/00           113         0         7/31/00           114         0         7/31/00           115         0         1/32/00           115         0         0           115         0         0           115         0         0           115         0         0           115         0         0           115         0         0           115         0         1           200         1         1           200         1         0           116         1         1           1160         1         1           200         1         0           200         1         0           200         1         1           200         1         1           200         1         1           200         1         1           200         1         1           200         1         1           200	4	Orreite Review	110	8/31/86	81,408	
244         6/28/96         7/31/86           0d         7/31/80         7/31/86           1         3/11/86         7/31/86           1         3/11/86         7/31/86           1         3/11/86         7/31/86           1         3/11/86         1/22/86           1         3/11/86         1/12/196           1         1/16/86         1/12/196           1         1/16/96         1/12/196           1         1/12/196         1/12/196           1         1/12/196         1/12/196           1         1/12/196         1/12/196           1         1/11/2066         1/12/196           1         1/12/196         1/12/196           1         1/166         1/12/196           1         1/166         1/12/196           1         1/166         1/12/196           1         1/12/196         1/12/196           1         1/166         1/12/196           1         1/12/196         1/12/196           1         1/12/196         1/12/196           1         1/12/196         1/12/196           1         1/16/16         1/12/16		Offisite Revisee	P11	6/14/96	8728788	
0d         7/31/86         7/31/86           946         8/4/95         1/22/86           946         8/4/95         9/26/66           156         0/5/66         9/26/66           156         0/16/66         1/06/66           206         10/6/66         1/1/26/66           206         1/1/1/6/65         1/1/26/66           111         1/1/1/26/65         1/1/26/65           111         1/1/1/26/65         1/1/26/65           111         1/1/1/26/65         1/1/26/65           111         1/1/1/26/65         1/1/26/65           111         1/1/1/26/65         1/1/26/65           204         1/1/1/26/65         1/1/26/65           204         1/1/1/26/65         1/1/26/65           111         1/1/1/26/65         1/1/26/65           204         1/1/26/65         1/1/26/65           111         1/1/26/65         1/1/26/65           111         1/1/26/65         1/1/26/65           111         1/1/26/65         1/1/26/65           111         1/1/26/65         1/1/26/65           111         1/1/26/65         1/1/26/65           1111         1/1/26/65         1/1/26/65	a	Charges incorporated	246	6726795	7/31/86	
Red         SAME         172/16           150         005005         0020005           151         005005         0020005           200         100005         100005           200         100005         11/2005           200         101/3055         11/2005           110         11/2005         12/13055           110         11/2005         12/13055           110         11/2005         12/13055           100         12/13055         11/12005           204         12/13055         11/12005           204         12/13055         11/12005           100         12/13055         11/12005           100         12/13055         11/12005           100         12/13055         11/12005           100         1/12005         1/12005           100         1/12005         1/12005           100         1/12005         1/12005           100         1/12005         1/12005           100         1/12005         1/12005           100         1/12005         1/12005           100         1/12005         1/12005           100         1/12005	38	Submit to NRC	8	7/31/86	7/31/66	•
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154         0:18/05         1:0/0/05         1:0/0/05           204         1:0/0/05         1:1/20/05         1:1/20/05           114         1:1/20/05         1:1/20/05         1:1/20/05           194         1:1/20/05         1:1/20/05         1:1/20/05           244         1:2/13/05         1:1/20/05         1:2/13/05           194         1:2/13/05         1:1/20/05         1:1/20/05           194         1:2/13/05         1:1/20/05         1:1/20/05           194         1:2/13/05         1:1/20/05         1:1/20/05           194         1:2/13/05         1:1/20/05         1:1/20/05           194         1:2/13/05         1:1/20/05         1:1/20/05           194         1:2/13/05         1:1/20/05         1:1/20/05           194         1:0/3/05         1:0/21/05         1:0/21/05           1184         Tesk         Program         Summary           None         Summary         Summary         Summary	12	Draft Corry/Jette	1961	992436	99/92/6	
2d         1005050         1005050         1005050           200         107.105         11/20050         11/20050           110         11/20050         12/13/050         12/13/050           244         12/13/050         12/13/050         12/13/050           244         12/13/050         11/22/050         11/22/050           1594         12/13/050         11/22/050         11/22/050           1594         12/13/050         11/22/050         11/22/050           1594         12/13/050         11/22/050         11/22/050           1594         12/13/050         11/22/050         11/22/050           1594         12/13/050         11/22/050         11/22/050           1594         12/13/050         11/22/050         11/22/050           1594         12/05/050         10/27/050         10/27/050           1594         10/27/050         10/27/050         10/27/050           1594         10/27/050         10/27/050         10/27/050           1594         10/27/050         10/27/050         10/27/050           1594         10/27/050         10/27/050         10/27/050           1594         10/27/050         10/27/050         10/27/050 <td>13</td> <td>Draft Typed</td> <td>156</td> <td>8/18/95</td> <td>108/86</td> <td></td>	13	Draft Typed	156	8/18/95	108/86	
204         106:55         11/2005           116         11/2005         12/1305           116         11/2005         12/1305           24d         12/1305         1/1/2005           24d         12/1305         1/1/2005           24d         12/1305         1/1/2005           104         12/1305         1/1/2005           104         12/1305         1/1/2005           104         12/1305         1/1/2005           104         12/1305         1/1/2005           104         12/1305         1/1/2005           104         12/1305         1/1/2005           1104         12/1/1/105         1/1/2005           1104         10/2/1/105         1/1/2/105           1104         1/1/2/105         1/1/2/105           1104         1/1/2/105         1/1/2/105           1104         1/1/2/105         1/1/2/105           1104         1/1/2/105         1/1/2/105           1104         1/1/2/105         1/1/2/105           1104         1/1/2/105         1/1/2/105           1104         1/1/2/105         1/1/2/105           1104         1/1/2/105         1/1/2/105      <	14	leave for Team Review	8	10/6/05	10/9/55	
11         11,0005         11,72065           186         11,22065         12/1365           244         12/1365         1/15666           24         12/1365         1/15666           24         12/1365         1/15666           24         12/1365         1/15666           19         1/20165         1/12066           194         10/2016         1/12066           194         10/2016         1/12066           194         10/2016         1/0/2016           194         10/2016         1/0/2016           194         10/2016         1/0/2016           194         10/2016         1/0/2016           194         10/2016         1/0/2016           194         10/2016         1/0/2016           194         10/2016         1/0/2016           104         1/0/2016         1/0/2016           104         1/0/2016         1/0/2016           104         1/0/2016         1/0/2016           104         1/0/2016         1/0/2016           104         1/0/2016         1/0/2016           104         1/0/2016         1/0/2016           104         1/0/20	38	Tetern Review Complete	204	106/36	11/3/86	
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24d         12/13/06         1/15/06           0-         1/2/13/06         1/12/06           1444         142/13/06         1/12/06           1444         142/13/06         1/02/13/06           1941         1/03/06         1/02/13/6           1941         1/03/06         1/02/13/6           Indemneri Phase         Teck         1/02/13/6           Administry         Teck         1/02/13/6           Summery         Page I         1/02/13/6	15	Offeite Review	184	11/20/85	12/13/85	
Or         1/22/66         1/22/66           1941         192/66         1/22/66           1941         10/27/86         2/76/76           1941         10/27/86         10/27/86           1941         10/27/86         10/27/86           1941         Teck         E           Nonenti Phase         Progres           Summery         Summery	18	Changes incorporated	244	12/13/86	1/15/96	
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9	Taski Name	Desetion	Start	Finiteh	JASIO	N D		ALLI
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*	Ornathe Revisers	11d	12/4/96	12/18/95				
*	Offeite Revises	200	12/18/85	1/22/96				
63	Cherges incorparated	246	1/17/58	2/19/96				
-	Submit to NRC	8	2/26496	2/26/96			•	
-	Package 3 - Sections 3.4, 3.6	199995	9474715	3725/96			ľ	
8	Draft Comptete	1961	11/8/85	11/30/85		Ø		
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32	Inserted for Teatrn Ronkern	8	12/8/85	12/11/95		50000		
2	Team Review Complete	209	12/11/66	1/5/96				
8	Onsite Review	164	156951	1/26/96				
38	Offisitia Reviser	176	1/26/96	2/19/96				
*	Charges incorporated	246	2/14/96	3/18/26				
45	Submit to NRC	8	372496	375596			٠	
38	Package 4 - · Section 3.8	Page	12/8/86	8122/8		2	P	
2	Draft Cumplete	<u>\$</u>	125,36	12/29/95				
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46 Chen	Changes incorporated	246	3/13/96	4115/266			
46 Subr	Submit to NRC	8	4/2/96	864CZ/#		•	
47 Package	Package 6 - Section 3.3	P996	18/98	842498			P
48 Dreft	Drsft Complete	194	1/5/96	1/31/88			
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64 Chen	Changes incorporated	246	4/10/96	5413496			
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67 Draft	Draft Complete	184	2/6/96	SMAR			
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Submit to NRC         00         617/660         617/660           Percleages 7 - Sectiones 2.4, 1.4, 3.2, 1.6         846         71/166         817           Percleages 7 - Sectiones 2.4, 1.4, 3.2, 1.6         846         71/166         71/166           Drinh Comrelete         156         3/15/06         4/5/06         3/20/06           Drinh Typed         156         3/15/06         4/5/06         3/20/06           Drinh Tommelen         156         3/15/06         4/5/06         3/20/06           Ineuse for Teem Review         2/0         4/05/06         5/20/06         5/20/06           Teem Review         116         5/0/06         5/20/06         5/20/06           Ornaba Review         116         5/0/06         5/20/06         5/20/06           Ornaba Review         116         5/17/06         0/10/06         1/166           Changere Incorporated         2/0         4/066         1/166         1/166           Submit to NIKC         2/0         1/166         1/166         1/166           Propore Final Integrated Submitted         2/0         1/166         1/166         1/166           Send In Final Submitted         2/0         1/166         1/166         1/166         1/16	Submit to MRC         02         0-17364         0-17364           Pockagey 1 - Sectiones 24, 3.1, 3.2, 3.1 is         946         34664         1464           Darki Commelas         158         34666         1566         32066           Darki Toped         158         34668         45566         32066           Darki Toped         158         34668         45566         45566           Team Review         230         45566         55566         55566           Team Review         110         56066         55066         55066           Omba Review         110         56076         55066         55066           Changes Incorporated         241         71766         71766           Schurk Ib NRC         241         71766         71766           Freques Frait Schurkla         241         71766         71766           Schurk Ib NRC         241         71766         71766           Schurk Ib NRC         224         71766         71766           Freeser Frait Schurkla         26         71766         71766           Schurk Ib Netter         24         71766         71766           Frait Review Frait Schurkla         26         71766	2 2		These sectors	Start	Parameter -	x	O N O	L M A M J	V I N I
Practicages 7 – Sectiones 2.6, 1.4, 3.2, 2.16         Bold         366.96         71/965           Dreft Convelete         1.9         355.96         352.96           Dreft Convelete         1.9         355.96         352.96           Dreft Typed         1.5         316.896         455.96           Dreft Typed         1.5         316.896         455.96           Ierue for Teem Review         2.0         455.96         50.96           Teem Review         2.01         45.96         50.96           Ornaits Review         1.10         56.96         50.96           Charlas Review         1.11         57.1766         67.1066           Offable Review         1.11         57.1766         67.1066           Charges Incomponted         2.46         57.3666         57.3666           Submit to NRC         2.00         7.1766         7.1766           Submit to NRC         2.04         7.1766         7.1766           Fhaat Integrated Submittad to inffic         2.04         7.1766         7.1766           Submit to NRC         2.04         7.1766         7.1766           Fhaat Integrated Submittad to inffic         2.04         7.1766         7.1766           Send In Fhaa	Perchage 1 - Sections 2A, 1, 3A, 1, 6         Sed         Anne         11/16           Dunf Connyells         180         3/16/06         3/26/06         3/26/06           Dunf Connyells         180         3/16/06         3/26/06         3/26/06           Dunf Tommen         20         4/5/06         3/26/06         4/5/06           Insue for Team Review         20         4/5/06         3/26/06         4/5/06           Team Review         204         4/6         5/26/06         5/26/06           Consh Review         216         5/60/06         5/20/06         5/20/06           Consh Review         116         5/60/06         5/20/06         5/20/06           Consh Review         116         5/60/06         5/20/06         5/20/06           Consh Review         116         5/17/06         7/1/06         7/1/06           Solunt to NRC         204         7/1/06         7/1/06         7/1/06           Pregee Freed Submittal to NRC         204         7/1/06         7/1/06         7/1/06           Solunt to NRC         204         7/1/06         7/1/06         7/1/06         7/1/06           Sevel In Freed Submittal         0         7/1/06         7/1/06         7		t	8	8417/96	6/17/96				
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#### NUCLEAR ENERGY INSTITUTE (NEI) DOCUMENT

#### IMPROVED TECHNICAL SPECIFICATIONS (ITS) CONVERSION SUBMITTAL PROCESS MAY 1995

#### COMPARISON TO LASALLE STATION ITS CONVERSION PROJECT PLAN

NEI DOCUMENT SECTION NO. AND TITLE	NEI DOCUMENT ITEM DESCRIPTION	NEI DOCUMENT ITEM RESOLUTION IN LASALLE ITS CONVERSION PROJECT PLAN (Ref. and Discussion)
2.0 APPLICATION OF SELECTION CRITERIA	Apply NRC Tech Spec Selection Criteria to the Current Tech Specs (CTS).	Section 2 Pages 2,3, & 8; Appendix 4 Steps 3.4, 4.1, and 4.2. Covered through the development of the Split Report; the NRC Criteria were used when reviewing the CTS.
	Determine which items may be relocated from CTS to plant controlled documents and those items retained in the LaSalle ITS.	Section 2 Page 8. Covered through the development of the Split Report.

2.1 DOCUMENTATION OF CRITERIA	Develop matrix that identifies for each CTS which criteria are applicable and the new location of the CTS in the LaSalle ITS.	Section 2 Page 8. Covered through the development of the Split Report.
	For the specifications that are in the ITS, those that are applicable to LaSalle should be identified and placed into the LaSalle ITS.	Section 2 Page 8. Covered through the development of the Split Report.
	For each CTS to be relocated to plant controlled documents, a lustification for the relocation must be provided.	Section 2 Page 8. Covered through the development of the Split Report.
	Justification should address each of the 4 NRC Criteria using the plant-specific safety analysis and PSA/IPE results.	Section 2 Page 8. Covered through the development of the Split Report; Relocated items will ba addressed as to how none of the 4 NRC Criteria apply.
	Also include an annotation of where the relocated items will be maintained (i.e. ATRs, UFSAR, procedure) and the corresponding controls (i.e. 50.59).	Section 2 Page 8. Covered through the development of the Split Report.

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NEI DOCUMENT SECTION NO. AND TITLE	NEI DOCUMENT ITEM DESCRIPTION	NEI DOCUMENT ITEM RESOLUTION IN LASALLE ITS CONVERSION PROJECT PLAN (Ref. and Discussion)
3.0 PLANT-SPECIFIC ITS	Typed LaSalle ITS provided in the submittal and may also be in electronic media.	Section 2 Pages 8, 9, & 18. Hard copy and electronic copy versions of the LaSalle ITS documentation will be maintained; WordPerfect format is specified.
	LaSalle ITS based on the currently published version of the applicable NUREG, as modified to reflect plant-specific design, analyses, licensing bases, and approved generic changes applicable to LaSalta.	Section 2 Pages 8 & 9. LaSalle-unique features will be applied to NUREG-1434 Rev. 1 and parts of NUREG- 1433 Rev. 1.
	Format of the LaSalie ITS is consistent with the applicable NUREG and the Writer's Guide for Restructured STS.	Section 2 Page 9. NUREG-1434 Rev. 1 and NUMARC Writer's Guide are referenced.
	Submittal should include a list of all major proposed changes that are separate from the ITS or contained in the CTS.	Section 2 Page 9. This has been added to the Project Plan.

4.0 CTS CCMPARISON DOCUMENT	LaSalle CTS should be compared to the proposed LaSalle ITS and marked to indicate the necessary changes; markup includes discussion of changes for each change, and markup is annotated to reference the specific discussion of the changes.	Section 2 Page 9; Appendix 4 Steps 4.3 & 4.4. Each review/conversion package will contain a mark-up of the CTS and a discussion of the changes for each CTS mark-up.
	Markup of CTS also includes any outstanding amendment requests (and associated cutoff date) that have been submitted to the NRC that are expected to be issued prior to ITS implementation, and should be included in the ITS submittal.	Section 2 Page 9. This was added to the Project Plan. The CTS Comparison Document will cover this.
	Technical changes from the CTS to the LaSalle ITS should be clear as to exactly what the changes are and whether the changes are consistent or not with the ITS.	Section 2 Page 9. This was added to the Project Plan. The CTS Comparison Document will cover this.

4.1 Administrative, More Restrictive, Relocated, Less Restrictive definitions are specified and applied.	Section 2 Page 10. Definitions are provided.
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NEI DOCUMENT SECTION NO. AND TITLE	NEI DOCUMENT ITEM DESCRIPTION	NEI DOCUMENT ITEM RESOLUTION IN LASALLE ITS CONVERSION PROJECT PLAN (Ref. and Discussion)
5.0 NO SIGNIFICANT HAZARDS CONSIDERATION (NSHC)	For each change or group of changes identified in the CTS Comparison Document, an individual NSHC analysis is provided.	Section 2 Page 11; Appendix 4 Steps 3.3 & 4.11. NSHC discussion in the Project Plan covers this. Each review/conversion package will contain a NSHC.
	NSHC is annotated with the same annotation used in the discussion of changes.	Section 2 Page 12. Added to NSHC discussion in the Project Plan.

6.0 DEVIATIONS FROM THE ITS NUREG	All deviations from the applicable NUREG should be annotated to facilitate NRC review; this includes marking up the NUREG to reflect all changes, including approved generic changes.	Section 2 Pages 10 & 11; Appendix 4 Steps 4.13 & 4.18. There will be plant-specific design or unique operating considerations that will cause the NUREGs to be slightly modified. In doing so, each change to the ITS (deviation) will be discussed with the review/conversion packages.
	Justification of each deviation or group of common deviations should be provided; these discussions of changes may be annotated to reference the applicable change in the markup of the CTS.	Section 2 Pages 10 & 11. NUREG comparison document will cover this.
	Identify and resolve any items for which conformance to the ITS would constitute an unwarranted backfit to existing license requirements.	Section 2 Pages 10 & 11. These items will be identified, and then resolved in the submittal process.

6.1 DISCUSSION OF CHANGES FOR THE DEVIATION	Group as Plant Specific, Bracketed Changes, and Generic Changes.	Section 2 Page 11. NUREG comparison document will cover this.
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6.2 CUSTOMIZATION	Address customization Items such as unique licensing or design basis changes, unique operating practices, terminology, current licensing basis (with technical justification for retaining such requirements), commitments, and clarifications.	Section 2 Page 11. NUREG comparison document will cover this.
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NEI DOCUMENT SECTION NO. AND ITTLE	NEI DOCUMENT ITEM DESCRIPTION	NEI DOCUMENT ITEM RESOLUTION IN LASALLE ITS CONVERSION PROJECT PLAN (Ref. and Discussion)
6.3 ITS BASES	Include plant-specific items.	Section 2 Page 9. The Bases will be written to address plant- unique design and operating characteristics. Existing analyses, reports, and regulatory documents will be referenced.
7.0 FINAL SER	Determine when to issue the SER, based on when all technical and legal issues are resolved.	Section 2 Page 16. Timing of the SER is addressed in the Project Plan. Details to be covered in the Implementation Phase Plan.
8.0 IMPLEMENTATION	Identify when the ITS and all new programs and procedures are to be effective; inform the NRC that all required programs, procedures, and training are completed and we are ready to implement the ITS.	Section 2 Page 18. This has been added to the Project Plan. Details to be covered in the Implementation Phase Plan.
9.0 POST IMPLEMENTATION AUDIT	Audit by the NRC to assess the effectiveness of the ITS implementation, and to determine if the relocated items have appropriate controls.	This item is not covered in the Project Plan. Preparation for this audit/inspection by the NRC may be covered in the Implementation Phase Plan.
10.1 THROUGH 10.8 UTILITY RESPONSIBILITIES	10.1 – Provide the NRC with computer files of all typed ITS conversion submittal information in WordPerfect 5.1 format.	Section 2 Page 18. Both hard copy and computer disk files will b provided of ITS conversion documentation. WordPerfect 5.1/5.2 format will be utilized.
	10.2 - Certify that the submittal is consistent with plant-specific design, analyses, and licensing bases.	Section 2 Page 15. This will be provided upon submittal of the ITS conversion documentation to the NRC.
	10.3 - For all plant-specific deviations based on current licensing bases, cer 'fy that the deviation and associated SER statements, if any, such unting the current requirements remain valid when incorporated into the ITS. Ensure the intent of the ITS is maintained with the incorporated deviation.	Section 2 Page 15. This will be provided upon submittal of the ITS conversion documentation to the NRC.

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NEI DOCUMENT SECTION NO. AND TITLE	NEI DOCUMENT ITEM DESCRIPTION	NEI DOCUMENT ITEM RESOLUTION IN LASALLE ITS CONVERSION PROJECT PLAN (Ref. and Discussion)
	10.4 – Limit all other amendment requests during the NRC review process. Develop with the NRC an agreed-upon cutoff date after which no new amendment requests will be generated, unless needed to allow continued plant operations or other emergency.	Section 2 Page 19. This will be a coordinated effort between the NRC staff (ITS reviewer and LaSalle PM), the Corporate Licensing organization, and the LaSalle Regulatory Assurance people.
	10.5 – Develop a firm schedule for ITS implementation identifying when a draft and final SER is required from the NRC to support implementation.	Section 2 Page 15. This will be provided upon submittal of the ITS conversion documentation to the NRC. More detailed information will be covered by the Implementation Phase Plan.
	<ul> <li>10.6 - Develop or change programs/procedures that address the new programs discussed in Chapter 5 of the ITS - examples are the:</li> <li>SFDP.</li> <li>Bases Control Program.</li> <li>Ventilation Filter Test Program.</li> <li>Diesel Fuel Oil Testing Program.</li> <li>Explosive Gas and Storage Tank Radioactivity Monitoring Program.</li> </ul>	Section 2 Page 17. These are covered in the Project Plan; more details will be addressed in the Implementation Phase Plan.
	<ul> <li>10.7 &amp; 10.8 - Review procedures and determine those that require revision. Experience shows that:</li> <li>75% are reference changes only.</li> <li>15% are minor, or can be lived with (i.e. more conservative).</li> <li>10% are technical (i.e. new procedures or add more detail).</li> </ul>	Section 2 Page 17. These are covered in the Project Plan; more details will be addressed in the Implementation Phase Plan.
11.0	Provide training to on-site and off-site personnel. Include:	Section 2 Page 16.

11.0	Provide training to on-site and off-site personnel. Include:	Section 2 Page 16.
TRAINING	RO/SRO Initial Training.	These are covered in the Project Plan; more
1	<ul> <li>RO/SRO Regualification Training.</li> </ul>	datalls will be addressed in the
	<ul> <li>Non-Licensed Operator Training.</li> </ul>	Implementation Phase Plan.
	<ul> <li>Engineering Support Training.</li> </ul>	
	<ul> <li>Station Management.</li> </ul>	
	<ul> <li>Licensing and Regulatory Assurance Personnel.</li> </ul>	
	Selected Maintenance Personnel.	and the second second second second second

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