



Commonwealth Edison

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

September 19, 1984

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

Subject: LaSalle County Station Units 1 and 2
Proposed Amendment to Technical
Specification for Facility Operating
License NPF-11 and NPF-18 Concerning
Reactor Water Cleanup Pump Room High
Ambient and High Differential
Temperature Isolation
NRC Docket Nos. 50-373 and 50-374

- References (1): P&IDs M-93 sheets 1 and 2, M-97 sheet 1
(Unit 1) and M-139 sheets 1 and 2, M-143
sheet 1 (Unit 2).
- (2): UFSAR Table 7.3.2
- (3): Technical Specification Tables 3.3.2-1,
3.3.2-2, 3.3.2-3, and 4.3.2.1-1.
- (4): UFSAR Table 5.2.8
- (5): GE Design Specification 22A2870.
- (6): UFSAR Section 7.6.1.2.6.

Dear Mr. Denton:

Pursuant to 10 CFR 50.59, Commonwealth Edison proposes to amend Appendix A, Technical Specification, to Facility Operating Licenses NPF-11 and NPF-18. These amendment changes are being submitted for your staff's review and approval.

The proposed change is enclosed in Attachment 2. The attached change has received both On-Site and Off-Site review and approval. We have reviewed this amendment request and find that no significant hazards consideration exists. Our review is documented in Attachment 3. Commonwealth Edison is notifying the State of Illinois of our request for this amendment by transmitting a copy of this letter and its attachments to the designated State Official.

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H. R. Denton

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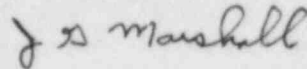
September 19, 1984

In accordance with 10 CFR 170, a fee remittance of \$150.00 is enclosed.

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

Three (3) signed originals and thirty-seven (37) copies of this transmittal and its attachments are provided for your use.

Very truly yours,



J. G. Marshall
Nuclear Licensing Administrator

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Attachments (1): Background and Discussion
(2): Technical Specification Change to NPF-11 and NPF-18
(3): Evaluation of Significant Hazards Consideration

cc: Region III Inspector - LaSalle
A. Bournia - NRR
G. Wright - Ill.

SUBSCRIBED and SWORN to
before me this 19th day
of September, 1984

Rosalie A. Penta
Notary Public

ATTACHMENT 1

LASALLE COUNTY STATION UNITS 1 AND 2

TECHNICAL SPECIFICATION CHANGE REQUEST

BACKGROUND: The Reactor Water Cleanup System (RWCU) is normally in operation to maintain reactor water chemistry within required limits and is connected to the Reactor Coolant Pressure Boundary. The system outboard of the primary containment isolation valves is not however part of the reactor coolant pressure boundary. The system inlet side comes from the reactor vessel and/or the reactor recirculation pump suction lines through the primary containment. The system returns to the feedwater line outside primary containment (See reference 1). The original design of the RWCU system was such that the RWCU system recirculation pumps contained reactor water at full operating temperature and pressure. This water was cooled downstream with heat exchangers to below 130°F prior to entering the demineralizers. To allow for better pump operation based on operating experience at other plants, the system design was changed to move the RWCU pumps to a point in the system after the heat exchangers to allow the pumps to contain lower temperature water. Based on the original RWCU System design, the pump room leak detection system was designed for hot reactor water which included the following: (1) system high differential flow, (2) RWCU pump rooms (3 rooms) high ambient and high differential temperature, and (3) reactor building sump high level. Items (1) and (2) above provide automatic isolation signals to the RWCU System and item (3) provides remote alarm provisions to the control room to allow the operator to manually isolate the RWCU system. These methods are summarized in reference (4). After the RWCU system configuration change, the RWCU pumps contained low temperature water and the ambient and differential temperature monitors were no longer required (references 4 and 5). However the automatic isolation provisions based on temperature were not removed from the design and are installed in the plant and included in the Technical Specifications (reference 3). The cold portion of the RWCU system has differential flow as well as reactor low water level (level 2) automatic isolations. The system can also be isolated manually if area sump levels or other methods indicate leakage in the system (reference 6).

DISCUSSION: Since the ambient and differential temperature sensors are ineffective for detecting leakage of the cold water in the RWCU pump room portion of the piping system, they should be removed from reference (3). At the present time the setpoints for these instruments are set to detect the equivalent leakage limit and are very near the normal operating conditions due to the lower temperature. This has caused unnecessary spurious isolations and several LERs when no leaks were present. Sufficient diversity remains to ensure that actual leakage in the RWCU pump rooms is monitored and will be promptly isolated.

Revisions to the UFSAR will be included in the next update.

Marked up Technical Specification pages which reflect this change are included in Attachment A.

ATTACHMENT 3

SIGNIFICANT HAZARDS CONSIDERATION

Commonwealth Edison has evaluated the proposed Technical Specification Amendment and determined that it does not represent a significant hazards consideration. Based on the criteria for defining a significant hazards consideration established in 10CFR50.92, operation of LaSalle County Station Units 1 and 2 in accordance with the proposed amendment will not:

- 1) Involve a significant increase in the probability or consequences of an accident previously evaluated because the Reactor Water Cleanup (RWCU) System will still have adequate isolation capability and meets the requirements for cold system piping as specified in the FSAR for this system. This change updates the Technical Specifications to reflect the actual design of the RWCU system in that the RWCU recirculation pumps are presently located in a cold portion of the system.
- 2) Create the possibility of a new or different kind of accident from any accident previously evaluated because leakage from the RWCU System has already been evaluated.
- 3) Involve a significant reduction in the margin of safety because the reactor water cleanup system will still be monitored for leakage and will still isolate if the leakage exceeds the required limits. This change deletes only the temperature monitoring of the colder portions of the RWCU System where this type of monitoring is not very effective and causes unnecessary isolations.

Based on the preceding discussion, it is concluded that the proposed system change clearly falls within all acceptable criteria with respect to the system or component, the consequences of previously evaluated accidents will not be increased and the margin of safety will not be decreased. Therefore, based on the guidance provided in the Federal Register and the criteria established in 10CFR50.92(e), the proposed change does not constitute a significant hazards consideration.