

February 6, 1984

Note to: Tony Bournia

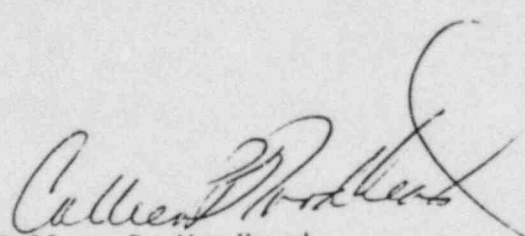
From: Colleen P. Woodhead

SUBJECT: NSH FINDING IN TECH SPEC REVISION FOR LASALLE, UNIT 1

I am not concurring in the proposed NSH notice of proposed revision to the LaSalle Unit 1 tech specs because Con. Ed. has not provided sufficient support for the finding. Essentially they state that because Units 1 and 2 are almost identical, and share a control room, the tech specs should be the same. They then propose to revise TS for Unit 1 to be consistent with Unit 2 TS because NRC approved those for Unit 2. Then a declaration by fiat is made that the three factors to be considered in a NSH finding are not in question.

However, it is not at all clear to me that all proposed TS changes for Unit 1 are for systems, design, and components identical to Unit 2 nor is it obvious why it is reasonable and without safety significance to make some significant changes proposed, e.g., one hour to 12 hours in an action statement in T.S. 4.1.1.c.; and other numerical changes. There are 56 changes that even the Applicant describes as "major changes." (Fifteen additional changes are described as minor administrative changes.) There must be more explanation of why apparently significant differences between the TS exist and why each of the "major" changes to conform to Unit 2 TS do not involve significant hazards considerations.

In short, for the "major" changes, each change must be fairly described in the notice and for each (or each category of major changes), there must be a basis given for why the changes involve NSHC. (The fact that the changes are being made to conform to the Unit 2 license does not make the changes purely administrative in nature.) The 15 "minor changes," which indeed may be to correct typographical errors and make nomenclature consistent, may be characterized as administrative changes corresponding to the Commission's NSHC example if they are nonsubstantive changes.


Colleen P. Woodhead

8502090269 840518
PDR FOIA
ADAT084-166 PDR

I agree
gky 2/6/84

273