

PLANT SYSTEMS

3/4.7.2 CONTROL ROOM AND AUXILIARY ELECTRIC EQUIPMENT ROOM EMERGENCY  
FILTRATION SYSTEM

LIMITING CONDITION FOR OPERATION

3.7.2 Two independent control room and auxiliary electric equipment room emergency filtration system trains shall be OPERABLE.<sup>#</sup>

APPLICABILITY: All OPERATIONAL CONDITIONS and \*.

ACTION:

- a. With one emergency filtration system train inoperable, restore the inoperable train to OPERABLE status within 7 days<sup>\*\*</sup> or:
  1. In OPERATIONAL CONDITIONS 1, 2, 3, be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.
  2. In OPERATIONAL CONDITION 4, 5 or \*, initiate and maintain operation of the OPERABLE emergency filtration system in the pressurization mode of operation.
- b. With both emergency filtration system trains inoperable, in OPERATIONAL CONDITION 4, 5 or \*, suspend CORE ALTERATIONS, handling of irradiated fuel in the secondary containment and operations with a potential for draining the reactor vessel.
- c. The provisions of Specification 3.0.3 are not applicable in Operational Condition \*.

SURVEILLANCE REQUIREMENTS

4.7.2 Each control room and auxiliary electric equipment room emergency filtration system train shall be demonstrated OPERABLE:

- a. At least once per 31 days on a STAGGERED TEST BASIS by initiating, from the control room, flow through the HEPA filters and charcoal adsorbers and verifying that the train operates for at least 10 hours with the heaters OPERABLE.

\*When irradiated fuel is being handled in the secondary containment.

#The normal or emergency power source may be inoperable in OPERATIONAL CONDITION 4, 5 or \*.

\*\* INERT A

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ATTACHMENT B  
PROPOSED AMENDMENTS TO THE  
LICENSE/TECHNICAL SPECIFICATIONS

INSERT A

\*\* During fuel cycle 8, a one-time allowed outage time extension to 30 days is granted for each train, one at a time, to allow for modification of the charcoal adsorber section of each train.

## PLANT SYSTEMS

### SURVEILLANCE REQUIREMENTS (Continued)

- b. At least once per <sup>24</sup>18 months<sup>\*\*</sup> or (1) after any structural maintenance on the HEPA filter or charcoal adsorber housings, or (2) following painting, fire or chemical release in any ventilation zone communicating with the train by:
1. Verifying that the train satisfies the in-place testing acceptance criteria and uses the test procedures of Regulatory Positions C.5.a, C.5.c and C.5.d of Regulatory Guide 1.52, Revision 2, March 1978, and the train flow rate is 4000 cfm  $\pm$  10%.
  2. Verifying within 31 days after removal that a laboratory analysis of a representative carbon sample obtained in accordance with Regulatory Position C.6.b of Regulatory Guide 1.52, Revision 2, March 1978, meets the laboratory testing criteria of Regulatory Position C.6.a of Regulatory Guide 1.52, Revision 2, March 1978.
  3. Verifying a train flow rate of 4000 cfm  $\pm$  10% during subsystem operation when tested in accordance with ANSI N510-1975.
- c. After every 720\*\* hours of charcoal adsorber operation by verifying within 31 days after removal that a laboratory analysis of a representative carbon sample obtained in accordance with Regulatory Position C.6.b of Regulatory Guide 1.52, Revision 2, March 1978, meets the laboratory testing criteria of Regulatory Position C.6.a of Regulatory Guide 1.52, Revision 2, March 1978.
- d. At least once per <sup>24</sup>18 months by:
1. Verifying that the pressure drop across the combined HEPA filters and charcoal adsorber banks is less than 8 inches Water Gauge while operating the train at a flow rate of 4000 cfm  $\pm$  10%.

\*\*This surveillance shall include the recirculating charcoal filter, "odor eater," in the normal control room supply filter train using ANSI N510-1975 as a guide to verify  $\geq$  70% efficiency in removing freon test gas.

\*\*Except that recirculating charcoal filter samples shall be removed and analyzed at least once per 18 months.

Information Only,  
No changes

PLANT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

2. Verifying that on each of the below pressurization mode actuation test signals, the emergency train automatically switches to the pressurization mode of operation and the control room is maintained at a positive pressure of 1/8 inch W.G. relative to the adjacent areas during emergency train operation at a flow rate less than or equal to 4000 cfm:
  - a) Outside air smoke detection, and
  - b) Air intake radiation monitors.
3. Verifying that the heaters dissipate  $20 \pm 2.0$  Kw when tested in accordance with ANSI N510-1975. This reading shall include the appropriate correction for variations from 480 volts at the bus.
  - e. After each complete or partial replacement of a HEPA filter bank by verifying that the HEPA filter banks remove greater than or equal to 99% of the DOP when they are tested in-place in accordance with ANSI N510-1975 while operating the system at a flow rate of 4000 cfm  $\pm 10\%$ .
  - f. After each complete or partial replacement of a charcoal adsorber bank<sup>##</sup> by verifying that the charcoal adsorbers remove 99% of a halogenated hydrocarbon refrigerant test gas when they are tested in-place in accordance with ANSI N510-1975 while operating the system at a flow rate of 4000 cfm  $\pm 10\%$ .

<sup>##</sup> This surveillance shall include the recirculating charcoal filter, "odor eater," in the normal control room supply filter train using ANSI N510-1975 as a guide to verify  $\geq 70\%$  efficiency in removing freon test gas.

ATTACHMENT B  
PROPOSED AMENDMENTS TO THE  
LICENSE/TECHNICAL SPECIFICATIONS

INSERT A

\*\* During fuel cycle 8, a one-time allowed outage time extension to 30 days is granted for each train, one at a time, to allow for modification of the charcoal adsorber section of each train.

PLANT SYSTEMS

3/4.7.2 CONTROL ROOM AND AUXILIARY ELECTRIC EQUIPMENT ROOM EMERGENCY  
FILTRATION SYSTEM

LIMITING CONDITION FOR OPERATION

3.7.2 Two independent control room and auxiliary electric equipment room emergency filtration system trains shall be OPERABLE.<sup>6</sup>

APPLICABILITY: All OPERATIONAL CONDITIONS and <sup>a</sup>.

ACTION:

- a. With one emergency filtration system train inoperable, restore the inoperable train to OPERABLE status within 7 days or:
  1. In OPERATIONAL CONDITIONS 1, 2, 3, be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.
  2. In OPERATIONAL CONDITION 4, 5 or <sup>a</sup>, initiate and maintain operation of the OPERABLE emergency filtration system in the pressurization mode of operation.
- b. With both emergency filtration system trains inoperable, in OPERATIONAL CONDITION 4, 5 or <sup>a</sup>, suspend CORE ALTERATIONS, handling of irradiated fuel in the secondary containment and operations with a potential for draining the reactor vessel.
- c. The provisions of Specification 3.0.3 are not applicable in Operational Condition <sup>a</sup>.



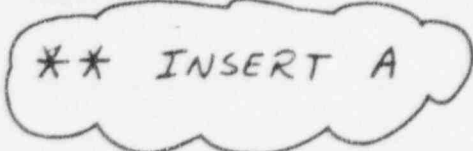
SURVEILLANCE REQUIREMENTS

4.7.2 Each control room and auxiliary electric equipment room emergency filtration system train shall be demonstrated OPERABLE:

- a. At least once per 31 days on a STAGGERED TEST BASIS by initiating, from the control room, flow through the HEPA filters and charcoal adsorbers and verifying that the train operates for at least 10 hours with the heaters OPERABLE.

<sup>a</sup>When irradiated fuel is being handled in the secondary containment.

<sup>6</sup>The normal or emergency power source may be inoperable in OPERATIONAL CONDITION 4, 5 or <sup>a</sup>.



## PLANT SYSTEMS

### SURVEILLANCE REQUIREMENTS (Continued)

- b. At least once per <sup>24</sup>18 months<sup>89</sup> or (1) after any structural maintenance on the HEPA filter or charcoal adsorber housings, or (2) following painting, fire or chemical release in any ventilation zone communicating with the train by:
1. Verifying that the train satisfies the in-place testing acceptance criteria and uses the test procedures of Regulatory Positions C.5.a, C.5.c and C.5.d of Regulatory Guide 1.52, Revision 2, March 1978, and the train flow rate is 4000 cfm  $\pm$  10%.
  2. Verifying within 31 days after removal that a laboratory analysis of a representative carbon sample obtained in accordance with Regulatory Position C.6.B of Regulatory Guide 1.52, Revision 2, March 1978, meets the laboratory testing criteria of Regulatory Position C.6.a of Regulatory Guide 1.52, Revision 2, March 1978.
  3. Verifying a train flow rate of 4000 cfm  $\pm$  10% during subsystem operation when tested in accordance with ANSI NS10-1975.
- c. After every 720<sup>hrs</sup> hours of charcoal adsorber operation by verifying within 31 days after removal that a laboratory analysis of a representative carbon sample obtained in accordance with Regulatory Position C.6.b of Regulatory Guide 1.52, Revision 2, March 1978, meets the laboratory testing criteria of Regulatory Position C.6.a of Regulatory Guide 1.52, Revision 2, March 1978.
- d. At least once per <sup>24</sup>18 months by:
1. Verifying that the pressure drop across the combined HEPA filters and charcoal adsorber banks is less than 8 inches Water Gauge while operating the train at a flow rate of 4000 cfm  $\pm$  10%.

<sup>89</sup>This surveillance shall include the recirculating charcoal filter, "odor eater," in the normal control room supply filter train using ANSI NS10-1975 as a guide to verify  $\geq$  70% efficiency in removing freon test gas.

<sup>88</sup>Except that recirculating charcoal filter samples shall be removed and analyzed at least once per 18 months.

Information Only,  
No changes

PLANT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

2. Verifying that on each of the below pressurization mode actuation test signals, the emergency train automatically switches to the pressurization mode of operation and the control room is maintained at a positive pressure of 1/8 inch W.G. relative to the adjacent areas during emergency train operation at a flow rate less than or equal to 4000 cfm:
  - a) Outside air smoke detection, and
  - b) Air intake radiation monitors.
3. Verifying that the heaters dissipate  $20 \pm 2.0$  Kw when tested in accordance with ANSI NS10-1975. This reading shall include the appropriate correction for variations from 480 volts at the bus.
  - e. After each complete or partial replacement of a HEPA filter bank by verifying that the HEPA filter banks remove greater than or equal to 99% of the DOP when they are tested in-place in accordance with ANSI NS10-1975 while operating the system at a flow rate of 4000 cfm  $\pm 10\%$ .
  - f. After each complete or partial replacement of a charcoal adsorber bank by verifying that the charcoal adsorbers remove 99% of a halogenated hydrocarbon refrigerant test gas when they are tested in-place in accordance with ANSI NS10-1975 while operating the system at a flow rate of 4000 cfm  $\pm 10\%$ .

<sup>24</sup> This surveillance shall include the recirculating charcoal filter, "odor eater," in the normal control room supply filter train using ANSI NS10-1975 as a guide to verify  $\geq 70\%$  efficiency in removing freon test gas.

LA SALLE  
Surveillance  
Requirements  
2. Spec



ATTACHMENT C  
SIGNIFICANT HAZARDS CONSIDERATION

The charcoal adsorber filters in the Control Room and Auxiliary Equipment Room Emergency Filtration System (CREFS) trains A and B require that repair work be performed to replace the existing deep bed adsorbers with tray-type adsorbers. The work will be a longer duration than the Technical Specification (TS) 3.7.2 LCO allows for unit operation. Therefore, it is requested that the TS 3.7.2 LCO be changed one time for each subsystem to allow unit operation in all operational conditions with one inoperable filtration train for a duration of 30 days if the other train is operable at all times. The change is applicable to both Unit 1 and Unit 2.

In addition, the TS Surveillance Requirements 4.7.2.b and 4.7.2.d specify an 18 month interval for testing the filter trains to verify operability of the equipment. Since the LaSalle Station Units 1 and 2 are going to a 24 month fuel cycle, it is requested the surveillance interval be changed from "at least once per 18 months" to "at least once per 24 months".

ComEd 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 10 CFR 50.92, 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:

This Technical Specification change does not involve accident initiators or initial accident assumptions. The Control Room and Auxiliary Equipment Room Emergency Filtration System (CREFS) trains A and B are post-accident atmospheric cleanup components that are designed to limit the radiation exposure to personnel occupying the Control Room to 5 rem or less whole body during and following all design basis accident conditions. Therefore, this Technical Specification change does not increase the probability of occurrence of an accident previously evaluated.

CREFS trains A and B are utilized to control the onsite dose to personnel in the Control Room. This Technical Specification change extends the LCO duration for allowing each train to be inoperable one at a time from 7 days to 30 days total for the current surveillance interval. This change

## ATTACHMENT C SIGNIFICANT HAZARDS CONSIDERATION

is a one time change to allow for the repair/replacement work associated with the corroded filter unit charcoal retaining screens in the high efficiency charcoal adsorber section of each train. The Technical Specification change will require that normal preventative maintenance and testing be performed on the operable CREFS train just prior to taking the first filter train out of service for the modification. This action will ensure that the remaining subsystem is operable and ensure maximum reliability of the system. The Technical Specification change will not affect onsite dose if a DBA occurs and the operating filter unit does not fail. The operable filter unit will be sufficient to maintain the operating areas habitable. The original LCO allowed 7 day operation with only one operable train and is also susceptible to a single failure during the Allowed Outage Time. The probability that a DBA will occur coupled with the single failure of the operable train during the extended allowed outage time per the Technical Specification change is the same order of magnitude as for the current 7 day allowed outage time. Therefore, this change does not increase the consequences of an accident previously evaluated.

The extension of the surveillance interval from 18 months to 24 months extends the maximum interval between TS surveillances of the filter trains from 22.5 months to 30 months. The equipment that is affected are the CREFS filter trains A and B, which are comprised of HEPA filters, heaters, charcoal adsorbers, and fans. This equipment has a history of satisfactory surveillance testing (in-place testing and laboratory analysis of charcoal), and has had little maintenance problems for the past 5 years. Although the SER Section 6.4.1 and the RG 1.52 state that the units shall be tested every 18 months, a review of the basis documents for the testing (ANSI N510) shows that the 1975 edition recommended annual testing and later editions (1980 and 1989) state that testing be performed "at least once every operating cycle". Therefore the extension of the surveillance intervals from 18 months to 24 months will not increase the consequences of an accident previously evaluated.

ATTACHMENT C  
SIGNIFICANT HAZARDS CONSIDERATION

- 2) Create the possibility of a new or different kind of accident from any accident previously evaluated because:

This Technical Specification change will allow each train of CREFS to be inoperable one at a time for up to 30 days to repair/replace charcoal retaining screens and changes surveillance intervals from 18 months to 24 months. Prior to the extended LCO on a given train, the scheduled monthly surveillance and preventive maintenance will be performed. This Technical Specification change does not involve components that are accident initiators and therefore will not create a new or different kind of accident than those previously analyzed.

- 3) Involve a significant reduction in the margin of safety because:

The purpose of CREFS trains A and B are to control the onsite dose to personnel in the Control Room following an accident that involves a potential radiological release. Redundant filter trains are utilized to ensure that a single active failure will not impact the ability of the system to perform its safety function. Since the probability of an accident occurring during the extended Technical Specification LCO for the inoperable train in conjunction with the probability that the operable CREFS train will fail is the same order of magnitude as for the current LCO, then the proposed Technical Specification change has minimal impact on the safe operation of the plant. The CREFS trains were both determined operable following their last surveillance and no events have occurred at the plant to indicate that they may be inoperable. Normal preventative maintenance and testing will be performed on the operable CREFS train just prior to taking the first filter train out of service for the modification. This action will ensure that the remaining subsystem is operable and ensure maximum reliability of the system. The change in surveillance intervals from 18 months to 24 months will not cause a significant reduction in the margin of safety, because the previous five surveillances have been satisfactory and the equipment/components do not have a tendency to drift over time. Therefore, the proposed amendment will not significantly impact the margin of safety.

ATTACHMENT C  
SIGNIFICANT HAZARDS CONSIDERATION

Guidance has been provided in "Final Procedures and Standards on No Significant Hazards Considerations," Final Rule, 51 FR 7744, for the application of standards to license change requests for determination of the existence of significant hazards considerations. This document provides examples of amendments which are and are not considered likely to involve significant hazards considerations. These proposed amendments most closely fit the example of a change which may either result in some increase to the probability or consequences of a previously analyzed accident or may reduce in some way a safety margin, but where the results of the change are clearly within all acceptable criteria with respect to the system or component specified in Standard Review Plan.

This proposed amendment does not involve a significant relaxation of the criteria used to establish safety limits, a significant relaxation of the bases for the limiting safety system settings or a significant relaxation of the bases for the limiting conditions for operations. Therefore, based on the guidance provided in the Federal Register and the criteria established in 10 CFR 50.92(c), the proposed change does not constitute a significant hazards consideration.

**ATTACHMENT D**  
**ENVIRONMENTAL ASSESSMENT STATEMENT APPLICABILITY**  
**REVIEW**

ComEd has evaluated the proposed amendment against the criteria for identification of licensing and regulatory actions requiring environmental assessment in accordance with 10 CFR Part 51.21. It has been determined that the proposed changes meet the criteria for categorical exclusion as provided for under 10 CFR Part 51.22(c)(9). This conclusion has been determined because the changes requested do not pose significant hazards considerations or do not involve a significant increase in the amounts, and no significant changes in the types of any effluents that may be released off-site. Additionally, this request does not involve a significant increase in individual or cumulative occupational radiation exposure.