



July 15, 1996

United States Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D.C. 20555

Subject: LaSalle County Nuclear Power Station Units 1 and 2
Application for Amendment of Facility Operating
Licenses NPF-11 and NPF-18, Appendix A, Technical
Specifications, Sections 3/4.3.7.9, 3/4.7.5, 3/4.7.6, and
6.1.C.4.
NRC Docket Nos. 50-373 and 50-374

Reference: G. Benes letter to USNRC, dated May 19, 1995,
Application for Amendment to Facility Operating License
NPF-11 and NPF-18, Appendix A, Technical
Specifications.

Pursuant to 10 CFR 50.90, ComEd proposes to revise Appendix A, Technical Specifications. The change proposes to relocate the fire protection requirements of the following Technical Specification sections: 3/4.3.7.9, Fire Detection Instrumentation; 3/4.7.5, Fire Suppression Systems; 3/4.7.6, Fire Rated Assemblies; and 6.1.C.4, Fire Brigade Staffing. This submittal also requests the replacement of the existing Fire Protection License conditions with the standard license condition for a fire protection program as suggested in Generic Letter 86-10.

Due to submittal of this change to remove the Fire Protection Requirements from the Technical Specifications, ComEd withdraws the Reference amendment proposal which was submitted on May 19, 1995. The Reference amendment proposal involved revising the technical specification requirements for fire protection valves that are inaccessible during plant operations.

This proposed amendment request is subdivided as follows:

1. Attachment A gives a description and safety analysis of the proposed changes in this amendment.

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2. Attachment B describes ComEd's evaluation performed in accordance with 10 CFR 50.92 (c), which confirms that no significant hazard consideration is involved.
3. Attachment C provides an Environmental Assessment Applicability Review per 10 CFR 51.21.
4. Attachment D includes a summary of the proposed changes, marked-up License/Technical Specifications pages for LaSalle Units 1 and 2 with the requested changes indicated, and the status of Fire Protection License Conditions.

This proposed amendment has been reviewed and approved by ComEd On-Site and Off-Site Review in accordance with procedures.

There are no specific schedule requirements, therefore, ComEd requests that this amendment be approved within approximately 9 months, i.e., by May 1, 1997 with an implementation time of 60 days.

ComEd is notifying the State of Illinois of this application for amendment by transmitting a copy of this letter and its attachments to the designated state official.

If there are any further questions or comments concerning this submittal, please refer them to JoEllen Burns at (815) 357-6761, extension 2383.

Respectfully,



R. E. Querio
Site Vice President
LaSalle County Station

Enclosures

cc: H. J. Miller, NRC Region III Administrator
P. G. Brochman, NRC Senior Resident Inspector - LaSalle
D. M. Skay, Project Manager - NRR - LaSalle
F. Niziolek, Office of Nuclear Facility Safety - IDNS
Central File

STATE OF ILLINOIS

COUNTY OF LASALLE

IN THE MATTER OF

COMMONWEALTH EDISON COMPANY

LASALLE COUNTY - UNITS 1 & 2

Docket Nos. 50-373
50-374

FFIDAVIT

I affirm that the content of this transmittal is true and correct to the best of my knowledge, information and belief.

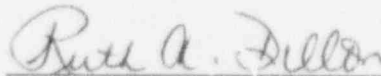


R. E. Querio
Site Vice President
LaSalle County Station

Subscribed and sworn to before me, a Notary Public in and for the State and County above named, this 15th day of

July, 1996
March 25, 199
2000

My Commission expires on



Notary Public

ATTACHMENT A
DESCRIPTION AND SAFETY ANALYSIS OF PROPOSED CHANGES

Description of the Proposed Change

The proposed change relocates the Fire Protection Requirements from each unit's operating license and Technical Specifications to the Fire Protection Program (consisting of the UFSAR, station procedures, and station Administrative Technical Requirements) in accordance with NRC Generic Letter (GL) 86-10, "Implementation of Fire Protection Requirements," and GL 88-12, "Removal of Fire Protection Requirements from Technical Specifications". This amendment will simplify the Technical Specifications while appropriately maintaining controls for the Fire Protection Program.

The change proposes to relocate the fire protection requirements of the following Technical Specification sections: 3/4.3.7.9, Fire Detection Instrumentation; 3/4.7.5, Fire Suppression Systems; 3/4.7.6, Fire Rated Assemblies; and 6.1.C.4, Fire Brigade Staffing. This submittal also requests the replacement of the existing Fire Protection License conditions with the standard license condition for a fire protection program as suggested in GL 86-10.

Description of the Current Operating License/Technical Specification Requirement

The Fire Suppression Systems Technical Specifications provide operability requirements for Fire Suppression Systems in accordance with Surveillance Requirements contained in 4.7.5. In the event that portions of the fire suppression systems are inoperable, alternate backup firefighting equipment is required to be made available in the affected areas until the inoperable equipment is restored to service. Additionally, action statements include continuous or hourly fire watch requirements.

The Fire Rated Assemblies Technical Specifications provides operability requirements for Fire Rated Assemblies in accordance with Surveillance Requirements contained in 4.7.6. In the event that fire rated assemblies are inoperable, fire watch patrols in the affected areas are required until inoperable assemblies are restored to operable status.

The Fire Detection Instrumentation Technical Specifications provide operability requirements for the fire detection instrumentation for each fire detection zone of LaSalle Units 1 and 2 in accordance with Surveillance Requirements contained in 4.3.7.9.1 and 4.3.7.9.2. In the event that a portion of the fire detection instrumentation is inoperable, fire watch patrols in the affected areas are required to provide detection capability until the inoperable instrumentation is restored to operability.

Specification 6.1.C.4 delineates the requirements for minimum staffing of the station Fire Brigade.

Bases for the Current Requirement

Per the bases of specification 3/4.3.7.9, the operability of the fire detection instrumentation ensures that adequate warning capability is available for the prompt detection of fires.

Per the bases of specification 3/4.7.5, the operability of the fire suppression systems ensures that adequate fire suppression capability is available to confine and extinguish fires occurring in any portion of the facility where safety related equipment is located. The fire suppression system consists of the water system, deluge and/or sprinklers, CO₂ systems, and fire hose

stations. The collective capability of the fire suppression systems is adequate to minimize potential damage to safety related equipment and is a major element in the facility fire protection program.

Per the bases of specification 3/4.7.6, the operability of the fire barriers and barrier penetrations ensure that fire damage will be limited. These design features minimize the possibility of a single fire involving more than one fire area prior to detection and extinguishment.

Description of the Need for Amending the Technical Specification

LaSalle is in the process of developing license amendment packages for conversion to the Improved Standard Technical Specifications. The NRC is fully cognizant of LaSalle's intent to convert to the Improved Technical Specifications. Efforts are directed towards submitting this conversion amendment to the NRC in July 1996. The Improved Standard Technical Specifications remove the fire protection requirements from the Technical Specifications. However, ComEd believes it is important to remove the fire protection requirements as soon as practical. The removal of the fire protection requirements will reduce the size and complexity of the Technical Specifications which the operators must presently deal with. The relocation of the fire protection Technical Specifications to the Fire Protection Program is an administrative measure which will permit program changes to be made under the provisions of 10CFR50.59. LaSalle will no longer need to submit license amendments subject to the proposed standard license condition in order to revise the Fire Protection Program. This will relieve both the NRC and ComEd of the associated administrative burdens. Following the relocation of the Technical Specifications fire protection requirements to the UFSAR, station Administrative Technical Requirements, and station procedures, the Fire Protection Program may be revised such that unnecessary requirements are removed from the program, and overly conservative requirements are modified. This will provide LaSalle Station with the opportunity to devote the appropriate time and resources to improve significant Fire Protection issues.

Description of the Amended Technical Specification Requirements

The removal of fire protection requirements from the Technical Specifications is requested in accordance with the guidance in GL 86-10 and GL 88-12. The following paragraphs address the five elements that the GLs recommend be included in the license amendment request.

1. The guidance of GL 86-10 requires that the fire protection program be incorporated into the UFSAR. LaSalle's Fire Protection System is presented in UFSAR Section 9.5.1; LaSalle's Fire Hazards Analysis, including the Safe Shutdown Analysis, are incorporated in Appendix H of the UFSAR. Attachment G contains the latest versions of LaSalle's Fire Protection Program license conditions. Changes to the Fire Protection Program reflecting the standard license condition will not be made until this proposed amendment is approved.
2. The LCOs, Surveillance Requirements, and associated bases for fire detection systems, fire suppression systems, fire barriers, and the administrative controls that address fire brigade staffing would be relocated from the Technical Specifications. Technical Specification sections 3/4.3.7.9, Fire Detection Instrumentation; 3/4.7.5, Fire Suppression Systems; 3/4.7.6, Fire Rated Assemblies; and 6.1.C.4, Fire Brigade Staffing, will therefore be relocated from the Technical Specifications into a LaSalle Administrative Technical Requirement document. GL 88-12 also states that existing administrative controls related to fire protection audits be retained in the station Technical Specifications. Reference 1 relocated the entire audit section of Technical Specifications to the company approved Quality Assurance Topical Report in accordance with the Improved Technical

Specifications (NUREG-1433/1434 for BWR-4/BWR-6, respectively).

3. All operational conditions, remedial actions, and test requirements presently included in the Technical Specifications for these systems, as well as the fire brigade staffing requirements, shall be incorporated into the Fire Protection Requirements, as an amendment to LaSalle Administrative Technical Requirements.
4. The standard fire protection license condition in GL 86-10 must be included in the license. Any other current fire protection license conditions shall be removed. Thus, License Condition 2.c.25 for Unit 1 and 2.c.15 for Unit 2 are being revised to include only the standard license condition. For completeness, Attachment G, "LaSalle Fire Protection License Condition Status", shows that all items for Unit 1 License Condition 2.c.25, Unit 2 License Condition 2.c.15, and Unit 2 License Condition Attachments 1.E and 1.F have been completed.
5. GL 88-12 requires that the Administrative Controls section of the Technical Specifications be augmented to support the Fire Protection program. This shall be accomplished in two ways.

The Onsite Review and Investigative Function is responsible for reviewing the Fire Protection Program and implementing procedures, and the submittal of recommended changes to the corporate Offsite Review Group. This requirement has been relocated to the approved Quality Assurance Topical Report per Reference 1.

Additionally, Technical Specification 6.2.A.g requires that written procedures be prepared, implemented, and maintained for Fire Protection Program implementation.

Bases for the Amended Technical Specification Request

All requirements currently contained in the affected Fire Protection Technical Specifications will be incorporated into the Fire Protection Program in accordance with the guidance of GL 86-10 and 88-12. The Fire Protection System is contained in Section 9.5.1 in accordance with the format of Regulatory Guide 1.70, Revision 2. UFSAR Appendix H contains the Fire Hazards Analysis and Safe Shutdown Analysis. Changes to the Fire Protection Program are required to be evaluated in accordance with 10CFR50.59, and to be approved by station senior management. The proposed changes will be evaluated to verify that they do not adversely affect the ability of the plant to achieve and maintain safe shutdown in the event of a fire. The proposed change will not modify the existing fire protection requirements. The proposed license condition will require that the Fire Protection Program, including the relocated Fire Protection Technical Specifications, be implemented and maintained in effect. 3/4.7.5, Fire Suppression Systems, 3/4.7.6, Fire Rated Assemblies, and 3/4.3.7.9, Fire Detection Instrumentation will be relocated to Administrative Technical Requirements.

The 10CFR50.59 process will control future proposed changes for the relocated specifications. Additionally, the proposed license condition for the Fire Protection Program change process ensures that changes do not adversely affect the ability to achieve and maintain safe shutdown in the event of a fire and is consistent with GL 86-10. Prior NRC approval is required for changes that are considered to adversely affect the ability to achieve and maintain safe shutdown. The UFSAR will be updated periodically pursuant to 10CFR 50.71 to reflect any changes to the Fire Protection Program, including the relocated Specifications. These controls, when combined with the surveillance tracking program utilized at the station, will ensure that the requirements of the Fire Protection Program are effectively implemented following the relocation of the Fire Protection Technical Specifications.

ATTACHMENT B

EVALUATION OF SIGNIFICANT HAZARDS CONSIDERATIONS

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:

This amendment request does not involve any actual changes to the fire protection systems at the station. It involves an administrative change which relocates the control of the Fire Protection Program from each unit's operating license and technical specifications to the station Fire Protection Program, as suggested in Generic Letters 86-10 and 88-12. Therefore, the relocation of these controls does not affect the assumptions for any of the accident analysis contained in Chapter 15 of the UFSAR.

The Fire Protection Technical Specifications which are to be relocated to the Fire Protection Program will be controlled by the proposed fire protection license condition and 10CFR 50.59. These controls ensure that the requested changes maintain the same level of control for the Fire Protection Program as that which currently exists in the Technical Specifications. Therefore, this change is administrative in nature and does not involve a significant increase in the probability or consequences of an accident previously evaluated.

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

This amendment request does not involve any physical changes to the fire protection systems or reduce the level of control of the Fire Protection Program. It therefore does not create the possibility of a new or different type of accident than any previously described in the UFSAR.

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

The same level of control which is currently applied to the Fire Protection Program by the limiting conditions for operation and the surveillance requirements of the technical specifications will be included in the controls applied by the unit licenses and the Fire Protection Program. Therefore, the margin of safety as defined in the technical specification bases will not be reduced by this proposed amendment.

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. This proposal most closely resembles the example of a purely administrative change.

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 C

ENVIRONMENTAL ASSESSMENT

Commonwealth Edison 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.