

Commonwealth Edison Company  
LaSalle Generating Station  
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**ComEd**

June 19, 1997

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

**Subject:** LaSalle County Nuclear Power Station Units 1 and 2  
Supplement to Application for Amendment of Facility  
Operating Licenses NPF-11 and NPF-18, Appendix A,  
Technical Specification Changes to Relocate Fire  
Protection Requirements  
NRC Docket Nos. 50-373 and 50-374

**Reference:** R. Querio to U.S. NRC letter dated July 15, 1996,  
Application for Amendment of Facility Operating  
Licenses NPF-11 and NPF-18, Appendix A, Technical  
Specification Changes to Relocate Fire Protection  
Requirements

Pursuant to 10 CFR 50.90, Commonwealth Edison Company submitted the Referenced document to revise the Technical Specifications to relocate fire protection requirements. The purpose of this letter is to supplement the Referenced letter based on discussions during conference calls between the NRR Project Manager for LaSalle and ComEd on November 8, 1996, and May 22, 1997.

1. The Referenced document addressed the five elements that GL 86-10 and 88-12 recommended be included in the license amendment. Item 1 of Description of the Amended Technical Specification Requirements, should be changed as follows:

"In accordance with GL 86-10, LaSalle's NRC-approved Fire Protection Program has been incorporated into the U<sup>F</sup>SAR. The NRC-approved Fire Protection program includes the fire protection and post-fire safe shutdown systems necessary to satisfy NRC guidelines and requirements; administrative and technical controls;

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the fire brigade and fire protection related technical staff; and other related plant features which have been described by the licensee in the FSAR, fire hazards analysis, responses to staff requests for additional information, comparisons of plant designs to applicable NRC fire protection guidelines and requirements, and descriptions of the methodology for assuring safe plant shutdown following a fire. Attachment D includes 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."

The key attributes of the approved fire protection program are incorporated into the UFSAR, as follows:

- a. The fire protection and post-fire safe shutdown systems necessary to satisfy NRC guidelines are provided in Appendix H of the UFSAR (i.e., Fire Hazards Analysis and Safe Shutdown Analysis).
- b. The administrative and technical controls will be included in the UFSAR by referencing the station Administrative Technical Requirements (ATR). The Fire Protection Limiting Condition for Operation and Surveillance requirements that were in the Technical Specifications will be transferred, without changes, into the ATR prior to implementing the fire protection license amendment. In accordance with the standard fire protection license condition, future changes to the ATR will require a review to ensure an unreviewed safety question does not exist (i.e., 10 CFR 50.59). The revised marked up UFSAR change is included as an attachment to this letter (Attachment A).
- c. The fire brigade, fire protection related technical staff, and other organizational information (i.e., Fire Marshal, Management, etc...) is described in the Station Administrative Procedure for Implementing the Fire Protection Program (LAP 900-14). These attributes will be included in the UFSAR by referencing the Administrative Procedure. In accordance with the standard fire protection license condition, future changes to the Administrative Procedure require a review to ensure an unreviewed safety question does not exist (i.e., 10 CFR 50.59). The revised marked up UFSAR change is included as an attachment to this letter (Attachment A).
- d. Other related plant features which have been described in the FSAR, fire hazards analysis, and descriptions of the methodology for assuring safe plant shutdown following a fire are included in the UFSAR (i.e., Section 9.5 and Appendix H).

- e. Responses to staff requests for additional information for fire protection are contained in the FSAR Questions & Answers, Series Q010.50.
- f. The comparisons of plant designs to applicable NRC fire protection guidelines and requirements (Appendix A), and the descriptions of the methodology for assuring safe plant shutdown following a fire (Appendix R) are provided in Section 9.5 and Appendix H of the UFSAR.

The UFSAR changes described above to support the amendment will be reviewed and approved by ComEd On-Site Review in accordance station procedures prior to implementation of the license amendment following NRC approval.

- 2. Item 4 of Description of the Amended Technical Specification Requirements of the Referenced document stated: "...For completeness, Attachment G, "LaSalle Fire Protection License Condition Status",...". As discussed above, Attachment D (not Attachment G) includes the LaSalle Fire Protection License Condition Status.
- 3. Item 5 of Description of the Amended Technical Specification Requirements of the Referenced document states: "...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. ..." A description of Reference 1 was inadvertently not included with the Referenced document. Reference 1 refers to the October 20, 1995 letter from R. Capra to D. Farrar, that issued Technical Specification Section 6 amendments for ComEd plants.
- 4. Attachment D of the Referenced document included the proposed changes to the License and Technical Specifications. The fire protection license conditions are being revised to include only the standard fire protection license condition in GL 86-10. The Referenced submittal did not include the exact wording from GL 86-10. Also, the Referenced submittal did not delete the asterisk associated with Technical Specification section 6.1.C.4 (which is being deleted). The revised marked up License and Technical Specification pages are included as an attachment to this letter (Attachment B).

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

The original Significant Hazards Consideration, that was included in the Referenced submittal, remains valid.

If there are any questions or comments concerning this letter, please refer them to Perry Barnes, at (815) 357-6761, extension 2383.

Respectfully,

A handwritten signature in black ink, appearing to read 'W. T. Subalusky', with a long horizontal flourish extending to the right.

W. T. Subalusky  
Site Vice President  
LaSalle County Station

Enclosure

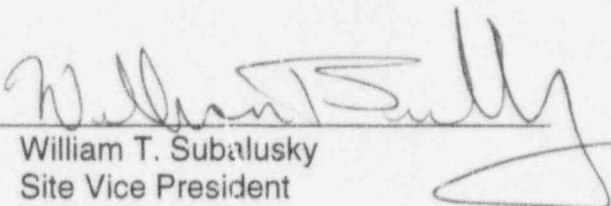
cc: A. B. Beach, NRC Region III Administrator  
M. P. Huber, NRC Senior Resident Inspector - LaSalle  
D. M. Skay, Project Manager - NRR - LaSalle  
F. Niziolek, Office of Nuclear Facility Safety - IDNS

STATE OF ILLINOIS )  
COUNTY OF LASALLE )  
IN THE MATTER OF )  
COMMONWEALTH EDISON COMPANY )  
LASALLE COUNTY STATION - UNITS 1 & 2 )

Docket Nos. 50-373  
50-374

**AFFIDAVIT**

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

  
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William T. Subalusky  
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 18<sup>th</sup> day of June, 1997. My Commission expires on 10-1, 2000.

