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ComEd

July 1, 1997

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, changing the definition of Channel Calibration and correcting miscellaneous errors in the Technical Specifications and Bases.
NRC Docket Nos. 50-373 and 50-374

Pursuant to 10 CFR 50.90, Commonwealth Edison Company (ComEd) proposes to revise Appendix A, Technical Specifications of Facility Operating Licenses NPF-11 and NPF-18, LaSalle County Station Units 1 and 2. The proposed changes include changes to the Technical Specifications (TS) to change the definition of Channel Calibration and correcting miscellaneous errors in the Technical Specifications and Bases. The TS affected are TS definition 1.4, Channel Calibration; TS Table 3/4.3.2-1, Isolation Actuation Instrumentation; TS Table 3/4.3.6-1, Control Rod Block Instrumentation; and the Bases for TS 3/4.3.1, Reactor Protection System instrumentation. The proposed changes to the definition of Channel Calibration are consistent with the definition in NUREG 1434, Standard Technical Specifications General Electric Plants, BWR/6, Revision 1. The remaining proposed changes correct several errors in the TS and Bases of the TS.

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This proposed amendment request is subdivided as follows:

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

2. Attachment B includes the marked-up License/Technical Specifications pages for LaSalle Units 1 and 2 with the requested changes indicated.

3. Attachment C describes ComEd's evaluation performed in accordance with 10 CFR 50.92 (c), which confirms that no significant hazard consideration is involved.

4. Attachment D provides an Environmental Assessment Applicability Review per 10 CFR 51.21.

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

ComEd requests approval of this amendment request prior to the start up of either Unit 1 or Unit 2. LaSalle Unit 1 is currently scheduled to start up on December 15, 1997, prior to Unit 2. The amendment is requested to be in effect upon issuance, to be implemented within 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 Perry Barnes at (815) 357-6761, extension 2383.

Respectfully,

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)

Docket Nos. 50-373
50-374

IN THE MATTER OF)

COMMONWEALTH EDISON COMPANY)

LASALLE COUNTY STATION - UNITS 1 & 2)

AFFIDAVIT

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

William T Subalusky

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 31 day of July, 1997. My Commission expires on 10-1, 2000.

Debra J. Feeney

Notary Public

OFFICIAL SEAL
DEBRA J. FEENEY
NOTARY PUBLIC, STATE OF ILLINOIS
MY COMMISSION EXPIRES10-1-2000

ATTACHMENT A
DESCRIPTION OF SAFETY ANALYSIS OF THE PROPOSED CHANGES

Description of the Proposed Change

Miscellaneous Changes:

a. **The definition of Channel Calibration does not include an exemption for the calibration of thermocouple and resistance temperature detector (RTD) sensors, which cannot be calibrated/adjusted. Therefore the definition is being changed to perform an in place qualitative assessment of Thermocouple and RTD sensors.**

b. **TS Table 3.3.2-1 Isolation Actuation Instrumentation, item B.2, Outboard Valve isolation incorrectly lists isolation group 7 as receiving a containment manual isolation signal. Containment isolation group 7 only contains inboard automatic isolation valves for the Transversing In-core Probe (TIP) system. Group 7 is proposed to be removed from the outboard manual isolation function, since there are no automatic outboard isolation valves for the TIP system.**

c. **TS Table 3.3.6-1, Control Rod Withdrawal Block Instrumentation Trip Function 4.a., Intermediate Range Monitors (IRM) Detector not full-in rod block is modified by Table Note e. Table note e only applies to the IRM Downscale rod block, Trip Function 4.d. Note e is proposed to be deleted from Trip Function 4.a.**

d. **TS Bases section 3/4.3.1, Reactor Protection System Instrumentation, has a typographical error. The last paragraph on page 3/4 3-1, should refer to Note ## instead of Note #.**

ATTACHMENT A
DESCRIPTION OF SAFETY ANALYSIS OF THE PROPOSED CHANGES

Description of the Current Operating License/Technical Specification Requirement

a. The current definition of Channel Calibration does not exclude thermocouple or RTD sensors. The definition is as follows:

"CHANNEL CALIBRATION

1.4 A CHANNEL CALIBRATION shall be the adjustment, as necessary, of the channel output such that it responds with the necessary range and accuracy to known values of the parameter which the channel monitors. The CHANNEL CALIBRATION shall encompass the entire channel including the sensor and alarm and/or trip functions, and shall include the CHANNEL FUNCTIONAL TEST. The CHANNEL CALIBRATION may be performed by any series of sequential, overlapping or total channel steps such that the entire channel is calibrated."

b. TS Table 3.3.2-1, Isolation Actuation Instrumentation, includes Manual Initiations. The isolation valve group 7 is for the automatic TIP isolation valves, which are only inboard isolation valves. The valve groups operated by signal column for B.2 includes "1, 2, 5, 6, 7". It should not include group 7.

c. TS Table 3.3.6-1, Control Rod Withdrawal Block Instrumentation, Trip Function 4.a is modified by Note e. This note only applies to Trip Function 4.d. Note (e) is as follows:

(e) "This function shall be automatically bypassed when the IRM channels are on range 1."

d. TS Bases section 3/4.3.1, Reactor Protection System Instrumentation, refers to Note # in the last paragraph on page B 3/4 3-1. Note # should be Note ##, which is as follows:

"Sensor is eliminated from response time testing for the RPS circuits. Response time testing and conformance to the administrative limits for the remaining channel including trip unit and relay logic are required."

ATTACHMENT A
DESCRIPTION OF SAFETY ANALYSIS OF THE PROPOSED CHANGES

Bases for the Current Requirement

a. The current definition of Channel Calibration was from NUREG-123, BWR-5 Standard Technical Specifications and did not acknowledge the difficulty in including thermocouple and RTD sensors.

b. The TS requirement for manual isolation of automatic outboard isolation valves for the TIP system is an error that has existed since the draft LaSalle TS prior to the issuance of the Unit 1 Facility Operating License, NPF-11. This is apparently an oversight in the previous reviews of this TS.

c. The TS requirement to automatically bypass the IRM Detector-not-full-in rod block when the IRM channels are on range 1 is an error that has existed since the draft LaSalle TS prior to the issuance of the Unit 1 Facility Operating License, NPF-11. This rod block was to assure the IRM detectors are at the proper in-core position for Control Rod withdrawal during refuel and startup modes. This is apparently an oversight in the previous reviews of this TS.

d. The incorrect Note # reference at the bottom of TS Bases page 3/4 3-1 was an error in the pages issued for amendments 114 for Unit 1 and 99 for Unit 2. The information applies to Note ##.

Description of the Need for Amending the Technical Specification

These miscellaneous changes were found during system/ TS reviews by either Systems Engineers or the System Functional Performance Reviews. The first miscellaneous change is needed based on a review of NUREG 1434, Standard Technical Specifications General Electric Plants, BWR/6, definition of Channel Calibration. The remaining items are errors not previously detected. In each case, except for the Bases correction, the errors are significant in that TS compliance is not possible without correction of the errors. These changes are needed prior to startup of either unit.

ATTACHMENT A
DESCRIPTION OF SAFETY ANALYSIS OF THE PROPOSED CHANGES

Description of the Amended Technical Specification Requirement

a. The definition of CHANNEL CALIBRATION is proposed to be changed to the definition of CHANNEL CALIBRATION in NUREG 1434, which is as follows:

"CHANNEL CALIBRATION

A CHANNEL CALIBRATION shall be the adjustment, as necessary, of the channel output such that it responds within the necessary range and accuracy to known values of the parameter that the channel monitors. The CHANNEL CALIBRATION shall encompass the entire channel, including the required sensor, alarm, display, and trip functions, and shall include the CHANNEL FUNCTIONAL TEST. Calibration of instrument channels with resistance temperature detector (RTD) or thermocouple sensors may consist of an inplace qualitative assessment of sensor behavior and normal calibration of the remaining adjustable devices in the channel. The CHANNEL CALIBRATION may be performed by means of any series of sequential, overlapping, or total channel steps so that the entire channel is calibrated."

b. TS Table 3.3.2-1, Trip Function B.2, valve groups operated by the manual isolation signal is proposed to be changed to delete TIP isolation valves group 7 from the list.

c. Note (e) is proposed to be deleted from Trip Function 4.a in TS Table 3.3.6-1.

d. Note # is proposed to be corrected to be Note ## in the last paragraph on Bases page B 3/4 3-1.

Bases for the Amended Technical Specification Request

a. The definition of CHANNEL CALIBRATION from NUREG 1434 provides an exception for thermocouple and RTD sensors. These devices are not adjustable and in some cases are not accessible, such as the suppression chamber water temperature sensors. Thermocouple and RTD sensor

checks consist of an inplace qualitative assessment, which is not provided by the current LaSalle definition. The proposed definition clearly states this allowance for these sensors and is consistent with current practice at LaSalle.

The wording of the remainder of the NUREG 1434 definition of CHANNEL CALIBRATION is slightly different from the current LaSalle definition. The wording clarifies the meaning by eliminating the potential for misapplication by rewording the following sentence:

> "The CHANNEL CALIBRATION shall encompass the entire channel including the sensor and alarm and/or trip functions, and shall include the CHANNEL FUNCTIONAL TEST."

The corresponding sentence in the proposed definition is as follows:

> "The CHANNEL CALIBRATION shall encompass the entire channel, including the *required* sensor, alarm, *display, and* trip functions, and shall include the CHANNEL FUNCTIONAL TEST."

The addition of the word "required" makes the previous "and/or" clear and no longer needed. Other differences are minor wording changes that do not change the meaning.

The allowance for a qualitative assessment of thermocouple and RTD sensors will allow compliance with the definition of CHANNEL CALIBRATION for temperature and differential temperature functions in the TS.

b. Primary containment isolation valve group 7, TIP system isolation has two valves outside of the primary containment for each of five penetrations. The inboard isolation is an automatic isolation valve that automatically closes on an inboard isolation of the primary containment due to trip functions A.1.a.(1), reactor vessel water level low, level 3; A.1.b, drywell pressure - high. In addition, Group 7 valves close on a manual initiation of the inboard valves, as required by B.1.

The outboard isolation valves for the TIP system penetrations are explosive squib valves. If a TIP system probe(s) is inserted past the inboard isolation valve(s) and will not withdraw to allow closure of the associated ball valve(s) when a valid isolation actuation signal is received, procedures require manually actuating the associated TIP system explosive squib valve(s) to shear the respective TIP cable and isolate the line. The explosive squib valves are controlled using a keylock switch in the main control room and are required to be operable by TS 3.6.3 and verified operable per TS SR 4.6.3.5 on a periodic basis. These valves are not actuated from the primary containment manual isolation logic due to the nature of the TIP system. Therefore, group 7, TIP system outboard valves, is proposed to be deleted from TS Table 3.3.2-1, Functional Unit B.2. For information, a simplified diagram of the TIP sytem component arrangement is included as Figure 1 at the end of this attachment.

c. The IRM detector-not-full-in rod block is provided so that control rod withdrawal is not permitted without the IRMs at their correct full-in position, except when the IRMs are not required to be operable. The IRMs are required to be operable by TS 3.3.1, reactor protection system instrumentation in Operational conditions 2, 3, 4, and 5, and by TS 3.3.6, rod block instrumentation in Operational Conditions 2 and 5. The detectors must be at the full-in position in order to be operable. In Operation Conditions 2 and 5, Startup and Refuel modes, respectively, the scram and rod blocks protect against the effects of local control rod errors and continuous withdrawal of control rods in sequence. They also provide backup protection for the APRMs (Average Power Range Monitors).

Therefore, the IRM detector-not-full-in rod block is designed to be functioning whenever the IRMs are required to be Operable. TS 3.3.6 requires trip function 4.a to be Operable in Operational Conditions 2 and 5. There is no automatic bypass installed for the IRM detector-not-full-in rod block other than the reactor mode switch in Run position, which bypasses all IRM trip functions. Therefore, the reference to Note (e) is proposed to be deleted from TS Table 3.3.6-1, Trip Function 4.a.

d. TS Bases 3/4.3.1 discussion concerning the TS Note exempting the sensors associated with Functional Units 3 and 4 from Response Time Testing is Note ## in TS Table 3.3.1-2. The bases section in the last

paragraph of page B 3/4 3-1 incorrectly refers to Note #, which applies to Funtional Unit 10, turbine control valve fast closure, trip oil pressure - low. Therefore, Note # in this Bases discussion should be Note ## as proposed.

Schedule

These proposed TS changes are requested to be issued prior to start up of either Unit 1 or Unit 2. LaSalle Unit 1 is currently scheduled to start up on December 15, 1997, prior to Unit 2. The amendment is requested to be in effect upon issuance, to be implemented within 60 days.

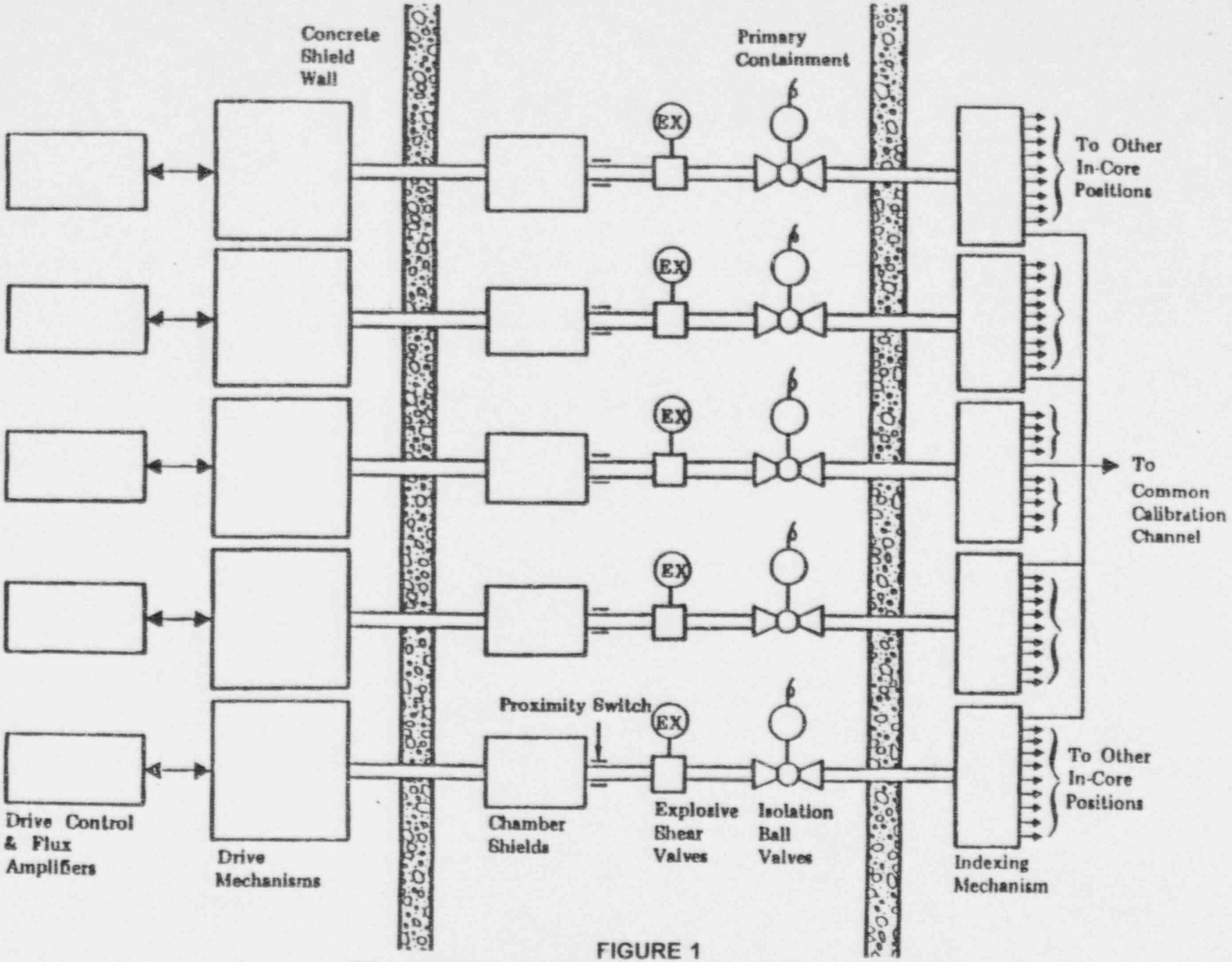

FIGURE 1
TRAVERSING IN-CORE PROBE SIMPLIFIED DIAGRAM