

ATTACHMENT B
PROPOSED AMENDMENTS TO THE
LICENSE/TECHNICAL SPECIFICATIONS

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* These pages do not have changes; they are included for information only.

1.0 DEFINITIONS

The following terms are defined so that uniform interpretation of these specifications may be achieved. The defined terms appear in capitalized type and shall be applicable throughout these Technical Specifications.

ACTION

- 1.1 ACTION shall be that part of a Specification which prescribes remedial measures required under designated conditions.

AVERAGE PLANAR EXPOSURE

- 1.2 The AVERAGE PLANAR EXPOSURE shall be applicable to a specific planar height and is equal to the sum of the exposure of all the fuel rods in the specified bundle at the specified height divided by the number of fuel rods in the fuel bundle.

AVERAGE PLANAR LINEAR HEAT GENERATION RATE

- 1.3 The AVERAGE PLANAR LINEAR HEAT GENERATION RATE (APLHGR) shall be applicable to a specific planar height and is equal to the sum of the LINEAR HEAT GENERATION RATES for all the fuel rods in the specified bundle at the specified height divided by the number of fuel rods in the fuel bundle.

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.

CHANNEL CHECK

- 1.5 A CHANNEL CHECK shall be the qualitative assessment of channel behavior during operation by observation. This determination shall include, where possible, comparison of the channel indication and/or status with other indications and/or status derived from independent instrument channels measuring the same parameter.

CHANNEL FUNCTIONAL TEST

- 1.6 A CHANNEL FUNCTIONAL TEST shall be:
- Analog channels - the injection of a simulated signal into the channel as close to the sensor as practicable to verify OPERABILITY including alarm and/or trip functions and channel failure trips.
 - Bistable channels - the injection of a simulated signal into the sensor to verify OPERABILITY including alarm and/or trip functions.

The CHANNEL FUNCTIONAL TEST may be performed by any series of sequential, overlapping, or total channel steps such that the entire channel is tested.

**ATTACHMENT B
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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 in-place 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.

TABLE 3.3.1-2

REACTOR PROTECTION SYSTEM RESPONSE TIMES

FUNCTIONAL UNIT	RESPONSE TIME (Seconds)
1. Intermediate Range Monitors:	
a. Neutron Flux - High	NA
b. Inoperative	NA
2. Average Power Range Monitor*	
a. Neutron Flux - High, Setdown	NA
b. Flow Biased Simulated Thermal Power-Upscale	≤ 0.09**
c. Fixed Neutron Flux - High	≤ 0.09
d. Inoperative	NA
3. Reactor Vessel Steam Dome Pressure - High	≤ 0.55 ^{##}
4. Reactor Vessel Water Level - Low, Level 3	≤ 1.05 ^{##}
5. Main Steam Line Isolation Valve - Closure	≤ 0.06
6. Deleted	
7. Primary Containment Pressure - High	NA
8. Scram Discharge Volume Water Level - High	NA
9. Turbine Stop Valve - Closure	≤ 0.06
10. Turbine Control Valve Fast Closure, Trip Oil Pressure - Low	≤ 0.08 [#]
11. Reactor Mode Switch Shutdown Position	NA
12. Manual Scram	NA
13. Control Rod Drive	
a. Charging Water Header Pressure - Low	NA
b. Delay Timer	NA

For information only, No changes

*Neutron detectors are exempt from response time testing. Response time shall be measured from the detector output or from the input of the first electronic component in the channel.

**Not including simulated thermal power time constant.

#Measured from start of turbine control valve fast closure.

##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.

TABLE 3.3.2-1 (Continued)

ISOLATION ACTUATION INSTRUMENTATION

<u>TRIP FUNCTION</u>	<u>VALVE GROUPS OPERATED BY SIGNAL</u>	<u>MINIMUM OPERABLE CHANNELS PER TRIP SYSTEM (b)</u>	<u>APPLICABLE OPERATIONAL CONDITION</u>	<u>ACTION</u>
5. RHR SYSTEM STEAM CONDENSING MODE ISOLATION				
a. RHR Equipment Area Δ Temperature - High	8	1/RHR area	1, 2, 3	22
b. RHR Area Temperature - High	8	1/RHR area	1, 2, 3	22
c. RHR Heat Exchanger Steam Supply Flow - High	8	1	1, 2, 3	22
6. RHR SYSTEM SHUTDOWN COOLING MODE ISOLATION				
a. Reactor Vessel Water Level - Low, Level 3	6	2	1, 2, 3	25
b. Reactor Vessel (RHR Cut-in Permissive) Pressure - High	6	1	1, 2, 3	25
c. RHR Pump Suction Flow - High	6	1	1, 2, 3	25
d. RHR Area Temperature - High	6	1/RHR area	1, 2, 3	25
e. RHR Equipment Area ΔT - High	6	1/RHR area	1, 2, 3	25
B. MANUAL INITIATION				
1. Inboard Valves	1, 2, 5, 6, 7 ^e	1/group	1, 2, 3	26
2. Outboard Valves	1, 2, 5, 6, 7 ^e	1/group	1, 2, 3	26
3. Inboard Valves	4 ^{(c)(d)}	1/group	1, 2, 3 and **, #	26
4. Outboard Valves	4 ^{(c)(e)}	1/group	1, 2, 3 and **, #	26
5. Inboard Valves	3, 8, 9	1/valve	1, 2, 3	26
6. Outboard Valves	3, 8, 9	1/valve	1, 2, 3	26
7. Outboard Valve	8 ^(h)	1/group	1, 2, 3	26

TABLE 3.3.6-1
CONTROL ROD WITHDRAWAL BLOCK INSTRUMENTATION

<u>TRIP FUNCTION</u>	<u>MINIMUM OPERABLE CHANNELS PER TRIP FUNCTION</u>	<u>APPLICABLE OPERATIONAL CONDITIONS</u>	<u>ACTION</u>
1. <u>ROD BLOCK MONITOR</u> ^(a)			
a. Upscale	2	1*	60
b. Inoperative	2	1*	60
c. Downscale	2	1*	60
2. <u>RTD</u>			
a. Flow Biased Simulated Thermal Power-Upscale	4	1	61
b. Inoperative	4	1, 2, 5	61
c. Downscale	4	1	61
d. Neutron Flux-High	4	2, 5	61
3. <u>SOURCE RANGE MONITORS</u>			
a. Detector not full in ^(b)	3	2	61
	2	5	61
b. Upscale ^(c)	3	2	61
	2	5	61
c. Inoperative ^(c)	3	2	61
	2	5	61
d. Downscale ^(d)	3	2	61
	2	5	61
4. <u>INTERMEDIATE RANGE MONITORS</u>			
a. Detector not full in ^(e)	6	2, 5	61
b. Upscale	6	2, 5	61
c. Inoperative ^(e)	6	2, 5	61
d. Downscale	6	2, 5	61
5. <u>SCRAM DISCHARGE VOLUME</u>			
a. Water Level-High	2	1, 2, 5**	62
b. Scram Discharge Volume Switch in Bypass	1	5**	62
6. <u>RECIRCULATION FLOW UNIT</u>			
a. Upscale	2	1	62
b. Inoperative	2	1	62
c. Comparator	2	1	62

CONTROL ROD WITHDRAWAL BLOCK INSTRUMENTATIONACTION

- ACTION 60 - Declare the RBM inoperable and take the ACTION required by Specification 3.1.4.3.
- ACTION 61 - With the number of OPERABLE channels:
- a. One less than required by the Minimum OPERABLE Channels per Trip Function requirement, restore the inoperable channel to OPERABLE status within 7 days or place the inoperable channel in the tripped condition within the next hour.
 - b. Two or more less than required by the Minimum OPERABLE Channels per Trip Function requirement, place at least one inoperable channel in the tripped condition within one hour.
- ACTION 62 - With the number of OPERABLE Channels less than required by the Minimum OPERABLE Channels per Trip Function requirement, place the inoperable channel in the tripped condition within 12 hours.

NOTE

- * With THERMAL POWER \geq 30% of RATED THERMAL POWER.
- ** With more than one control rod withdrawn. Not applicable to control rods removed per Specification 3.9.10.1 or 3.9.10.2.
- a. The RBM shall be automatically bypassed when a peripheral control rod is selected.
- b. This function shall be automatically bypassed if detector count rate is \geq 100 cps or the IRM channels are on range 3 or higher.
- c. This function shall be automatically bypassed when the associated IRM channels are on range 8 or higher.
- d. This function shall be automatically bypassed when the IRM channels are on range 3 or higher.
- e. This function shall be automatically bypassed when the IRM channels are on range 1.

For information
only.
No changes

3/4.3 INSTRUMENTATION

BASES

3/4.3.1 REACTOR PROTECTION SYSTEM INSTRUMENTATION

The reactor protection system automatically initiates a reactor scram to:

- a. Preserve the integrity of the fuel cladding.
- b. Preserve the integrity of the reactor coolant system.
- c. Minimize the energy which must be adsorbed following a loss-of-coolant accident, and
- d. Prevent inadvertent criticality.

This specification provides the limiting conditions for operation necessary to preserve the ability of the system to perform its intended function even during periods when instrument channels may be out of service because of maintenance. When necessary, one channel may be made inoperable for brief intervals to conduct required surveillance.

The reactor protection system is made up of two independent trip systems. There are usually four channels to monitor each parameter with two channels in each trip system. The outputs of the channels in a trip system are combined in a logic so that either channel will trip that trip system. The tripping of both trip systems will produce a reactor scram. The system meets the intent of IEEE-279, 1971, for nuclear power plant protection systems. Specified surveillance intervals and surveillance and maintenance outage times have been determined in accordance with NEDC-30851P-A, "Technical Specification Improvement Analyses for BWR Reactor Protection System", March 1988, and MDE-83-0485 Revision 3, "Technical Specification Improvement Analysis for the Reactor Protection System for LaSalle County Station, Units 1 and 2", April 1991. The bases for the trip settings of the PRS are discussed in the bases for Specification 2.2.1. When a channel is placed in an inoperable status solely for performance of required surveillances, entry into LCO and required ACTIONS may be delayed, provided the associated function maintains RPS trip capability.

The measurement of response time at the specified frequencies provides assurance that the protective functions associated with each channel are completed within the time limit assumed in the accident analysis. The RPS RESPONSE TIME acceptance criteria are included in plant Surveillance procedures. Only those functions with times assumed in the accident analysis are required to be response time tested.

As stated in Note * of Table 3.3.1-2, Neutron detectors are exempt from response time testing. In addition, for Functional Units 3 and 4, per Note * the associated sensors are not required to be response time tested. For these

##

INSTRUMENTATION

For information
Only.
No changes

BASES

3/4.3.1 REACTOR PROTECTION SYSTEM INSTRUMENTATION (Continued)

Functional Units, response time testing for the remaining channel components, including any analog trip units, is required. This allowance is supported by NEDO-32291-A, "System Analyses for the Elimination of Selected Response Time Testing Requirements," October 1995.

Response time may be demonstrated by any series of sequential, overlapping or total channel test measurement, provided such tests demonstrate the total channel response time as defined. Sensor response time verification may be demonstrated by either (1) in-place, onsite or offsite test measurements, or (2) utilizing replacement sensors with certified response times.

3/4.3.2 ISOLATION ACTUATION INSTRUMENTATION

This specification ensures the effectiveness of the instrumentation used to mitigate the consequences of accidents by prescribing the OPERABILITY trip setpoints and response times for isolation of the reactor systems. When necessary, one channel may be inoperable for brief intervals to conduct required surveillance. Both channels of each trip system for the main steam tunnel ventilation system differential temperature may be placed in an inoperable status for up to 4 hours for required reactor building ventilation system maintenance and testing and 12 hours due to loss of reactor building ventilation or for the required secondary containment Leak Rate test without placing the trip system in the tripped condition. This will allow for maintaining the reliability of the ventilation system and secondary containment. Specified surveillance intervals and surveillance and maintenance outage times have been determined in accordance with NEDC-30851P-A, Supplement 2, "Technical Specification Improvement Analyses for BWR Isolation Instrumentation Common to RPS and ECCS Instrumentation", March 1989, and with NEDC-31677P-A, "Technical Specification Improvement Analysis for BWR Isolation Actuation Instrumentation", July 1990. When a channel is placed in an inoperable status solely for performance of required surveillances, entry into LCO and required ACTIONS may be delayed, provided the associated function maintains primary containment isolation capability. Some of the trip settings may have tolerances explicitly stated where both the high and low values are critical and may have a substantial effect on safety. The setpoints of other instrumentation, where only the high or low end of the setting have a direct bearing on safety, are established at a level away from the normal operating range to prevent inadvertent actuation of the systems involved.

Except for the MSIVs, the safety analysis does not address individual sensor response times or the response times of the logic systems to which the sensors are connected. For A.C. operated valves, it is assumed that the A.C.

1.0 DEFINITIONS

The following terms are defined so that uniform interpretation of these specifications may be achieved. The defined terms appear in capitalized type and shall be applicable throughout these Technical Specifications.

ACTION

1.1 ACTION shall be that part of a Specification which prescribes remedial measures required under designated conditions.

AVERAGE PLANAR EXPOSURE

1.2 The AVERAGE PLANAR EXPOSURE shall be applicable to a specific planar height and is equal to the sum of the exposure of all the fuel rods in the specified bundle at the specified height divided by the number of fuel rods in the fuel bundle.

AVERAGE PLANAR LINEAR HEAT GENERATION RATE

1.3 The AVERAGE PLANAR LINEAR HEAT GENERATION RATE (APLHGR) shall be applicable to a specific planar height and is equal to the sum of the LINEAR HEAT GENERATION RATES for all the fuel rods in the specified bundle at the specified height divided by the number of fuel rods in the fuel bundle.

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.

CHANNEL CHECK

1.5 A CHANNEL CHECK shall be the qualitative assessment of channel behavior during operation by observation. This determination shall include, where possible, comparison of the channel indication and/or status with other indications and/or status derived from independent instrument channels measuring the same parameter.

CHANNEL FUNCTIONAL TEST

1.6 A CHANNEL FUNCTIONAL TEST shall be:

- a. Analog channels - the injection of a simulated signal into the channel as close to the sensor as practicable to verify OPERABILITY including alarm and/or trip functions and channel failure trips.
- b. Bistable channels - the injection of a simulated signal into the sensor to verify OPERABILITY including alarm and/or trip functions.

The CHANNEL FUNCTIONAL TEST may be performed by any series of sequential, overlapping, or total channel steps such that the entire channel is tested.

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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 in-place 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.

TABLE 3.3.1-2
REACTOR PROTECTION SYSTEM RESPONSE TIMES

<u>FUNCTIONAL UNIT</u>	<u>RESPONSE TIME</u> <u>(Seconds)</u>
1. Intermediate Range Monitors:	
a. Neutron Flux - High*	NA
b. Inoperative	NA
2. Average Power Range Monitor*	
a. Neutron Flux - High, Setdown	NA
b. Flow Biased Simulated Thermal Power Upscale	≤ 0.09**
c. Fixed Neutron Flux - High	≤ 0.09
d. Inoperative	NA
3. Reactor Vessel Steam Dome Pressure - High	≤ 0.55**
4. Reactor Vessel Water Level - Low, Level 3	≤ 1.05**
5. Main Steam Line Isolation Valve - Closure	≤ 0.06
6. DELETED	
7. Primary Containment Pressure - High	NA
8. Scram Discharge Volume Water Level - High	NA
9. Turbine Stop Valve - Closure	≤ 0.06
10. Turbine Control Valve Fast Closure, Trip Oil Pressure - Low	≤ 0.08 [#]
11. Reactor Mode Switch Shutdown Position	NA
12. Manual Scram	NA
13. Control Rod Drive	
a. Charging Water Header Pressure - Low	NA
b. Delay Timer	NA

*Neutron detectors are exempt from response time testing. Response time shall be measured from the detector output or from the input of the first electronic component in the channel.

**Not including simulated thermal power time constant.

#Measured from start of turbine control valve fast closure.

##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.

For information only.
No changes

TABLE 3.3.2-1 (Continued)

ISOLATION ACTUATION INSTRUMENTATION

TRIP FUNCTION	VALVE GROUPS OPERATED BY SIGNAL	MINIMUM OPERABLE CHANNELS PER TRIP SYSTEM (b)	APPLICABLE OPERATIONAL CONDITION	ACTION
5. RHR SYSTEM STEAM CONDENSING MODE ISOLATION				
a. RHR Equipment Area Δ Temperature - High	8	1/RHR area	1, 2, 3	22
b. RHR Area Temperature - High	8	1/RHR area	1, 2, 3	22
c. RHR Heat Exchanger Steam Supply Flow - High	8	1	1, 2, 3	22
6. RHR SYSTEM SHUTDOWN COOLING MODE ISOLATION				
a. Reactor Vessel Water Level - Low, Level 3	6	2	1, 2, 3	25
b. Reactor Vessel (RHR Cut-in Permissive) Pressure - High	6	1	1, 2, 3	25
c. RHR Pump Suction Flow - High	6	1	1, 2, 3	25
d. RHR Area Temperature - High	6	1/RHR area	1, 2, 3	25
e. RHR Equipment Area ΔT - High	6	1/RHR area	1, 2, 3	25
B. MANUAL INITIATION				
1. Inboard Valves	1, 2, 5, 6, 7	1/group	1, 2, 3	26
2. Outboard Valves	1, 2, 5, 6, 7	1/group	1, 2, 3	26
3. Inboard Valves	4 ^{(c)(e)}	1/group	1, 2, 3 and " "	26
4. Outboard Valves	4 ^{(c)(e)}	1/group	1, 2, 3 and " "	26
5. Inboard Valves	3, 8, 9	1/valve	1, 2, 3	26
6. Outboard Valves	3, 8, 9	1/valve	1, 2, 3	26
7. Outboard Valve	8 ^(h)	1/group	1, 2, 3	26

TABLE 3.3.6-1

CONTROL ROD WITHDRAWAL BLOCK INSTRUMENTATION

TRIP FUNCTION	MINIMUM OPERABLE CHANNELS PER TRIP FUNCTION	APPLICABLE OPERATIONAL CONDITIONS	ACTION
1. <u>ROD BLOCK MONITOR</u> ^(e)			
a. Upscale	2	1 ^a	60
b. Inoperative	2	1 ^a	60
c. Downscale	2	1 ^a	60
2. <u>APRM</u>		4	
a. Flow Biased Simulated Thermal Power-Upscale	4	1	61
b. Inoperative	4	1, 2, 5	61
c. Downscale	4	1	61
d. Neutron Flux-High	4	2, 5	61
3. <u>SOURCE RANGE MONITORS</u>			
a. Detector not full in ^(b)	3	2	61
b. Upscale ^(c)	2	2	61
c. Inoperative ^(c)	3	2	61
d. Downscale ^(d)	2	2	61
4. <u>INTERMEDIATE RANGE MONITORS</u>			
a. Detector not full in ^(e)	6	2, 5	61
b. Upscale	6	2, 5	61
c. Inoperative ^(g)	6	2, 5	61
d. Downscale	6	2, 5	61
5. <u>SCRAM DISCHARGE VOLUME</u>			
a. Water Level-High	2	1, 2, 5 ^{aa}	62
b. Scram Discharge Volume Switch In Bypass	1	5 ^{aa}	62
6. <u>RECIRCULATION FLOW UNIT</u>			
a. Upscale	2	1	62
b. Inoperative	2	1	62
c. Comparator	2	1	62

CONTROL ROD WITHDRAWAL BLOCK INSTRUMENTATION

ACTION

- ACTION 60 - Declare the RBM inoperable and take the ACTION required by Specification 3.1.4.3.
- ACTION 61 - With the number of OPERABLE channels:
- a. One less than required by the Minimum OPERABLE Channels per Trip Function requirement, restore the inoperable channel to OPERABLE status within 7 days or place the inoperable channel in the tripped condition within the next hour.
 - b. Two or more less than required by the Minimum OPERABLE Channels per Trip Function requirement, place at least one inoperable channel in the tripped condition within one hour.
- ACTION 62 - With the number of OPERABLE Channels less than required by the Minimum OPERABLE Channels per Trip Function requirement, place the inoperable channel in the tripped condition within 12 hours.

NOTE

- * With THERMAL POWER \geq 30% of RATED THERMAL POWER.
- ** With more than one control rod withdrawn. Not applicable to control rods removed per Specification 3.9.10.1 or 3.9.10.2.
- a. The RBM shall be automatically bypassed when a peripheral control rod is selected.
- b. This function shall be automatically bypassed if detector count rate is \geq 100 cps or the IRM channels are on range 3 or higher.
- c. This function shall be automatically bypassed when the associated IRM channels are on range 8 or higher.
- d. This function shall be automatically bypassed when the IRM channels are on range 3 or higher.
- e. This function shall be automatically bypassed when the IRM channels are on range 1.

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3/4.3 INSTRUMENTATION

BASES

3/4.3.1 REACTOR PROTECTION SYSTEM INSTRUMENTATION

The reactor protection system automatically initiates a reactor scram to:

- a. Preserve the integrity of the fuel cladding.
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The measurement of response time at the specified frequencies provides assurance that the protective functions associated with each channel are completed within the time limit assumed in the accident analysis. The RPS RESPONSE TIME acceptance criteria are included in plant Surveillance procedures. Only those functions with times assumed in the accident analysis are required to be response time tested.

As stated in Note * of Table 3.3.1-2, Neutron detectors are exempt from response time testing. In addition, for Functional Units 3 and 4, per Note the associated sensors are not required to be response time tested. For these

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BASES

3/4.3.1 REACTOR PROTECTION SYSTEM INSTRUMENTATION (Continued)

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Response time may be demonstrated by any series of sequential, overlapping or total channel test measurement, provided such tests demonstrate the total channel response time as defined. Sensor response time verification may be demonstrated by either (1) in place, onsite or offsite test measurements, or (2) utilizing replacement sensors with certified response times.

3/4.3.2 ISOLATION ACTUATION INSTRUMENTATION

This specification ensures the effectiveness of the instrumentation used to mitigate the consequences of accidents by prescribing the OPERABILITY trip setpoints and response times for isolation of the reactor systems. When necessary, one channel may be inoperable for brief intervals to conduct required surveillance. Both channels of each trip system for the main steam tunnel ventilation system differential temperature may be placed in an inoperable status for up to 4 hours for required reactor building ventilation system maintenance and testing and 12 hours due to loss of reactor building ventilation or for the required secondary containment Leak Rate test without placing the trip system in the tripped condition. This will allow for maintaining the reliability of the ventilation system and secondary containment. Specified surveillance intervals and surveillance and maintenance outage times have been determined in accordance with NEDC-30851P-A, Supplement 2, "Technical Specification Improvement Analyses for BWR Isolation Instrumentation Common to RPS and ECCS Instrumentation", March 1989, and with NEDC-31677P-A, "Technical Specification Improvement Analysis for BWR Isolation Actuation Instrumentation", July 1990. When a channel is placed in an inoperable status solely for performance of required surveillances, entry into LCO and required ACTIONS may be delayed, provided the associated function maintains primary containment isolation capability. Some of the trip settings may have tolerances explicitly stated where both the high and low values are critical and may have a substantial effect on safety. The setpoints of other instrumentation, where only the high or low end of the setting have a direct bearing on safety, are established at a level away from the normal operating range to prevent inadvertent actuation of the systems involved.

Except for the MSIVs, the safety analysis does not address individual sensor response times or the response times of the logic systems to which the sensors are connected. For A.C. operated valves, it is assumed that the A.C.

**ATTACHMENT C
SIGNIFICANT HAZARDS CONSIDERATION**

Summary of the Proposed Technical Specification Changes:

- a. The definition of Channel Calibration does not include an exemption for the calibration of thermocouple and resistance temperature detector (RTD) sensors, which can not be calibrated. 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 C
SIGNIFICANT HAZARDS CONSIDERATION**

Commonwealth Edison (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:
 - a. The change in the definition of a Channel Calibration is to make the wording more clear and to require an inplace qualitative assessment in place of the calibration of thermocouple and resistance temperature detector (RTD) sensors. The thermocouple and RTD sensors are not adjustable and are not subject to drift due to their design. The inplace qualitative assessments will assure proper functioning of the sensors, due to the nature of these sensors and the associated failure modes, and thus will verify that the sensors will be able to fulfill their intended function(s). Therefore the change to the definition will not change the probability or consequences of an accident previously evaluated.
 - b. Manual initiation of isolation actuation instrumentation trip systems for inboard and outboard valves is required to be operable per TS Table 3.3.2-1, Trip Functions B.1 and B.2, respectively. Trip Function B.2, outboard valves, lists valve group 7, TIP system isolation valves. Valve group 7 consists of an automatic inboard isolation valve for each TIP guide tube penetrating the primary containment (correctly listed under B.1), and a manual outboard isolation valve on each guide tube, that is an explosive squib valve. Each explosive squib valve is manually actuated with a keylock switch from the main control room per design. Each is a positive control backup upon failure of an inboard valve in the open position. The squib valves are not actuated from isolation actuation channel logic. This configuration meets the current design and licensing basis. Therefore, deletion of valve group 7 from TS Table 3.3.2-1 will not change the probability or consequences of an accident previously evaluated.

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- c. The proposed change to TS Table 3.3.6-1, Control Rod Withdrawal Block Instrumentation, deletes Note (e) from Trip Function 4.a, IRM detector-not-full-in rod block. This rod withdrawal block functions during Operational Conditions 2, Startup, and 5, Refuel, to assure that IRMs are operable during control rod withdrawal in these plant Operational Conditions. The rod block is not bypassed when the IRMs are on range 1. Thus Note (e) does not apply to this trip function and is being deleted. Therefore, the correction of this error will not change the probability or consequences of an accident previously evaluated.
 - d. The change to TS Bases 3/4.3.1 to correct a typographical error referencing TS Table 3.3.1-2, Note #, instead of Note ## is an administrative change and thus will not change the probability or consequences of an accident.
- 2) Create the possibility of a new or different kind of accident from any accident previously evaluated because:
- The changes to the definition of Channel Calibration and correction of the other miscellaneous errors in the TS and TS Bases will not create the possibility of a new or different kind of accident, because the changes will not affect the design or operation of any structure, system, or component in the plant
- 3) Involve a significant reduction in the margin of safety because:
- a. The definition of Channel Calibration is being changed to be like the definition in NUREG 1434, Standard Technical Specifications General Electric Plants, BWR/6, Revision 1. The primary changes involve requiring only an in-place qualitative assessment of thermocouple and RTD sensors. These sensors are not adjustable and not susceptible to setpoint drift. Thus the appropriate check of the sensors is a qualitative assessment only. The in-place qualitative assessment assures operability of the sensors. Therefore there is no reduction in the margin of safety.

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- b. The remaining miscellaneous changes are corrections due to errors in the TS. The corrections will make the associated TS consistent with the design and licensing basis of LaSalle or correct typographical errors. Therefore, there is no reduction in the margin of safety.

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 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 the acceptance criteria with respect to the system or component specified in the 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

Commonwealth Edison (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.