

Commonwealth Edison Company  
LaSalle Generating Station  
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**ComEd**

October 8, 1998

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

**Subject:** Submittal of Relief Request RV-10 for the Inservice  
Testing Program  
LaSalle County Nuclear Power Station, Unit 1  
Facility Operating License NPF-11  
NRC Docket No. 50-373

Commonwealth Edison Company (ComEd) has recently rescheduled the start date of the LaSalle County Nuclear Power Station (LaSalle), Unit 1 eighth refuel outage (L1R08) from September 25, 1999, to January 8, 2000. To comply with current commitments, four of the LaSalle, Unit 1 Main Steam safety/relief valves must be tested in accordance with ASME/ANSI OM-1987 (Part 1), "Requirements for Inservice Performance Testing of Nuclear Power Plant Pressure Relief Devices," requirements no later than December 12, 1999. Currently, there is a LaSalle, Unit 1 second planned outage (L1P02) scheduled to begin December 5, 1998, with a six day duration. Extending L1P02 or requiring an additional unit shutdown prior to L1R08 to perform the required testing would result in a hardship to ComEd in the form of lost generation capability without a compensating increase in the level of quality or safety. Therefore, in accordance with 10 CFR 50.55a(a)(3)(ii), ComEd requests in the attached relief request that the 24 month test frequency requirement of ASME/ANSI OM-1987 (Part 1) be extended to 26 months.

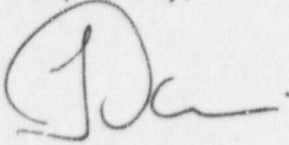
ComEd requests approval of this relief request by November 30, 1998, to preserve the integrity of the L1P02 schedule.

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

Respectfully,

A handwritten signature in black ink, appearing to read 'Fred R. Dacimo', with a large, stylized initial 'F'.

Fred R. Dacimo  
Site Vice President  
LaSalle County Station

Enclosure

cc: J. L. Caldwell, Acting NRC Region III Administrator  
M. P. Huber, NRC Senior Resident Inspector - LaSalle  
Office of Nuclear Facility Safety - IDNS

## Valve Relief Request - RV-10

(Rev. 0)

### Affected Components

EPN	Class	Cat.	Description
1B21-F013A	1	B/C	Main Steam Line Safety Relief Valve
1B21-F013B	1	B/C	Main Steam Line Safety Relief Valve
1B21-F013C	1	B/C	Main Steam Line Safety Relief Valve
1B21-F013D	1	B/C	Main Steam Line Safety Relief Valve
1B21-F013E	1	B/C	Main Steam Line Safety Relief Valve
1B21-F013F	1	B/C	Main Steam Line Safety Relief Valve
1B21-F013G	1	B/C	Main Steam Line Safety Relief Valve
1B21-F013H	1	B/C	Main Steam Line Safety Relief Valve
1B21-F013J	1	B/C	Main Steam Line Safety Relief Valve
1B21-F013K	1	B/C	Main Steam Line Safety Relief Valve
1B21-F013L	1	B/C	Main Steam Line Safety Relief Valve
1B21-F013M	1	B/C	Main Steam Line Safety Relief Valve
1B21-F013N	1	B/C	Main Steam Line Safety Relief Valve
1B21-F013P	1	B/C	Main Steam Line Safety Relief Valve
1B21-F013R	1	B/C	Main Steam Line Safety Relief Valve
1B21-F013S	1	B/C	Main Steam Line Safety Relief Valve
1B21-F013U	1	B/C	Main Steam Line Safety Relief Valve
1B21-F013V	1	B/C	Main Steam Line Safety Relief Valve

### Test Requirement

OM-1-1987, Section 1.3.3.1(b); all valves of each type and manufacture shall be tested within each subsequent 5 year period with a minimum of 20% of the valves tested within any 24 months.

### Basis for Relief

Current LaSalle Technical Specification Surveillance Requirement 3/4.4.2 (Bases) identifies that demonstration of safety/relief valve lift settings will occur only during shutdown and will be performed in accordance with the provisions of Specification 4.0.5.

The second ten year testing interval for LaSalle Station Inservice Testing (IST) Program is updated to the requirements of the ASME Code, Section XI, 1989 Edition. The 1989 Edition of Section XI requires overpressure relief devices to be tested in accordance with ASME/ANSI OM-1-1987. OM-1-1987 requires all Class 1 valves of each type and manufacturer to be tested within each subsequent five year period with a minimum of 20% of the valves tested within any 24 months. Main Steam safety/relief valves at LaSalle are all of the same

type and manufacturer. Per OM-1-1987 requirements Main Steam safety/relief valves are grouped together.

OM-1-1987 requires all valves in each ASME Class 1 test group to be tested within the initial and all subsequent five (5) year periods. Therefore, testing of Main Steam safety/relief valves 1B21-F013A, C, E, G, H, M, U, and V is required by March of 2001 since these valves were tested last in March 1996. All other Main Steam safety/relief valves were tested in December 1997. Additionally, Unit 1 was shutdown from September 1996 to August 1998.

Additionally, OM-1-1987 requires that a minimum of 20% of the valves of each type and manufacturer be tested within any 24 month period. Main Steam safety/relief valves 1B21-F013B, D, F, J, K, L, N, P, R, and S were last tested December 12, 1997. To comply with the OM-1-1987 24 month frequency, ComEd must test at least 4 Main Steam safety/relief valves prior to December 12, 1999. The next LaSalle, Unit 1 refuel outage (L1R08) is currently scheduled to begin on January 8, 2000. In this case, OM-1-1987 is more restrictive than the applicable refueling outage schedule. Currently, there is a LaSalle, Unit 1 planned outage (L1P02) scheduled to begin on December 5, 1998, with a six day duration. Extending L1P02 or requiring an additional unit shutdown prior to L1R08 to perform the required testing would result in a hardship to ComEd.

Therefore, relief is requested to the 24 month test frequency requirement of OM-1-1987 to 26 months, as these tests would result in hardship without a compensating increase in quality or safety. To facilitate maintenance and testing activities, shielding is required to be installed to reduce personnel exposure. Personnel radiation exposure for safety/relief valve removal and replacement would result in exposures of approximately 1.0 to 1.2 man-rem per valve. Removal and replacement of Main Steam safety/relief valves is estimated to require 72 hours per valve. Per OM-1-1987 requirements, when satisfying testing requirements by installing a partial complement of pretested valves, all valves removed must be tested prior to plant startup. Therefore, an additional 4 to 5 days of critical path time would be added to L1P02 to facilitate testing of removed valves and could result in a delay in the return to power operation.

As-found SRV set pressure testing has been very consistent since LaSalle, Units 1 and 2, fifth refuel outages (L1R05 and L2R05, respectively) as evidenced by the fact that 68 tests have been conducted with only 4 as-found set pressure failures. There have been no failures since the LaSalle, Unit 2 sixth refuel outage (L2R06) at which time the testing requirements were changed in Technical Specification 3/4.4.2 to allow as-found lift settings to comply with OM-1-1987 requirements of  $\pm 3\%$  and as-left  $\pm 1\%$ . Previously Technical Specifications required as-found settings to be  $\pm 1\%$ .

The subject valves were installed in March 1996 and have seen limited service. Unit 1 startup following valve installation occurred in April 1996. Unit 1 was subsequently shutdown in September 1996 and did not resume operation until August 1998. Assuming the plant runs continuously until January 8, 2000, the valves will have experienced approximately 22 months of service.

#### **PROPOSED ALTERNATIVE**

The four (4) LaSalle, Unit 1 Main Steam safety/relief valves deferred will be tested and replaced with pretested valves during L1R08. This alternative will provide a schedular relief to extend the 24 month test frequency requirement to 26 months in order to schedule the testing consistent with the L1R08 schedule.