



**Commonwealth Edison**

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Address Reply to: Post Office Box 767  
Chicago, Illinois 60690 - 0767

September 9, 1988

U.S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, DC 20555

Subject: LaSalle County Station Units 1 and 2  
Application for Amendment to Facility  
Operating Licenses NPF-11 and NPF-18  
Appendix A, Technical Specifications  
NRC Docket Nos. 50-373 and 50-374

Gentlemen:

Pursuant to 10 CFR 50.90, Commonwealth Edison is hereby applying for an amendment to Facility Operating Licenses NPF-11 and NPF-18, Appendix A, Technical Specifications. The purpose of this amendment is to provide flexibility to align snubber inspection intervals with refueling outage when no failures are encountered.

Attachment A contains background information and justification for the proposed change. Attachment B contains the proposed change to Technical Specifications. The proposed change has been reviewed and approved by both Onsite and Offsite Review in accordance with Commonwealth Edison Company procedures. This amendment request has been evaluated in accordance with 10 CFR 50.92(c) and it was determined that no significant hazards consideration exists. That evaluation is documented in Attachment C.

Commonwealth Edison is notifying the State of Illinois of our application for this amendment by transmitting a copy of this letter and its attachments to the designated State Official.

In accordance with 10 CFR 170, a fee remittance in the amount of \$150.00 is enclosed.

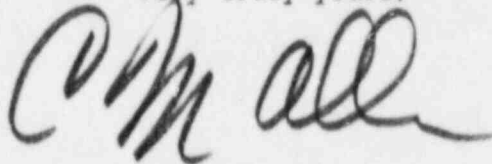
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September 9, 1988

Please direct any questions you may have regarding this matter to this office.

Very truly yours,



C. M. Allen  
Nuclear Licensing Administrator

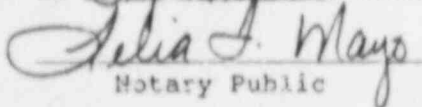
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Enclosure

cc: Attachments (A): Background and Discussion  
(B): Proposed Technical Specification Change  
(C): Evaluation of Significant Hazards Consideration

cc: LaSalle Resident Inspector  
P. Shemanski - NRR  
M. C. Parker - IDNS  
NRC Regional Administrator, RIII

SUBSCRIBED AND SWORN to  
before me this 9<sup>th</sup> day  
of September, 1988

  
Notary Public

## ATTACHMENT A

### TECHNICAL SPECIFICATION CHANGE REQUEST

#### LASALLE COUNTY STATION UNITS 1 AND 2

### BACKGROUND AND DISCUSSION

#### BACKGROUND

Visual inspection of snubbers is performed to establish a level of confidence in snubber performance for the next operating cycle. The current inspection period is based upon the number of failures found during the last inspection. This period is windowed to allow sufficient duration such that the surveillance has minimal impact on the operation of the plant.

The extended side of the window assures that excessive operating time does not occur between the inspections resulting in a higher probability of failures. The early side of the window serves two purposes: (1) To prevent a licensee from performing several surveillances in a short period which would allow going to the 18 month interval without the snubbers experiencing any appreciable service life; (2) To assure that snubbers have gone through sufficient service life for degradation to become observable.

#### DISCUSSION

Approval of this change would modify LaSalle County Station Technical Specification requirement 4.7.9.b "Subsequent Visual Inspection Period" for zero failures from 18 months (+25%) to 18 months (-50% +25). This would allow adequate flexibility to bring the snubber surveillance date back into conformance with the refueling outage sequence. This will also prevent a shutdown for the sole purpose of performing snubber inspections which would have been required for Unit 1 this cycle.

In June of 1987, snubber visual inspections were performed on LaSalle Unit 1 and no failures were found. The next inspection interval was set at 18 months +25% making the surveillance due in December of 1988 with an early start date (-25%) near the end of July and a critical date (+25%) of April 1989. The Unit 1 second refueling outage was started in March 1988 after an 11 month run and ended in the beginning of July 1988. This was short of the early start date for the visual inspection. The next scheduled outage is October 1989. This could have resulted in a need to shutdown mid-cycle to perform the surveillance. Fortunately unit startup was delayed and the surveillance was performed in late July under the early window.

The station held discussions with Horace Shaw of the NRC and Commonwealth Edison Licensing Department regarding the duration of service time between inspections. Regarding the 18 month inspection period, it was felt that nine months was sufficient operating time to sufficiently challenge the snubbers yet still provide the station sufficient flexibility to accomodate short operating cycles. Nine months, while being conservative, is no shorter time between inspection periods than if two snubber failures had occurred at the last inspection. Based on this discussion, the interval for the 18 month interval would be specified as +25% or -50%.

ATTACHMENT B

TECHNICAL SPECIFICATION CHANGE REQUEST

LASALLE COUNTY STATION UNITS 1 AND 2

PROPOSED CHANGES TO APPENDIX A

REVISED PAGES:

NPF-11

3/4 7-27

NPF-18

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