



Commonwealth Edison

One First National Plaza, Chicago, Illinois
Address Reply to Post Office Box 767
Chicago, Illinois 60690

March 10, 1986

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Subject: LaSalle County Station Units 1 and 2
Proposed Amendment to Technical
Specification for Facility Operating
License NPF-11 and NPF-18
Appendix B, Environmental Protection Plan
NRC Docket Nos. 50-373 and 50-374

Dear Mr. Denton:

Pursuant to 10 CFR 50.90, Commonwealth Edison proposes to amend Appendix A, Technical Specification, to Facility Operating License NPF-11 and NPF-18. This amendment change is being submitted for your staff's review and approval.

The proposed amendment requests approval to remove two of the reporting requirements contained in NPF-11 and NPF-18, Appendix B, Environmental Protection Plan. The request is to first remove redundant reporting of NPDES violations to both NRC and the State of Illinois, and second to terminate the fog and ice monitoring program.

Attachment A provides background and discussion. The proposed change is enclosed in Attachment B. The attached change has received both On-Site and Off-Site review and approval. We have reviewed this amendment request and find that no significant hazards consideration exists. Our review is documented in Attachment C.

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

In accordance with the requirements of 10 CFR 50.170, a fee remittance in the amount of \$150.00 is enclosed.

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Rec'd w/Check \$150.00

March 10, 1986

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

Three (3) signed originals and thirty-seven (37) copies of this transmittal and its attachments are provided for your use.

Very truly yours,



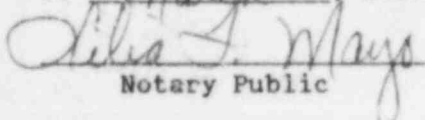
C. M. Allen
Nuclear Licensing Administrator

lm

Attachments A: Background and Discussion
B: Technical Specification Changes to NPF-11 and NPF-18
C: Evaluation of Significant Hazard. Consideration

cc: Region III Inspector - LSCS
A. Bournia - NRR
M. Parker - State of Ill.

SUBSCRIBED AND SWORN to
before me this 10th day
of March, 1986



Notary Public

ATTACHMENT A

TECHNICAL SPECIFICATION CHANGE REQUEST
LASALLE COUNTY STATION UNITS 1 and 2

SUBJECT: Revision of Appendix B (EPP) to NPF-11 and NPF-18

REFERENCES (a): EPP Annual Operating Report dated March 27, 1985

(b): Results of Foliar Survey of the LaSalle County
Generating Station for Rime Ice Deposition
Damage by Barry J. Jacobsen, PhD.

BACKGROUND: LaSalle County Station Operating Licenses NPF-11 and NPF-18, Appendix B, Environmental Protection Plan, is provided to ensure that the plant is operated in an environmentally acceptable manner. Two revisions to the plan are included in this request. The areas of the plan which are affected are: 1) Violations of the NPDES permit or State Certification require redundant reporting to the NRC per Section 3.2. 2) Monitoring Fog and Ice due to the Cooling Pond to determine the environmental impact is required by Section 4.2.2.

DISCUSSION: In the area of environmental protection the NRC relies on the Illinois Environmental Protection Agency for regulation. Since the Illinois EPA receives NPDES noncompliance reports, no report should be required to the NRC. Therefore, this proposed amendment request deletes the requirement to provide the NRC with copies of these reports.

The second proposed revision is the termination of the fog and ice monitoring program, Sections 2.2 and 4.2.2. The basis for the monitoring program is the concern expressed in the LaSalle County Station Final Environmental Statement (FES) for the occurrence of heavy fog on the state, county and township roads that border the site and the formation of rime ice on nearby vegetation (Section 3e of Summary and Conclusions). This concern largely stems from the experience at the Dresden Station cooling pond as discussed in FES Section 5.4.1.2. The guidelines for the specific EPP fog and ice monitoring program and its duration is found in FES Section 6.3.1.

The justification for terminating the fog and ice monitoring program are:

- 1) The requirement for a 12 month period of one unit operation and a 12 month period of two unit operation have been fulfilled.
- 2) The results of the monitoring programs as summarized in the LaSalle County Station EPP Annual Operating Report for 1984, which was submitted to Region III of the NRC on March 27, 1985 (Reference (a)), shows that the offsite effects of fog and rime ice occurrence have been minimal. The summary for 4.2.2 also included the request for termination of the program based on the results of five years (two baseline, three operational) of the fog and ice monitoring program.
- 3) The monitoring reports for the first two quarters of 1985 sustain the previous findings. Also the consulting plant pathologist's report of the results of the foliar survey for rime ice deposition damage for the 1983-1984 and 1984-1985 winters concluded that rime icing was not a factor in vegetation injury in or around LaSalle County Station. (Reference (b))

This proposed change to the Environmental Protection Plan, Appendix B to licenses NPF-11 and NPF-18 does not have any environmental impact in that no limits are effected. The Illinois EPA will still be notified as before.

The proposed changes are included as Attachment A.