



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
Regulatory Guide 1.97 Revision 2
Interim Response
NRC Docket Nos. 50-373 and 50-374

- References (a): December 13, 1984 letter from A. Schwencer to D.L. Farrar containing interim report on Reg. Guide 1.97, Revision 2.
- (b): February 22, 1985 letter from G.L. Alexander to H.R. Denton on LaSalle County Station's response to interim report.
- (c): September 27, 1985 letter from H.L. Massin to H.R. Denton concerning reclassification of Comsip Analyzers.

Dear Mr. Denton:

Commonwealth Edison has reviewed the recommended Neutron Flux Monitoring System classification per Reg. Guide 1.97 Revision 2. The Reg. Guide calls for the instrumentation monitoring neutron flux to be classified as Category I with a range of 10^{-6} to 100% power. The current LaSalle equipment (with the exception of the drives, Category III) is classified as Category II with a range of 10^{-5} to 100% full power.

The NRC issued their interim report for CECO's response to R.G. 1.97, Revision 2 dated December 13, 1984 (Reference (a)). This transmittal was responded to on February 22, 1985 (Reference (b)). Since then CECO has re-evaluated the NRC's position on the categorization of neutron monitoring instrumentation.

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The NRC consultant (EG&G Idaho) based their discussion in the December 13, 1984 transmittal on the Standard Review Plan Section 15.4.6, "Chemical and Volume Control System Malfunction that Results in a Decrease in Boron Concentration in the Reactor Coolant (PWR)." The position presented in the transmittal is not applicable to LaSalle County Station - a BWR 5, with a Mark II containment.

It is CECO's position that the installed neutron flux monitors meet the requirements of post accident monitoring. The position is consistent with the LaSalle Emergency Operating Procedures (EOP's). The crucial parameter to be monitored in the post LOCA sceneric is not the approach to critically but the addition of heat to the system. The heat addition is monitored via temperature or pressure indicators. The LaSalle EOP's do not require the operator to monitor neutron flux in the post LOCA procedures.

The neutron monitors meet the requirements for effective usage in an ATWS condition. An ATWS event does not generate a harsh environment for the neutron monitoring instrumentation. The LaSalle EOP's do require the operators to monitor neutron flux in an ATWS scenerio.

Unresolved Issues

- (1) In a letter to H.R. Denton dated September 27, 1985 (Reference (c)), CECO reclassified the comsip hydrogen-oxygen analyzers as Category III instrument monitoring a Type D variable. Upon further review of this classification, a technical basis for the Category III classification will not be developed. Four separate tasks are required in order to yield a configuration for the H₂ - O₂ analyzers which will meet the Environmental Qualification requirements as prescribed in Reg. Guide 1.97. These four tasks are as follows:

1. Up-grade the sample pump diaphragm
2. Relocate the potentiometers used for calibration
3. Up-grade the catalyst
4. Replace the heat tracing system with a qualified system

Upon completion of these four tasks, the Comsip analyzers will be classified as Category I, monitoring a Type A variable. These tasks are currently scheduled to be completed prior to start-up from each unit's second refueling outage.

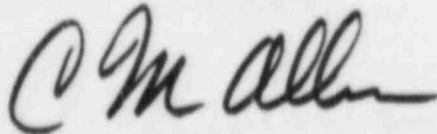
March 10, 1986

- (2) The RHR heat exchanger service water outlet temperature indication (1 (2) E12-N005 A/B) and RHR heat exchanger outlet temperature indication (1 (2) E12-N027 A/B) are not qualified. These devices are not class IE and do not perform any automatic function. They could not prevent a safety related function from occurring. Nor do they provide primary indication for decision making during accident conditions (EOP's). Environmentally qualified indications (suppression pool temperature, reactor pressure) are available during accident conditions to provide the operator with sufficient information to ensure proper indication of system performance.

Commonwealth Edison has, however, committed to installing fully qualified Pyco temperature indicating devices in these applications. Therefore, the temperature indications will be fully qualified in accordance with the same schedule as qualification of the Comsip analyzers.

One signed original and fifteen (15) copies of this letter are provided for your use. Please address any further questions you may have regarding this matter to this office.

Sincerely,



C. M. Allen
Nuclear Licensing Administrator

lm

cc: A. Bournia
NRC Resident Inspector - LSCS



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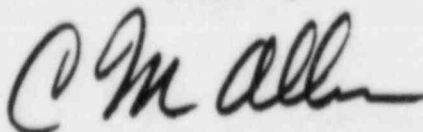
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