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Docket Nos. 50-373 and 50-374

Mr. L. D. Butterfield, Jr. Nuclear Licensing Manager Commonwealth Edison Company Post Office Box 767 Chicago, Illinois 60690

Dear Mr. Butterfield:

SUBJECT: RISK BASED EVALUATION OF TECHNICAL SPECIFICATION PROBLEMS AT

THE LASALLE COUNTY STATION, EPRI RESEARCH PROJECT 2142-2

TAC NOS. 66059/66060

By letter dated July 10, 1987, Commonwealth Edison submitted a proposed Technical Specification Amendment to allow removal of the main steam line isolation function from Main Steam Tunnel (MST) temperature and differential temperature sensors. The alarm function from the sensors would be retained to provide early indication of potential steam leaks. The analysis used to determine the effect on plant safety of removing the ambient and differential temperature trips from the Primary Containment Isolation System Group I isolation logic is an EPRI risk-based evaluation.

Even though the EPRI risk analysis concludes that the reliability of the MSIV's to close in response to a steam line break outside the containment is not significantly compromised by removal of the MSI temperature trip sensors as part of the trip logic, the regulatory practice is that PRA may be used to supplement a deterministic analysis; but may not be used as the sole basis for justifying changes. The staff has reviewed this proposed amendment and finds that the risk-based evaluation alone, is not acceptable as the sole basis for approving removal of the MSI ambient and differential temperature trips. You should revise your submittal to audress the Updated Final Safety Analysis Report regulatory requirements and design basis and logic for the leak detection system. The supplemental analysis should focus on the effect on plant safety of removing the ambient and differential trips from the Primary Containment Isolation System Group I isolation logic and any compensatory measures that would be required to support their removal.

8802110177 880208 PDR ADOCK 05000373 PDR PDR If there are any questions concerning this information, please contact Paul Shemanski, Project Manager at (301) 492-3017.

Sincerely,

Original Signed by/

Daniel R. Muller, Director Project Directorate III-2 Division of Reactor Projects - III, IV, V and Special Projects

cc: See next page

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Mr. L. D. Butterfield, Jr. Commonwealth Edison Company

cc: Philip P. Steptoe, Esq. Suite 5200 Three First National Plaza Chicago, Illinois 60602

Assistant Attorney General 100 West Randolph Street Chicago, Illinois 60601

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Chairman LaSalle County Board of Supervisors LaSalle County Courthouse Ottawa, Illinois 61350

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Mr. Gary N. Wright, Manager Nuclear Facility Safety Illinois Department of Nuclear Safety 1035 Outer Park Drive, 5th Floor Springfield, Illinois 62704

Regional Administrator, Region III U.S. Nuclear Regulatory Commission 799 Roosevelt Road Glen Ellyn, Illinois 60137 LaSalle County Nuclear Power Station Units 1 and 2

John W. McCaffrey Chief, Public Utilities Division 160 North LaSalle Street, Room 900 Chicago, Illinois 60601