

ATTACHMENT B
PROPOSED CHANGES TO
THE TECHNICAL SPECIFICATIONS FOR
OPERATING LICENSES NPF-11 AND NPF-18

REVISED PAGES:

<u>NPF-11</u>	<u>NPF-18</u>
3/4 3-11	3/4 3-11
3/4 3-14(a)	3/4 3-14(a)
3/4 3-15	3/4 3-15
3/4 3-18	3/4 3-18
3/4 3-20	3/4 3-20

8707150482 870710
PDR ADDCK 05000373
P PDR

TABLE 3.3.2-1

ISOLATION ACTUATION INSTRUMENTATION

TRIP FUNCTION	VALVE GROUPS OPERATED BY SIGNAL (a)	MINIMUM OPERABLE CHANNELS PER TRIP SYSTEM (b)	APPLICABLE OPERATIONAL CONDITION	ACTION
A. AUTOMATIC INITIATION				
1. PRIMARY CONTAINMENT ISOLATION				
a. Reactor Vessel Water Level (1) Low, Level 3	7	2	1, 2, 3	20
(2) Low Low, Level 2	2, 3	2	1, 2, 3	20
(3) Low Low Low, Level 1	1, 10	2	1, 2, 3	20
b. Drywell Pressure - High	2, 7, 10	2	1, 2, 3	20
c. Main Steam Line				
1) Radiation - High	1	2	1, 2, 3	21
2) Pressure - Low	3	2	1, 2, 3	22
3) Flow - High	1	2	1	23
		2/line(d)	1, 2, 3	21
d. Main Steam Line Tunnel Temperature - High	1	2	1, 2, 3	21
e. Main Steam Line Tunnel Δ Temperature - High	1	2	1(i), 2(i), 3(i)	21
d. f. Condenser Vacuum - Low	1	2	1, 2*, 3*	21
2. SECONDARY CONTAINMENT ISOLATION				
a. Reactor Building Vent Exhaust Plenum Radiation - High	4(c)(e)	2	1, 2, 3 and **	24
b. Drywell Pressure - High	4(c)(e)	2	1, 2, 3	24
c. Reactor Vessel Water Level - Low Low, Level 2	4(c)(e)	2	1, 2, 3, and #	24
d. Fuel Pool Vent Exhaust Radiation - High	4(c)(e)	2	1, 2, 3, and **	24

TABLE 3.3.2-1 (Continued)

NOTES (Continued)

- (g) Requires RCIC steam supply pressure-low coincident with drywell pressure-high.
- (h) Manual initiation isolates 1E51-F008 only and only with a coincident reactor vessel water level-low, level 2, signal.
- (i) Both channels of each trip system may be placed in an inoperable status for up to 4 hours for required reactor building ventilation filter change and damper cycling without placing the trip system in the tripped condition provided that the ambient temperature channels in the same trip systems are operable.

TABLE 3.3.2-2

ISOLATION ACTUATION INSTRUMENTATION SETPOINTS

TRIP FUNCTION	TRIP SETPOINT	ALLOWABLE VALUE
A. AUTOMATIC INITIATION		
1. PRIMARY CONTAINMENT ISOLATION		
a. Reactor Vessel Water Level		
1) Low, Level 3	> 12.5 inches*	> 11.0 inches*
2) Low Low, Level 2	> -50 inches*	> -57 inches*
3) Low Low Low, Level 1	> -129 inches*	> -136 inches*
b. Drywell Pressure - High	< 1.69 psig	< 1.89 psig
c. Main Steam Line		
1) Radiation - High	< 3.0 x full power background	< 3.6 x full background
2) Pressure - Low	> 854 psig	> 834 psig
3) Flow - High	< 111 psid	< 116 psid
d. Main Steam Line Tunnel Temperature - High	< 140°F	< 146°F
e. Main Steam Line Tunnel Δ Temperature - High	< 36°F	< 42°F
d.f. Condenser Vacuum - Low	> 7 inches Hg vacuum	> 5.5 inches Hg vacuum
2. SECONDARY CONTAINMENT ISOLATION		
a. Reactor Building Vent Exhaust Plenum Radiation - High	< 10 mr/hr	< 15 mr/hr
b. Drywell Pressure - High	< 1.69 psig	< 1.89 psig
c. Reactor Vessel Water Level - Low Low, Level 2	> -50 inches*	> -57 inches*
d. Fuel Pool Vent Exhaust Radiation - High	< 10 mr/hr	< 15 mr/hr
3. REACTOR WATER CLEANUP SYSTEM ISOLATION		
a. Δ Flow - High	< 70 gpm	< 87.5 gpm
b. Heat Exchanger Area Temperature - High	< 181°F	< 187°F
c. Heat Exchanger Area Ventilation ΔT - High	< 85°F	< 91°F
d. SLCS Initiation	NA	NA
e. Reactor Vessel Water Level - Low Low, Level 2	> -50 inches*	> -57 inches*

TABLE 3.3.2-3

ISOLATION SYSTEM INSTRUMENTATION RESPONSE TIME

<u>TRIP FUNCTION</u>	<u>RESPONSE TIME (Seconds)#</u>
A. <u>AUTOMATIC INITIATION</u>	
1. <u>PRIMARY CONTAINMENT ISOLATION</u>	
a. Reactor Vessel Water Level	
1) Low, Level 3	NA
2) Low Low, Level 2	$\leq 13^{(a)}$
3) Low Low Low, Level 1	$\leq 1.0^*/\leq 13^{(a)**}$
b. Drywell Pressure - High	$\leq 13^{(a)}$
c. Main Steam Line	
1) Radiation - High ^(b)	$\leq 1.0^*/\leq 13^{(a)**}$
2) Pressure - Low	$\leq 2.0^*/\leq 13^{(a)**}$
3) Flow - High	$\leq 0.5^*/\leq 13^{(a)**}$
d. Main Steam Line Tunnel Temperature - High	NA
d. e. Condenser Vacuum - Low	NA
f. Main Steam Line Tunnel Δ Temperature - High	NA
2. <u>SECONDARY CONTAINMENT ISOLATION</u>	
a. Reactor Building Vent Exhaust Plenum	
Radiation - High ^(b)	$\leq 13^{(a)}$
b. Drywell Pressure - High	$\leq 13^{(a)}$
c. Reactor Vessel Water Level - Low, Level 2	$\leq 13^{(a)}$
d. Fuel Pool Vent Exhaust Radiation - High ^(b)	$\leq 13^{(a)}$
3. <u>REACTOR WATER CLEANUP SYSTEM ISOLATION</u>	
a. Δ Flow - High	$\leq 13^{(a)**}$
b. Heat Exchanger Area Temperature - High	NA
c. Heat Exchanger Area Ventilation ΔT -High	NA
d. SLCS Initiation	NA
e. Reactor Vessel Water Level - Low Low, Level 2	$\leq 13^{(a)}$
4. <u>REACTOR CORE ISOLATION COOLING SYSTEM ISOLATION</u>	
a. RCIC Steam Line Flow - High	$\leq 13^{(a)***}$
b. RCIC Steam Supply Pressure - Low	$\leq 13^{(a)}$
c. RCIC Turbine Exhaust Diaphragm Pressure - High	NA
d. RCIC Equipment Room Temperature - High	NA
e. RCIC Steam Line Tunnel Temperature - High	NA
f. RCIC Steam Line Tunnel Δ Temperature - High	NA
g. Drywell Pressure - High	NA
h. RCIC Equipment Room Δ Temperature - High	NA
5. <u>RHR SYSTEM STEAM CONDENSING MODE ISOLATION</u>	
a. RHR Equipment Area Δ Temperature - High	NA
b. RHR Area Cooler Temperature - High	NA
c. RHR Heat Exchanger Steam Supply Flow High	NA

TABLE 4.3.2.1-1
ISOLATION ACTUATION INSTRUMENTATION SURVEILLANCE REQUIREMENTS

TRIP FUNCTION	CHANNEL CHECK	CHANNEL FUNCTIONAL TEST	CHANNEL CALIBRATION	OPERATIONAL CONDITIONS FOR WHICH SURVEILLANCE REQUIRED
A. AUTOMATIC INITIATION				
1. PRIMARY CONTAINMENT ISOLATION				
a. Reactor Vessel Water Level				
1) Low, Level 3	NA	M	R	1, 2, 3
2) Low Low, Level 2	NA	M	R	1, 2, 3
3) Low Low Low, Level 1	NA	M	R	1, 2, 3
b. Drywell Pressure - High	NA	M	Q	1, 2, 3
c. Main Steam Line				
1) Radiation - High	S	M	R	1, 2, 3
2) Pressure - Low	NA	M	Q	1
3) Flow - High	NA	M	R	1, 2, 3
d. Main Steam Line Tunnel				
Temperature - High	NA	M	R	1, 2, 3
e. Condenser Vacuum - Low	NA	M	Q	1, 2, 3*
f. Main Steam Line Tunnel				
Δ Temperature - High	NA	M	R	1, 2, 3
2. SECONDARY CONTAINMENT ISOLATION				
a. Reactor Building Vent Exhaust				
Plenum Radiation - High	S	M	R	1, 2, 3 and **
b. Drywell Pressure - High	NA	M	Q	1, 2, 3
c. Reactor Vessel Water Level - Low Low, Level 2	NA	M	R	1, 2, 3, and #
d. Fuel Pool Vent Exhaust				
Radiation - High	S	M	R	1, 2, 3 and **
3. REACTOR WATER CLEANUP SYSTEM ISOLATION				
a. Δ Flow - High	S	M	R	1, 2, 3
b. Heat Exchanger Area Temperature - High	NA	M	Q	1, 2, 3
c. Heat Exchanger Area Ventilation ΔI - High	NA	M	Q	1, 2, 3
d. SLCS Initiation	NA	R	NA	1, 2, 3
e. Reactor Vessel Water Level - Low Low, level 2	NA	M	R	1, 2, 3

TABLE 3.3.2-1

ISOLATION ACTUATION INSTRUMENTATION

TRIP FUNCTION	VALVE GROUPS OPERATED BY SIGNAL (a)	MINIMUM OPERABLE CHANNELS PER TRIP SYSTEM (b)	APPLICABLE OPERATIONAL CONDITION	ACTION
A. AUTOMATIC INITIATION				
1. PRIMARY CONTAINMENT ISOLATION				
a. Reactor Vessel Water Level (1) Low, Level 3	7	2	1, 2, 3	20
(2) Low Low, Level 2	2, 3	2	1, 2, 3	20
(3) Low Low Low, Level 1	1, 10	2	1, 2, 3	20
b. Drywell Pressure - High	2, 7, 10	2	1, 2, 3	20
c. Main Steam Line				
1) Radiation - High	1	2	1, 2, 3	21
2) Pressure - Low	3	2	1, 2, 3	22
3) Flow - High	1	2	1	23
		2/line (d)	1, 2, 3	21
d. Main Steam Line Tunnel Temperature - High	1	2	1, 2, 3	21
e. Main Steam Line Tunnel Δ Temperature - High	1	2	1(i), 2(i), 3(i)	21
d.X Condenser Vacuum - Low	1	2	1, 2*, 3*	21
2. SECONDARY CONTAINMENT ISOLATION				
a. Reactor Building Vent Exhaust Plenum Radiation - High	4(c)(e)	2	1, 2, 3 and **	24
b. Drywell Pressure - High	4(c)(e)	2	1, 2, 3	24
c. Reactor Vessel Water Level - Low Low, Level 2	4(c)(e)	2	1, 2, 3, and #	24
d. Fuel Pool Vent Exhaust Radiation - High	4(c)(e)	2	1, 2, 3, and **	24

- (1) Both channels of each trip system may be placed in an inoperable status for up to 4 hours for required reactor building ventilation filter change and damper cycling without placing the trip system in the tripped condition provided that the ambient temperature channels in the same trip systems are OPERABLE.

TABLE 3.3.2-2

ISOLATION ACTUATION INSTRUMENTATION SETPOINTS

TRIP FUNCTION	TRIP SETPOINT	ALLOWABLE VALUE
A. AUTOMATIC INITIATION		
1. PRIMARY CONTAINMENT ISOLATION		
a. Reactor Vessel Water Level		
1) Low, Level 3	> 12.5 inches*	> 11.0 inches*
2) Low Low, Level 2	> -50 inches*	> -57 inches*
3) Low Low Low, Level 1	> -129 inches*	> -136 inches*
b. Drywell Pressure - High	< 1.69 psig	< 1.89 psig
c. Main Steam Line		
1) Radiation - High	< 3.0 x full power background	< 3.6 x full background
2) Pressure - Low	> 854 psig	> 834 psig
3) Flow - High	< 111 psid	< 116 psid
d. Main Steam Line Tunnel		
Temperature - High	< 140°F	< 146°F
e. Main Steam Line Tunnel		
A Temperature - High	< 36°F	< 42°F
Condenser Vacuum - Low	> 7 inches Hg vacuum	> 5.5 inches Hg vacuum
2. SECONDARY CONTAINMENT ISOLATION		
a. Reactor Building Vent Exhaust		
Plenum Radiation - High	< 10 mr/h	< 15 mr/h
b. Drywell Pressure - High	< 1.69 psig	< 1.89 psig
c. Reactor Vessel Water Level - Low Low, Level 2	> -50 inches*	> -57 inches*
d. Fuel Pool Vent Exhaust		
Radiation - High	< 10 mr/h	< 15 mr/h
3. REACTOR WATER CLEANUP SYSTEM ISOLATION		
a. ΔFlow - High	< 70 gpm	< 87.5 gpm
b. Heat Exchanger Area Temperature - High	< 181°F	< 187°F
c. Heat Exchanger Area Ventilation ΔT - High	< 85°	< 91°F
d. SICCS Initiation	N.A.	N.A.
e. Reactor Vessel Water Level - Low Low, Level 2	> -50 inches*	> -57 inches*

TABLE 3.3.2-3

ISOLATION SYSTEM INSTRUMENTATION RESPONSE TIME

<u>TRIP FUNCTION</u>	<u>RESPONSE TIME (Seconds)#</u>
<u>A. AUTOMATIC INITIATION</u>	
<u>1. PRIMARY CONTAINMENT ISOLATION</u>	
a. Reactor Vessel Water Level	
1) Low, Level 3	N.A.
2) Low Low, Level 2	<13(a)
3) Low Low Low, Level 1	<1.0*/<13.0(a)**
b. Drywell Pressure - High	<13(a)
c. Main Steam Line	
1) Radiation - High(b)	<1.0*/<13(a)**
2) Pressure - Low	<2.0*/<13(a)**
3) Flow - High	<0.5*/<13(a)**
d. Main Steam Line Tunnel Temperature - High	N.A.
e. Condenser Vacuum - Low	N.A.
f. Main Steam Line Tunnel Δ Temperature - High	N.A.
<u>2. SECONDARY CONTAINMENT ISOLATION</u>	
a. Reactor Building Vent Exhaust Plenum	
Radiation - High(b)	<13(a)
b. Drywell Pressure - High	<13(a)
c. Reactor Vessel Water Level - Low, Level 2	<13(a)
d. Fuel Pool Vent Exhaust Radiation - High(b)	<13(a)
<u>3. REACTOR WATER CLEANUP SYSTEM ISOLATION</u>	
a. Δ Flow - High	<13(a)##
b. Heat Exchanger Area Temperature - High	N.A.
c. Heat Exchanger Area Ventilation ΔT-High	N.A.
d. SLCS Initiation	N.A.
e. Reactor Vessel Water Level - Low Low, Level 2	<13(a)
<u>4. REACTOR CORE ISOLATION COOLING SYSTEM ISOLATION</u>	
a. RCIC Steam Line Flow - High	<13(a)###
b. RCIC Steam Supply Pressure - Low	<13(a)
c. RCIC Turbine Exhaust Diaphragm Pressure - High	N.A.
d. RCIC Equipment Room Temperature - High	N.A.
e. RCIC Steam Line Tunnel Temperature - High	N.A.
f. RCIC Steam Line Tunnel Δ Temperature - High	N.A.
g. Drywell Pressure - High	N.A.
h. RCIC Equipment Room Δ Temperature - High	N.A.
<u>5. RHR SYSTEM STEAM CONDENSING MODE ISOLATION</u>	
a. RHR Equipment Area Δ Temperature - High	N.A.
b. RHR Area Cooler Temperature - High	N.A.
c. RHR Heat Exchanger Steam Supply Flow High	N.A.

TABLE 4.3.2.1-1

ISOLATION ACTUATION INSTRUMENTATION SURVEILLANCE REQUIREMENTS

TRIP FUNCTION	CHANNEL CHECK	CHANNEL FUNCTIONAL TEST	CHANNEL CALIBRATION	OPERATIONAL CONDITIONS FOR WHICH SURVEILLANCE REQUIRED
A. AUTOMATIC INITIATION				
1. PRIMARY CONTAINMENT ISOLATION				
a. Reactor Vessel Water Level				
1) Low, Level 3	NA	M	R	1, 2, 3
2) Low Low, Level 2	NA	M	R	1, 2, 3
3) Low Low Low, Level 1	NA	M	R	1, 2, 3
b. Drywell Pressure - High	NA	M	Q	1, 2, 3
c. Main Steam Line				
1) Radiation - High	S	M	R	1, 2, 3
2) Pressure - Low	NA	M	Q	1
3) Flow - High	NA	M	R	1, 2, 3
d. Main Steam Line Tunnel				
Temperature - High	NA	M	R	1, 2, 3
Condenser Vacuum - Low	NA	M	Q	1, 2*, 3*
e. Main Steam Line Tunnel				
Δ Temperature - High	NA	M	R	1, 2, 3
2. SECONDARY CONTAINMENT ISOLATION				
a. Reactor Building Vent Exhaust				
Plenum Radiation - High	S	M	R	1, 2, 3 and **
Drywell Pressure - High	NA	M	Q	1, 2, 3
b. Reactor Vessel Water				
Level - Low Low, Level 2	NA	N	R	1, 2, 3, and #
c. Fuel Pool Vent Exhaust				
Radiation - High	S	M	R	1, 2, 3 and **
3. REACTOR WATER CLEANUP SYSTEM ISOLATION				
a. Δ Flow - High	S	M	R	1, 2, 3
b. Heat Exchanger Area				
Temperature - High	NA	M	Q	1, 2, 3
c. Heat Exchanger Area				
Ventilation ΔT - High	NA	M	Q	1, 2, 3
d. SICCS Initiation	NA	R	NA	1, 2, 3
e. Reactor Vessel Water				
Level - Low Low, Level 2	NA	M	P	1, 2, 3

ATTACHMENT C

SIGNIFICANT HAZARDS CONSIDERATION

Commonwealth Edison has evaluated the proposed Technical Specification Amendment and determined that it does not represent a significant hazards consideration. Based on the criteria for defining a significant hazards consideration established in 10CFR50.92 operation of LaSalle County Station Units 1 and 2 in accordance with the proposed amendment will not:

- 1) Involve a significant increase in the probability or consequences of an accident previously evaluated because:

Section 15.2.4 of the UFSAR provides the safety analysis for inadvertent MSIV closure. MST temperature trips are a potential cause of spurious MSIV closures therefore, by removing the temperature trips the risk of an inadvertent MSIV closure will be reduced.

The safety analysis for steam system break outside of the containment (UFSAR 15.6.4) assumes that a main steamline instantaneously and circumferentially breaks at a location downstream of the outermost isolation valve. Therefore the analysis does not take into account the ability to detect small steam leaks in the MST.

- 2) Create the possibility of a new or different kind of accident from any accident previously evaluated because:

The safety evaluation in section 15.6.4 of the UFSAR does not include an analysis of small steam leaks. The only analysis is for a catastrophic failure of a main steamline which represents the envelope evaluation of steamline failures outside of the containment.

- 3) Involve a significant reduction in the margin of safety because:

Analysis has shown that the decrease in the margin of safety due to removal of the MST temperature trips is insignificant. The small increase in risk to plant safety due to small steam line breaks which quickly propagate to large breaks is more than offset by the reduction in risk to plant safety posed by the challenges to plant safety systems caused by spurious MSIV closures.

The MST high temperature alarms will be retained to provide early warning for small steam leaks outside of the containment.

Guidance has been provided in the Federal Register Volume 51 (reference (b)), for the application of standards to license change requests for determination of the existence of significant hazards considerations. That document provides examples of amendments which are and are not considered likely to involve significant hazards considerations.

This proposed amendment does not involve a significant relaxation of the criteria used to establish safety limits, a significant relaxation of the bases for the limiting safety system settings or a significant relaxation of the bases for the limiting conditions for operations. Therefore, based on the guidance provided in the Federal Register and the criteria established in 10CFR50.92(e), the proposed change does not constitute a significant hazards consideration.

This proposed amendment most closely resembles example e. (vi) on page 7751, "a change which either may result in some increase to the probability or consequences of a previously analyzed accident or may reduce in some way a safety margin, but where the results of the change are clearly within all acceptable criteria with respect to the system or component specified in the Standard Review Plan, eg, a change resulting from the application of a small refinement of a previously used calculational model or design method."

ATTACHMENT D

RISK-BASED EVALUATION OF TECHNICAL SPECIFICATION
PROBLEMS AT THE LASALLE COUNTY NUCLEAR STATION

EPRI Research Project 2142-2

Section

- 1.0 Introduction.
- 2.0 General Approach for Applying Probabilistic Methods In Technical Specification Improvement Activities.
- 4.0 Main Steam Tunnel Ambient and Delta Temperature Trip (Tech Spec 3.3.2).
- 6.0 Summary and Conclusions.
- 7.0 Data Analysis.
- App. B MST Temperature Trips Supplemental Analysis.