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August 18, 1989

Dr. Thomas E. Murley, 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 Remove Cycle-Specific
Core Limits from the Technical Specifications
NRC Docket Nos. 50-373 and 50-374

Reference (a): Generic Letter 88-16 dated October 4, 1988.

Dr. Murley:

Pursuant to 10 CFR 50.90, Commonwealth Edison proposes to amend the Technical Specifications (Appendix A) of Facility Operating Licenses NPF-11 and NPF-18 for LaSalle County Station Units 1 and 2, respectively. The proposed amendment deletes cycle-specific core limits from the Technical Specifications consistent with the guidance in the referenced Generic Letter. In addition, related changes to Appendix A Section 5 design feature descriptions are proposed to provide for efficient transition to advanced fuel and control blade designs which have been NRC approved.

As suggested in the referenced Generic Letter, the values of the removed core limits will be contained in a Core Operating Limits Report, which is referenced in each of the respective Limiting Conditions of Operation. Similar amendments have been previously approved for the Oconee and Brunswick plants. The bases for the proposed LaSalle changes are described in Attachment 1 including a safety evaluation summary. The affected pages of the Technical Specifications are listed, described, and contained in Attachment 2.

The proposed changes have been reviewed and approved by both On-Site and Off-Site Review in accordance with Commonwealth Edison procedures. We have reviewed these proposed amendments in accordance with 10 CFR 50.92(c) and determined that no significant hazards consideration exists. This evaluation is documented in Attachment 3.

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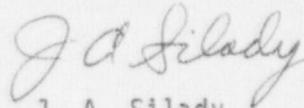
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Enclosed as Attachment 4 are examples of the Core Operating Limits Report for both units using data for the operating cycles currently in progress. As suggested in the Generic Letter and specified in the proposed Section 6 administrative requirement, CECO will provide these reports for each future LaSalle County reload beginning with Unit 1 Cycle 4 (Reload 3), which is currently scheduled to start in December, 1989. Whenever appropriate, the reloads will be reviewed by CECO per 10 CFR 50.59 in order to realize the full benefits of the Generic Letter 88-16 approach including reduced NRC resources for reload reviews. Since the Unit 1 Cycle 4 reload utilizes NRC-approved fuel types, analytical methodology, etc., CECO believes that 10 CFR 50.59 can be applied, provided this amendment is processed in a timely manner.

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

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

Very truly yours,



J. A. Silady
Nuclear Licensing Administrator

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- Attachments 1: Description of Proposed Changes and Safety Evaluation
 2: Proposed Changes to Appendix A Technical Specifications for LaSalle County Units 1 and 2
 3: Significant Hazards Evaluation
 4: Examples of Core Operating Limits Reports

- cc: A.B. Davis - Region Administrator, Region III
 R.D. Lanksbury - Senior Resident Inspector, LaSalle
 P.C. Shemanski - Project Manager - NRR
 Office of Nuclear Facility Services - IDNS

SUBSCRIBED AND SWORN to before me this 18th day of August, 1989

Lelia F. Mayo
Notary Public



REMOVAL OF CYCLE SPECIFIC
POWER DISTRIBUTION LIMITS FROM
LASALLE COUNTY STATION UNITS 1 AND 2
TECHNICAL SPECIFICATIONS

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4.	Example Core Operating Limits Reports (COLR)

ATTACHMENT 1

BASES AND SAFETY EVALUATION FOR PROPOSED CHANGES

The following evaluation describes the proposed actions to remove cycle-specific power distribution limits (Average Planar Linear Heat Generation Rate, Minimum Critical Power Ratio, Linear Heat Generation Rate, and Rod Block Monitor Upscale Setpoints) from the LaSalle County Station Units 1 and 2 Technical Specifications, and place them in a controlled document called the Core Operating Limits Report. In addition, the Section 5 description of the fuel and control rod assemblies are reworded to allow transition to approved, advanced designs as they become available. Completion of these actions will allow application of 10 CFR 50.59 to reload licensing submittals for future LaSalle cycles. If no unreviewed safety questions exist, reload licensing submittals and NRC approval will not be required prior to cycle operation.

A. BACKGROUND

Currently, the LaSalle County Station, Units 1 and 2 Technical Specifications include cycle-specific and fuel bundle type specific power distribution operating limits. Typically, changes to these power distribution limits must be submitted prior to each refueling outage to reflect upcoming cycle specific characteristics. Since these limits are developed using a methodology previously approved by the NRC, these frequent license amendments are an unnecessary burden on utility and NRC resources. To eliminate these unnecessary amendments, the NRC has issued Generic Letter 88-16, "Removal of Cycle-Specific Parameter Limits From Technical Specifications", to provide guidance in changing the Technical Specifications. Commonwealth Edison has prepared changes to the Technical Specifications consistent with Generic Letter 88-16 and the previously approved lead BWR (Brunswick) amendment to allow an expedited NRC review of the proposed amendment.

B. DESCRIPTION OF TECHNICAL SPECIFICATION CHANGES

The Technical Specification changes are individually listed and described in Attachment 2 followed by the actual page changes for each unit. The following sections summarize the primary functions of the proposed changes.

1. Implementation of Generic Letter 88-16:

The proposed Technical Specification amendment removes the cycle-specific and fuel bundle type specific limits (Average Planar Linear Heat Generation Rate, Minimum Critical Power Ratio, Linear Heat Generation Rate, and Rod Block Monitor Upscale Setpoints) and in their place references the Core Operating Limits Report (COLR). The

COLR is a unit specific document containing the power distribution limits that are applicable for a specific cycle. Commonwealth Edison will continue to meet its responsibility for ensuring NRC approved analytical methods are used for reload safety analyses and, per this amendment, as the basis for the results reported in the COLR. Examples of how the COLR would appear for the present LaSalle cycles (Unit 1 Cycle 3 and Unit 2 Cycle 3) are provided in Attachment 4. The COLR for future operating cycles will be submitted to the NRC prior to startup from each refueling outage, as required by Generic Letter 88-16. The COLRs for both LaSalle units will be two separate attachments to a new LaSalle Administrative Procedure (LAP) which will control the implementation and revision of the COLR's. It should be noted that COLR revisions will receive the same level of detailed review and required approvals in the Nuclear Fuel Services Department (NFS), On-Site Review, and Off-Site Review as Technical Specification changes. In addition, the Definitions section of the Technical Specifications shall have an entry entitled "Core Operating Limits Report" and there will be a new administrative reporting requirement for the COLR added to the existing Section 6.

2. MCPR and MAPLHGR Bases Section Changes:

For consistency with the above Generic Letter 88-16 changes, some MCPR bases changes are appropriate. General Electric has performed generic analyses to establish conservative MCPR Operating Limits which may be applied to support operation with certain equipment out-of-service (NEDC-31455). The analyses are bounding in that a conservative end of cycle power distribution is assumed. However, the report requires that a cycle-specific verification of MCPR LCO values for certain limiting transients be performed to ensure these assumptions remain conservative. These statements to perform these cycle-specific checks are being removed from the MCPR Technical Specification bases since it is not appropriate for the criteria to determine the Limiting Condition for Operation values to be included in the bases section. The MCPR Technical Specification bases will now state that the MCPR LCO values for these certain equipment out-of-services will be valid provided that these limits bound the cycle specific results. This will require that the MCPR LCO values are verified to be valid, either by the required checks for the certain limiting transients, or if necessary, by cycle-specific analyses of the appropriate out-of-services.

Bases section details on the MCPR limit derivation as a function of non-rated flow conditions (K_f) and whether Rod Withdrawal Error is limiting for the cycle are also removed for simplicity and since the COLR will contain the appropriate MCPR LCO's and curves. Also deleted from the MAPLHGR Bases section is a discussion of how APLHGR

values are calculated for the specific fuel types. This is replaced with a more general statement that the calculation procedure is consistent with the requirement of 10 CFR 50, Appendix K.

3. Design Feature (Section 5) Changes:

The transition to advanced fuel and control blade designs has necessitated a modification to certain Technical Specification design features (Section 5). These changes provide the required flexibility to allow installation of NRC approved fuel and control blade designs as they become available.

C. IMPLEMENTATION PLAN

Although this amendment proposes Technical Specification changes for both LaSalle County Station units, Commonwealth Edison intends to implement these changes as Cycle 4 operation begins on the individual unit. The primary difference between the current Cycle 3 operation and Cycle 4 operation is that the reload fuel for both Units will consist of the GE9B Fuel Design during Cycle 4 operation. Amendment 18 to GESTAR (NEDE-24011-P-A) incorporated the GE9B design, and received generic NRC approval in May of 1988. For this reason, Commonwealth Edison intends to employ the provisions in 10 CFR 50.59 for reviewing this new fuel design and will include the appropriate power distribution limits in the updated COLR's. Therefore, issuance of this amendment is needed to support the initial start-up of LaSalle County Unit 1 Cycle 4, currently projected for December, 1989. The Unit 2 Technical Specification changes will not be required until Cycle 4 operation begins in June, 1990 based on the current outage schedule.

D. SAFETY EVALUATION SUMMARY

The preceding discussions in Section B addressed removal of cycle specific power distribution limits from the Technical Specifications of LaSalle County Station Units 1 and 2, and referencing of a unit-specific Core Operating Limits Report per Generic Letter 88-16. Since CECO will continue to assure that NRC approved methodology and fuel types are utilized for each reload application and will submit the COLR prior to post-refueling startup for NRC information and trending, Commonwealth Edison concludes that the proposed changes do not represent an unreviewed safety question and are acceptable to facilitate 10 CFR 50.59 reload licensing (with Edison having responsibility for updating cycle specific power distribution limits) for LaSalle Unit 1 Cycle 4, LaSalle Unit 2 Cycle 4, and future LaSalle operating cycles.

With respect to the associated changes to the design features section, the deletion of some fuel and control rod design details also has no safety impact since NRC review and approval of new designs which involve potential unreviewed safety questions is still required and will be obtained via current programs (e.g. GESTAR amendments for new GE fuel types) and as required by 10 CFR 50.92(c) and 10 CFR 50.59. Similarly, the simplification of the Bases discussion on MCPR limit verification for equipment out-of-service is administrative in nature and consistent with the Generic Letter 88-16 changes.

These conclusions are valid provided the following items are completed prior to startup of Cycle 4 operation of the respective unit:

- a. The Attachment 2 Technical Specifications are NRC approved and LaSalle procedures are modified to be consistent with the revised Technical Specifications.
- b. A LaSalle Administration Procedure (LAP) is developed to contain and control implementation and revision of each unit's Core Operating Limits Report.
- c. The GE9B fuel design is reviewed per 10 CFR 50.59, and the appropriate power distribution limits added to each Unit's Core Operating Limits Report.

As required by 10 CFR 50.92(c), significant hazards considerations has been provided in Attachment 3.