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LaSalle Generating Station
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November 15, 1999

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555

LaSalle County Station, Units 1 and 2
Facility Operating License Nos. NPF-11 and NPF-18
NRC Docket Nos. 50-373 and 50-374

Subject: Supplemental Information to Request for a Change to
Technical Specifications Related to Vacuum Relief System

Reference: Letter from J. A. Benjamin (ComEd) to U.S. NRC, "Application
for Amendment to Appendix A, Technical Specifications,
'Vacuum Relief System'," dated August 6, 1999.

In the reference document, Commonwealth Edison (ComEd) Company proposed changes to Facility Operating License Nos. NPF-11 and NPF-18 Appendix A, the Technical Specifications (TS), for LaSalle County Station, Units 1 and 2. The proposed change modified TS Section 3/4.6.4, "Vacuum Relief" to be consistent with the TS provided in the Improved Standard Technical Specifications (ISTS), NUREG 1433, Revision 1, "Standard Technical Specifications, General Electric Plants, BWR/4." This letter provides additional clarification of the proposed relocation of the deleted Surveillance Requirements (SR) into a licensee-controlled document, and to forward the proposed TS Bases pages related to this change. The revised TS Bases is consistent with the proposed changes submitted under the reference document. The bases change will be implemented following NRC approval of the proposed changes, as part of the implementation of the License Amendments.

In addition, proposed TS SR 4.6.4.1.b.2 has been revised to make the wording consistent with SR 4.6.4.1.b.1. The revised marked-up pages 3/4 6-35 (Unit 1) and 3/4 6-38 (Unit 2) are marked up with the changes, which are editorial in nature from those originally submitted. The remaining affected TS pages and inserts are included for continuity with the original submittal.

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A Unicom Company

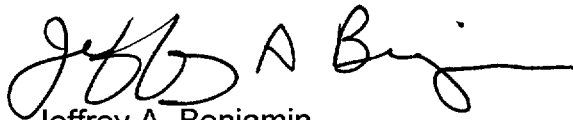
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Page 2

The proposed change deleted SR 4.6.4.1.b.2 and SR 4.6.4.1.b.3.b) related to demonstrating operability of the suppression chamber-drywell vacuum breaker position indication. These deleted SRs will be relocated to the LaSalle County Station Administrative Technical Requirements (ATRs) and to the UFSAR by reference to the applicable ATR section, and all changes will be controlled pursuant 10 CFR 50.59, "Changes, Tests and Experiments."

The proposed editorial TS changes, TS Bases changes, and the supplemental information are consistent with, and do not require a change to, the original no significant hazards evaluation submitted by the referenced letter.

Should you have any questions concerning this letter, please contact Mr. Frank A. Spangenberg, III, Regulatory Assurance Manager, at (815) 357-6761, extension 2383.

Respectfully,

A handwritten signature in black ink, appearing to read "Jeffrey A. Benjamin". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Jeffrey A. Benjamin
Site Vice President
LaSalle County Station

Attachment

cc: Regional Administrator – NRC Region III
NRC Senior Resident Inspector – LaSalle County Station


STATE OF ILLINOIS)
IN THE MATTER OF)
COMMONWEALTH EDISON COMPANY)
LASALLE COUNTY STATION - UNIT 1 & UNIT 2)

Docket Nos. 50-373
50-374

Subject: Supplemental Information to Request for a Change to
Technical Specifications Related to Vacuum Relief System

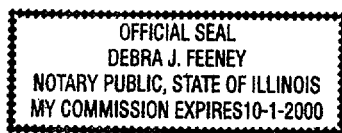
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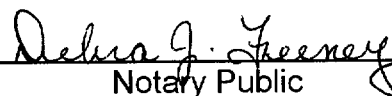
I affirm that the content of this transmittal is true and correct to the best of my
knowledge, information and belief.



Jeffrey A. Benjamin
Site Vice President
LaSalle County Station

Subscribed and sworn to before me, a Notary Public in and for the State
above named, this 11th day of November, 1999.
My Commission expires on 10-1, 2000.





Notary Public

ATTACHMENT

MARKED-UP TECHNICAL SPECIFICATION PAGES
FOR PROPOSED CHANGES

REVISED PAGES

NPF-11

3/4 6-35
Insert Page A-1*
3/4 6-36*
B 3/4 6-4a
Insert Page A-2

NPF-18

3/4 6-38
Insert Page A-3*
3/4 6-39*
B 3/4 6-4a
Insert Page A-4

* No changes from the original submittal dated August 6, 1999, included for continuity.

CONTAINMENT SYSTEMS

3/4.6.4 VACUUM RELIEF

LIMITING CONDITION FOR OPERATION

3.6.4 All suppression chamber - drywell vacuum breakers shall be OPERABLE, and closed.

APPLICABILITY: OPERATIONAL CONDITIONS 1, 2, and 3.

ACTION:

Replace with Insert A Attached

- a. With one suppression chamber - drywell vacuum breaker inoperable and/or open, within 4 hours close the manual isolation valves on both sides of the inoperable and/or open vacuum breaker. Restore the inoperable and/or open vacuum breaker to OPERABLE and closed status within 72 hours or be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.
- b. With one position indicator of any OPERABLE suppression chamber - drywell vacuum breaker inoperable, restore the inoperable position indicator to OPERABLE status within 14 days or visually verify the vacuum breaker to be closed at least once per 24 hours. Otherwise, declare the vacuum breaker inoperable.

SURVEILLANCE REQUIREMENTS

4.6.4.1 Each suppression chamber - drywell vacuum breaker shall be:

a. Verified closed at least once per 14 days.

b. Demonstrated OPERABLE:

1. At least once per 31 days and within 12 hours after any discharge of steam to the suppression chamber from the safety-relief valves, by cycling each vacuum breaker through at least one complete cycle of full travel.

2. At least once per 31 days by verifying both position indicators OPERABLE by performance of a CHANNEL FUNCTIONAL TEST.

3. At least once per 18 months by:

a) Verifying the force required to open the vacuum breaker, from the closed position, to be less than or equal to 0.5 psid, and

b) Verifying both position indicators OPERABLE by performance of a CHANNEL CALIBRATION.

Add Note*, Insert B Attached

Insert Page A-1

Insert A

- a. With one suppression chamber – drywell vacuum breaker inoperable for opening, restore the inoperable vacuum breaker to OPERABLE status within 72 hours or be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.
- b. With one suppression chamber – drywell vacuum breaker inoperable and open, within 4 hours close the manual isolation valves on both sides of the inoperable and open vacuum breaker. Restore the inoperable vacuum breaker to OPERABLE status within 72 hours or be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.

Insert B

- * Surveillance Requirement 4.6.4.1.a is not required to be met for suppression chamber - drywell vacuum breakers that are open during Surveillances or for suppression chamber - drywell vacuum breakers that are functioning for pressure relief during normal and off-normal plant operations.

CONTAINMENT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

4.6.4.2 The manual isolation valves on both sides of an inoperable and/or open suppression chamber-drywell vacuum breaker shall be verified to be closed at least once per 7 days.

CONTAINMENT SYSTEMS

BASES

PRIMARY CONTAINMENT ISOLATION VALVES (Continued)

with the control room, at the valve controls, (2) instructing this operator to close these valves in an accident situation, and (3) assuring that environmental conditions will not preclude access to close the valves and that this action will prevent the release of radioactivity outside the primary containment.

Surveillance Requirement 4.6.3.6.a verifies leakage through any one main steamline is ≤ 100 scfh, not to exceed 400 scfh for all four main steamlines, when tested at $\geq P_c$ (25.0 psig). The transient and accident analyses are based on leakage at the specified leakage rate. The leakage rate for main steamlines through the isolation valves must be verified to be in accordance with the Primary Containment Leakage Rate Testing Program. A Note has been added to this Surveillance Requirement requiring the results to be excluded from the total of Type B and Type C tests. This ensures that leakage rate for main steamlines through the isolation valves is properly accounted for in determining the overall primary containment leakage rate. The Frequency is required by the Primary Containment Leakage Rate Testing Program.

Surveillance Requirement 4.6.3.6.b test of hydrostatically tested lines provides assurance that the assumptions of UFSAR Section 6.2 are met. The combined leakage rates must be demonstrated in accordance with the leakage rate test at a frequency in accordance with the Primary Containment Leakage Rate Testing Program.

3/4.6.4 VACUUM RELIEF

Vacuum relief breakers are provided to equalize the pressure between the suppression chamber and drywell. This system will maintain the structural integrity of the primary containment under conditions of large differential pressures.

The vacuum breakers between the suppression chamber and the drywell must not be inoperable in the open position since this would allow bypassing of the suppression pool in case of an accident. There are four valves to provide redundancy so that operation may continue for up to 72 hours with one vacuum breaker inoperable provided that the manual isolation valves on each side are in the closed position.

Replace with Unit 1 insert attached

3/4.6.4 VACUUM RELIEF

The Containment Vacuum Relief System consists of four (4) suppression chamber – drywell vacuum breakers. These vacuum breakers are provided to equalize the pressure between the suppression chamber and drywell to maintain the structural integrity of the primary containment under conditions of large differential pressures. The vacuum breakers are outside of primary containment and form an extension of the primary containment boundary. Two local manual butterfly valves, one on each side of the vacuum breaker, are provided as system isolation valves should the vacuum breaker fail open.

For the vacuum breakers to be operable they must be capable of relieving pressure, however, they are required to be closed except during testing or when the vacuum breakers are performing their intended design function. Due to the relatively low differential pressure setpoint, the vacuum breakers may lift to relieve pressure differential seen during normal and off-normal conditions. This includes surveillance testing or actual operations where heat is added to the Suppression Chamber (i.e., Reactor Core Isolation Cooling and Safety Relief Valve testing) that ultimately raises the pressure in the suppression chamber, or other conditions that impact the temperature and pressure in the suppression chamber or drywell. The resulting differential pressure between the suppression chamber and the drywell, if greater than the setpoint, will be relieved by the momentary opening of one or more vacuum breakers and does not cause the valve to open for an extended period of time. The vacuum breakers provide assurance that the drywell-to-suppression chamber negative differential pressure remains below the design value, and the requirement for the vacuum breakers to be closed ensures that by-pass leakage between the suppression chamber and the drywell is minimized should a Loss of Coolant Accident occur.

Only three (3) suppression chamber – drywell vacuum breakers are required to perform the pressure relief function. Therefore in the event that one vacuum breaker is inoperable operation may continue for up to 72 hours provided that the manual isolation valves are closed on each side of any inoperable and open vacuum breaker.

CONTAINMENT SYSTEMS

3/4.6.4 VACUUM RELIEF

LIMITING CONDITION FOR OPERATION

3.6.4 All suppression chamber - drywell vacuum breakers shall be OPERABLE, and closed.

APPLICABILITY: OPERATIONAL CONDITIONS 1, 2, and 3.

ACTION:

Replace with Insert A Attached

- a. With one suppression chamber - drywell vacuum breaker inoperable and/or open, within 4 hours close the manual isolation valves on both sides of the inoperable and/or open vacuum breaker. Restore the inoperable and/or open vacuum breaker to OPERABLE and closed status within 72 hours or be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.
- b. With one position indicator of any OPERABLE suppression chamber - drywell vacuum breaker inoperable, restore the inoperable position indicator to OPERABLE status within 14 days or visually verify the vacuum breaker to be closed at least once per 24 hours. Otherwise, declare the vacuum breaker inoperable.

SURVEILLANCE REQUIREMENTS

4.6.4.1 Each suppression chamber - drywell vacuum breaker shall be:

- a. Verified closed at least once per 7 days.
- b. Demonstrated OPERABLE:
 - 1. At least once per 31 days and within 12 hours after any discharge of steam to the suppression chamber from the safety-relief valves, by cycling each vacuum breaker through at least one complete cycle of full travel.
 - 2. At least once per 31 days by verifying both position indicators OPERABLE by performance of a CHANNEL FUNCTIONAL TEST.
- B. At least once per 18 months by:
 - a) Verifying the force required to open the vacuum breaker, from the closed position, to be less than or equal to 0.5 psid, and
 - b) Verifying both position indicators OPERABLE by performance of a CHANNEL CALIBRATION.

Add Note*, Insert B Attached

Insert Page A-3

Insert A

- c. With one suppression chamber – drywell vacuum breaker inoperable for opening, restore the inoperable vacuum breaker to OPERABLE status within 72 hours or be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.
- d. With one suppression chamber – drywell vacuum breaker inoperable and open, within 4 hours close the manual isolation valves on both sides of the inoperable and open vacuum breaker. Restore the inoperable vacuum breaker to OPERABLE status within 72 hours or be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.

Insert B

- * Surveillance Requirement 4.6.4.1.a is not required to be met for suppression chamber - drywell vacuum breakers that are open during Surveillances or for suppression chamber - drywell vacuum breakers that are functioning for pressure relief during normal and off-normal plant operations.

CONTAINMENT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

4.6.4.2 The manual isolation valves on both sides of an inoperable and/or open suppression chamber-drywell vacuum breaker shall be verified to be closed at least once per 7 days. e

CONTAINMENT SYSTEMS

BASES

PRIMARY CONTAINMENT ISOLATION VALVES (Continued)

This specification provides assurance that the PCIVs will perform their designed safety functions to control leakage from the primary containment during accidents.

The opening of locked or sealed closed containment isolation valves on an intermittent basis under administrative control includes the following considerations: (1) stationing an operator, who is in constant communication with the control room, at the valve controls, (2) instructing this operator to close these valves in an accident situation, and (3) assuring that environmental conditions will not preclude access to close the valves and that this action will prevent the release of radioactivity outside the primary containment.

Surveillance Requirement 4.6.3.6.a verifies leakage through any one main steamline is ≤ 100 scfh, not to exceed 400 scfh for all four main steamlines when tested at $\geq P_1$ (25.0 psig). The transient and accident analyses are based on leakage at the specified leakage rate. The leakage rate for main steamlines through the isolation valves must be verified to be in accordance with the Primary Containment Leakage Rate Testing Program. A Note has been added to this Surveillance Requirement requiring the results to be excluded from the total of Type B and Type C tests. This ensures that leakage rate for main steamlines through the isolation valves is properly accounted for in determining the overall primary containment leakage rate. The frequency is required by the Primary Containment Leakage Rate Testing Program.

Surveillance Requirement 4.6.3.6.b test of hydrostatically tested lines provides assurance that the assumptions of UFSAR Section 6.2 are met. The combined leakage rates must be demonstrated in accordance with the leakage rate test at a frequency in accordance with the Primary Containment Leakage Rate Testing Program.

3/4.6.4 VACUUM RELIEF

replace with unit 2 insert attached

Vacuum relief breakers are provided to equalize the pressure between the suppression chamber and drywell. This system will maintain the structural integrity of the primary containment under conditions of large differential pressures.

The vacuum breakers between the suppression chamber and the drywell must not be inoperable in the open position since this would allow bypassing of the suppression pool in case of an accident. There are four valves to provide redundancy so that operation may continue for up to 72 hours with one vacuum breaker inoperable provided that the manual isolation valves on each side are in the closed position.

3/4.6.4 VACUUM RELIEF

The Containment Vacuum Relief System consists of four (4) suppression chamber – drywell vacuum breakers. These vacuum breakers are provided to equalize the pressure between the suppression chamber and drywell to maintain the structural integrity of the primary containment under conditions of large differential pressures. The vacuum breakers are outside of primary containment and form an extension of the primary containment boundary. Two local manual butterfly valves, one on each side of the vacuum breaker, are provided as system isolation valves should the vacuum breaker fail open.

For the vacuum breakers to be operable they must be capable of relieving pressure, however, they are required to be closed except during testing or when the vacuum breakers are performing their intended design function. Due to the relatively low differential pressure setpoint, the vacuum breakers may lift to relieve pressure differential seen during normal and off-normal conditions. This includes surveillance testing or actual operations where heat is added to the Suppression Chamber (i.e., Reactor Core Isolation Cooling and Safety Relief Valve testing) that ultimately raises the pressure in the suppression chamber, or other conditions that impact the temperature and pressure in the suppression chamber or drywell. The resulting differential pressure between the suppression chamber and the drywell, if greater than the setpoint, will be relieved by the momentary opening of one or more vacuum breakers and does not cause the valve to open for an extended period of time. The vacuum breakers provide assurance that the drywell-to-suppression chamber negative differential pressure remains below the design value, and the requirement for the vacuum breakers to be closed ensures that by-pass leakage between the suppression chamber and the drywell is minimized should a Loss of Coolant Accident occur.

Only three (3) suppression chamber – drywell vacuum breakers are required to perform the pressure relief function. Therefore in the event that one vacuum breaker is inoperable operation may continue for up to 72 hours provided that the manual isolation valves are closed on each side of any inoperable and open vacuum breaker.