Therefore, operation of the facility in accordance with the requested change will not result in a significant reduction in the margin or safety.

The NRC staff has reviewed the licensee's analysis and, based on this review, it appears that the three standards of 10 CFR 50.92(c) are satisfied. Therefore, the NRC staff proposes to determine that the amendment request involves no significant hazards consideration.

Local Public Document Room location: Hartsville Memorial Library, 147 West College Avenue, Hartsville, South Carolina 29550

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Commonwealth Edison Company, Docket Nos. 50-373 and 50-374, LaSalle County Station, Units 1 and 2, LaSalle County, Illinois

Date of amendment request: October 24, 1994

Description of amendment request: The proposed amendments would restructure the primary containment integrity and primary containment leakage technical specifications (TS) to reduce the repetition of those requirements contained in NRC regulations such as Appendix J to 10 CFR 50. The amendments also support proposed exemptions from Appendix J requirements related to the scheduling of containment integrated leak rate tests (CILRT). In addition to the restructuring and scheduling changes, the proposed amendments incorporate (1) the relocation of the list of primary containment isolation valves in accordance with Generic Letter 91-08, "Removal of Component Lists from Technical Specifications," and (2) a revision of the interval for functional testing of hydrogen recombiners from 6 months to 18 months in accordance with Generic Letter 93-05, "Line-Item **Technical Specifications Improvements** to Reduce Surveillance Requirements for Testing During Power Operation.'

Basis for proposed no significant hazards consideration determination: As required by 10 CFR 50.91(a), the licensee has provided its analysis of the issue of no significant hazards consideration, which is presented below:

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

a. The relocation of Technical Specification 3/4.6.1.2, Primary Containment Leakage, and Surveillance Requirements 4.6.1.1.a, 4.6.4.3, and 4.6.6.1.d to specification 3/4.6.1.1, Primary Containment Integrity, as Surveillance Requirement 4.6.1.1.b continues to assure that Primary Containment leakage is maintained within the analyzed limit assumed for accident analysis by testing in accordance with 10 CFR part 50, Appendix J as modified by approved exemptions.

The requirement to be less than 0.75 La for as-left Type A test and less than 0.60 La for Type B and C tests prior to first unit startup following testing performed in accordance with 10 CFR part 50, Appendix J, as modified by approved exemptions, provides margin for degradation between tests and thus primary containment integrity is maintained during the time period between required leakage testing. The current Limiting Condition for Operation 3.6.1.2 in conjunction with Surveillance Requirements 4.6.1.2 basically require the same leakage limits as proposed Surveillance Requirement 4.6.1.1.b. The Limiting Condition for Operation (LCO) is required to be less than 1.0 L_a and is applicable during a fuel cycle for the Type A test. The LCO for Type B and C combined leakage total is currently required to be less than 0.60 La. The proposed Surveillance Requirement maintains the following:

1. The current LCO for Overall Containment leakage (as determined by a Type A test) and for the Type B and C combined leakage during the cycle by requiring overall containment leakage to be less than 1.0 L_a and Type B and C leakage total less than 0.60 L_a .

 $\begin{array}{c} L_a.\\ 2. \mbox{ The associated limits specified in the current Action Statements are maintained by verifying Overall Containment leakage to be less than 0.75 La and Type B and C leakage total less than 0.60 La prior to startup from an outage in which the applicable leakage testing is conducted. \end{array}$

Therefore, there is no change to the consequences of an accident previously evaluated, because maintaining leakage within the analyzed limit assumed for accident analysis does not change either the onsite or offsite dose consequences resulting from an accident. In addition to this, containment leakage is not an accident initiator, so there is no effect on the probability of accident initiators. Thus there is no increase in the probability of an accident previously analyzed.

b. Relocation of Technical Specification table of Primary Containment Isolation Valves, Table 3.6.3-1, to the LaSalle UFSAR is an administrative change to remove the component list of Primary Containment Isolation Valves, Table 3.6.3-1, from the Technical Specifications. The Limiting Condition for Operation (LCO), 3.6.3, is being revised to define which components the LCO applies to. The wording of the revised LCO encompasses all of the components listed in the current Technical Specification Table 3.6.3. Removal of this component list does not change the probability of any accident initiators or change any other relevant initial assumptions. Also, there is no change to the consequences of an accident previously evaluated, because removing this list from Technical Specifications does not change either the onsite or offsite dose consequences

resulting from the event. The component list will be controlled by an Administrative Procedure and can only be changed by the 10 CFR 50.59 change process with review and approval per the Onsite Review and Investigative Function. Therefore, there is no increase in either the probability or consequences of an accident previously evaluated.

c. The change in the functional test interval for the Drywell and Suppression Chamber Hydrogen Recombiner systems from "once per 6 months" to "once per 18 months" was determined by the NRC in NUREG 1366 and Generic Letter 93-05 to be acceptable by evaluation of the industry Licensing Event Reports (LERs) to assess the reliability of hydrogen recombiners. The conclusion was that the interval should be changed, because of the redundancy and apparent high reliability. A review of LaSalle LERs has shown only one LER that involved the operability of the hydrogen recombiner system and that was due to a Part 21 issue regarding circuit breaker environmental qualification. The breakers were replaced with qualified breakers. Therefore, the LaSalle Hydrogen Recombiner reliability is consistent with or better than that found by the NRC in determining this surveillance interval extension based on all LERs. Also, redundancy is the same as that assumed by the NRC; because, LaSalle has two hydrogen recombiner subsystems that are shared by Unit 1 and Unit 2. Both hydrogen recombiners subsystems are required to be Operable for either or both units in Operational Conditions 1 and 2. Based on LaSalle operating experience, the hydrogen recombiner subsystems are expected to continue to be demonstrated operable when the functional test is performed at an 18 month frequency.

Therefore, there is minimal or no change to the consequences of an accident previously evaluated, because at least one of the hydrogen recombiner subsystems is expected to be available to meet its design function to reduce the potential for hydrogen explosion or hydrogen burn in the primary containment. By preserving the integrity of the primary containment, there is no change to either the onsite or offsite dose consequences resulting from an accident. In addition to this, control of hydrogen concentration by use of a hydrogen recombiner subsystem is not an accident initiator, so there is no effect on the probability of accident initiators. Thus there is no significant increase in the probability of an accident previously analyzed.

d. The first exemption request is from the requirements of paragraph III.A.6(b) of Appendix J to allow LaSalle County Station Unit Two to return to or resume a Type A test schedule of three times in ten years (40 plus or minus 10 months). Due to consecutive failures, 10 CFR 50 Appendix J requires that Type A tests be performed every refueling outage on Unit Two until two consecutive Type A tests are satisfactory. 10 CFR Part 50 has an exemption process and is specified in 10 CFR Part 50.12(a), which states:

"The Commission may, upon application by any interested person or upon its own