

requirement to the technical specifications provides for the appropriate controls of the surveillances, above and beyond that presently controlled by procedure.

f. The proposed administrative changes are offered to correct typographical errors and delete cycle specific footnotes which are no longer applicable. The nature of the changes precludes them from impacting previously analyzed accidents.

The proposed changes therefore do not involve a significant increase in the probability or consequences of an accident previously evaluated.

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

a. The proposed changes increase the STI and AOT for certain actuation instrumentation in the RPS, ECCS, Isolation, CRBF, RCIC, ATWS-RPT, EOC-RPT, Monitoring, and Feedwater/Main Turbine Trip systems. There are no changes in instrumentation configuration and function, and no instrumentation setpoints are changed.

b. The changes to the Feedwater/Main Turbine Trip LCO action statements allow the plant operators a maximum degree of operational flexibility, while maintaining the instrumentation and protection needed for terminating the feedwater controller failure transient. The single failure proof criterion of the level sensors is maintained, and the logic of the protective instrumentation is not compromised. The changes to the LCO action statements do not constitute a change to the facility or its operation as described in the Safety Analysis Report.

c. Deleting the requirement for surveilling the APRM Neutron Flux—High, Setdown functional unit in Operating Condition 1 does not degrade thermal margins. The margin accommodates the anticipated maneuvers associated with plant power ascension. During a plant shutdown, rod insertion maneuvers, recirculation flow reduction, and xenon build-in all contribute to negative reactivity insertion which precludes the degradation and violation of thermal margins. The functions of the APRMs required to be OPERABLE in Operational Condition 1 which are in effect remain to ensure that reactor core thermal margins are not compromised.

d. The conduct of neutron instrument functional tests in the plant mode or condition in which the trips are applicable eliminates unnecessary testing during normal plant operations. The expected result of the functional testing is to demonstrate the operability of the instruments. The failure of any single instrument channel will neither cause nor prevent either a reactor scram or a control rod block.

e. Including the performance of channel checks for the applicable analog instrumentation as part of the technical specifications transfers control of the required surveillances from procedure to the technical specifications, as appropriate. The administrative nature of this change does not alter the functions, setpoints, or configuration of the associated instrumentation.

f. The administrative nature of the changes prevents them from affecting the functions,

setpoints, or configuration of the associated instrumentation from being affected by the changes.

The proposed changes do not create the possibility for an accident or malfunction of a different type than any previously evaluated in the UFSAR.

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

a. Setpoints are based upon the drift occurring during an 18 month calibration interval. The bases in the Technical Specifications either do not discuss STI, or state “\* \* \* one channel may be inoperable for brief intervals to conduct required surveillance.” The proposed changes are bounded by the analyses of the topical reports. These analyses, which were prepared by GE and approved by the NRC, examined the effects of extending STI and AOT and found that the proposed changes would not involve a significant reduction in the margin of safety.

b. The proposed changes to the turbine trip LCO action statements do not change any of the settings of the Level 8 setpoints. The single failure criteria of the multiple level sensors which sense and detect the Level 8 setpoint remains intact. The LCO maintains the requirement that no single instrument failure will prevent the feedwater pump turbines and main turbine trip on a valid Level 8 signal. Scram trip signals from the turbine retain the design feature that a single failure will neither initiate nor impede the initiation of a reactor scram (trip).

c. The setting, function, and conditional requirements of the APRM Neutron Flux—High, Setdown function are not altered. This change serves to achieve consistency between two Technical Specifications Tables. This eliminates the need for surveilling a function in a mode which is not applicable. The functions of the APRMs required to be OPERABLE in Operational Condition 1 remain to ensure that reactor core thermal margins are not compromised.

d. The reference to 4.0.4 applicability will assist to ensure consistent interpretation of the technical specifications by the plant operators. This assists in ensuring that the plant is operated within technical specification limitations. This change does not affect trip instrumentation setpoints, and the scram function of the RPS is assured by the weekly functional testing of the Manual Scram.

e. Including the instrumentation channel checks as part of technical specification requirements provides an appropriately regimented method of controlling the conduct of the surveillances. None of the functions, setpoints, or configuration of the associated analog instrumentation is affected by this administrative change.

f. The administrative nature of the changes serves to provide more concise guidance to the plant operating staff, and as such do not impact the safety margin.

The proposed changes do not significantly reduce the margin of safety as defined in the basis for any Technical Specification.

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 requested amendments involve no significant hazards consideration.

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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:* January 13, 1995.

*Description of amendment request:*  
The proposed amendments would revise the pressure alarm setpoint allowable values for the emergency core cooling system (ECCS) and reactor core isolation cooling (RCIC) system “keep filled” pressure instrumentation channels. The purpose of the proposed change is to lower the setpoint allowable values for these parameters to more realistic values based upon calculations performed by the licensee reflecting design changes and system performance. Also, the term “setpoint” is being changed to “setpoint allowable value” to clarify the use of the values. Additionally, two administrative/editorial changes are included to delete technical specification footnotes which are no longer applicable.

*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:

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 10 CFR 50.92, 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:

a. The proposed change in the technical specification allowable values for the ECCS and RCIC discharge line “keep filled” alarm instrument channels does not change the design bases or function of these systems as described in the technical specifications and UFSAR. An analysis performed by engineering demonstrates that the proposed allowable values are sufficient for verifying that the ECCS and RCIC pump discharge lines are full of water. In addition, setpoint