



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

March 23, 2015

Mr. Bryan Hanson
Senior Vice President
Exelon Generation Company, LLC
President and Chief Nuclear Officer
4300 Winfield Road
Warrenville, IL 60555

SUBJECT: LASALLE COUNTY STATION, UNITS 1 AND 2 - REPORT FOR THE ONSITE AUDIT REGARDING IMPLEMENTATION OF MITIGATING STRATEGIES AND RELIABLE SPENT FUEL POOL INSTRUMENTATION RELATED TO ORDERS EA-12-049 AND EA-12-051 (TAC NOS. MF1119, MF1120, MF1121, AND MF1122)

Dear Mr. Hanson:

On March 12, 2012, the U.S. Nuclear Regulatory Commission (NRC) issued Order EA-12-049, "Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond Design-Basis External Events" and Order EA-12-051, "Order to Modify Licenses With Regard To Reliable Spent Fuel Pool Instrumentation," (Agencywide Documents Access and Management System (ADAMS) Accession Nos. ML12054A736 and ML12054A679, respectively). The orders require holders of operating reactor licenses and construction permits issued under Title 10 of the *Code of Federal Regulations* Part 50 to submit for review, Overall Integrated Plans (OIPs) including descriptions of how compliance with the requirements of Attachment 2 of each order will be achieved.

By letter dated February 28, 2013 (ADAMS Accession No. ML13060A421), Exelon Generation Company, LLC (Exelon or the licensee) submitted its OIP for LaSalle County Station, Units 1 and 2 (LaSalle) in response to Order EA-12-049. By letters dated August 28, 2013, February 28, 2014, and August 28, 2014 (ADAMS Accession Nos. ML13241A283, ML14059A431, and ML14248A239, respectively), Exelon submitted its first three six-month updates to the OIP. By letter dated August 28, 2013 (ADAMS Accession No. ML13234A503), the NRC notified all licensees and construction permit holders that the staff is conducting audits of their responses to Order EA-12-049 in accordance with NRC Office of Nuclear Reactor Regulation (NRR) Office Instruction LIC-111, "Regulatory Audits" (ADAMS Accession No. ML082900195). This audit process led to the issuance of the LaSalle interim staff evaluation (ISE) dated February 21, 2014 (ADAMS Accession No. ML14030A223), and continues with in-office and onsite portions of this audit.

By letter dated February 28, 2013 (ADAMS Accession No. ML13063A323), the licensee submitted its OIP for LaSalle in response to Order EA-12-051. By letter dated June 7, 2013 (ADAMS Accession No. ML13134A093), the NRC staff sent a request for additional information (RAI) to the licensee. By letters dated July 3, 2013, August 28, 2013, February 28, 2014, and August 28, 2014 (ADAMS Accession Nos. ML13186A004, ML13241A233, ML14062A062, and ML14248A214, respectively), the licensee submitted its RAI responses and first three six-month updates to the OIP. The NRC staff's review led to the issuance of the LaSalle ISE and RAI

dated November 26, 2013 (ADAMS Accession No. ML13275A145). By letter dated March 26, 2014 (ADAMS Accession No. ML14083A620), the NRC notified all licensees and construction permit holders that the staff is conducting in-office and onsite audits of their responses to Order EA-12-051 in accordance with NRC NRR Office Instruction LIC-111, as discussed above.

The ongoing audit process, to include the in-office and onsite portions, allows the staff to assess whether it has enough information to make a safety evaluation of the Integrated Plans. The audit allows the staff to review open and confirmatory items from the mitigation strategies ISE, RAI responses from the spent fuel pool instrumentation (SFPI) ISE, the licensee's integrated plans, and other audit questions. Additionally, the staff gains a better understanding of submitted and updated information, audit information provided on ePortals, and preliminary Overall Program Documents/Final Integrated Plans while identifying additional information necessary for the licensee to supplement its plan and address staff potential concerns.

In support of the ongoing audit of the licensee's OIPs, as supplemented, the NRC staff conducted an onsite audit at LaSalle from January 12-15, 2015, per the audit plan dated December 9, 2015 (ADAMS Accession No. ML14338A110). The purpose of the onsite portion of the audit was to provide the NRC staff the opportunity to continue the audit review and gain key insights most easily obtained at the plant as to whether the licensee is on a successful path for compliance with the Mitigation Strategies and SFPI orders. The onsite activities included detailed analysis and calculation discussions, walk-throughs of strategies and equipment laydown, visualization of portable equipment storage and deployment, review of staging and deployment of offsite equipment, and review of installation details for SFPI equipment.

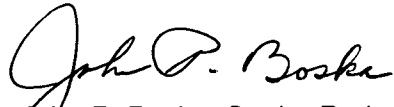
The enclosed audit report provides a summary of the activities for the onsite audit portion. Additionally, this report contains an attachment listing all open audit items currently under NRC staff review.

B. Hanson

- 3 -

If you have any questions, please contact me at 301-415-2901 or by e-mail at John.Boska@nrc.gov.

Sincerely,

A handwritten signature in black ink that reads "John P. Boska". The signature is written in a cursive style with a large, looping initial "J".

John P. Boska, Senior Project Manager
Orders Management Branch
Japan Lessons-Learned Division
Office of Nuclear Reactor Regulation

Docket Nos.: 50-373 and 50-374

Enclosure:
Audit report

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

AUDIT REPORT BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO ORDERS EA-12-049 AND EA-12-051 MODIFYING LICENSES
WITH REGARD TO REQUIREMENTS FOR
MITIGATION STRATEGIES FOR BEYOND-DESIGN-BASIS EXTERNAL EVENTS
AND RELIABLE SPENT FUEL POOL INSTRUMENTATION
EXELON GENERATION COMPANY, LLC
LASALLE COUNTY STATION, UNITS 1 AND 2
DOCKET NOS. 50-373 and 50-374

BACKGROUND AND AUDIT BASIS

On March 12, 2012, the U.S. Nuclear Regulatory Commission (NRC) issued Order EA-12-049, "Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond Design-Basis External Events" and Order EA-12-051, "Order to Modify Licenses With Regard To Reliable Spent Fuel Pool Instrumentation," (Agencywide Documents Access and Management System (ADAMS) Accession Nos. ML12054A736 and ML12054A679, respectively). Order EA-12-049 directs licensees to develop, implement, and maintain guidance and strategies to maintain or restore core cooling, containment, and spent fuel pool (SFP) cooling capabilities in the event of a beyond-design-basis external event (BDBEE). Order EA-12-051 requires, in part, that all operating reactor sites have a reliable means of remotely monitoring wide-range SFP levels to support effective prioritization of event mitigation and recovery actions in the event of a BDBEE. The orders require holders of operating reactor licenses and construction permits issued under Title 10 of the *Code of Federal Regulations* Part 50 to submit for review, Overall Integrated Plans (OIPs) including descriptions of how compliance with the requirements of Attachment 2 of each order will be achieved.

By letter dated February 28, 2013 (ADAMS Accession No. ML13060A421), Exelon Generation Company, LLC (Exelon or the licensee) submitted its OIP for LaSalle County Station, Units 1 and 2 (LaSalle) in response to Order EA-12-049. By letters dated August 28, 2013, February 28, 2014, and August 28, 2014 (ADAMS Accession Nos. ML13241A283, ML14059A431, and ML14248A239, respectively), Exelon submitted its first three six-month updates to the OIP. By letter dated August 28, 2013 (ADAMS Accession No. ML13234A503), the NRC notified all licensees and construction permit holders that the staff is conducting audits of their responses to Order EA-12-049 in accordance with NRC Office of Nuclear Reactor Regulation (NRR) Office

Enclosure

Instruction LIC-111, "Regulatory Audits" (ADAMS Accession No. ML082900195). This audit process led to the issuance of the LaSalle interim staff evaluation (ISE) dated February 21, 2014 (ADAMS Accession No. ML14030A223) and continues with in-office and onsite portions of this audit.

By letter dated February 28, 2013 (ADAMS Accession No. ML13063A323), the licensee submitted its OIP for LaSalle in response to Order EA-12-051. By letter dated June 7, 2013 (ADAMS Accession No. ML13134A093), the NRC staff sent a request for additional information (RAI) to the licensee. By letters dated July 3, 2013, August 28, 2013, February 28, 2014, and August 28, 2014 (ADAMS Accession Nos. ML13186A004, ML13241A238, ML14062A062, and ML14248A214, respectively), the licensee submitted its RAI responses and first three six-month updates to the OIP. The NRC staff's review led to the issuance of the LaSalle ISE and RAI dated November 26, 2013 (ADAMS Accession No. ML13275A145). By letter dated March 26, 2014 (ADAMS Accession No. ML14083A620), the NRC notified all licensees and construction permit holders that the staff is conducting in-office and onsite audits of their responses to Order EA-12-051 in accordance with NRC NRR Office Instruction LIC-111, as discussed above.

The ongoing audit process, to include the in-office and onsite portions, allows the staff to assess whether it has enough information to make a safety evaluation of the Integrated Plans. The audit allows the staff to review open and confirmatory items from the mitigation strategies ISE, RAI responses from the spent fuel pool instrumentation (SFPI) ISE, the licensee's integrated plans, and other audit questions. Additionally, the staff gains a better understanding of submitted and updated information, audit information provided on ePortals, and preliminary Overall Program Documents (OPDs)/Final Integrated Plans (FIPs) while identifying additional information necessary for the licensee to supplement its plan and address staff potential concerns.

In support of the ongoing audit of the licensee's OIPs, as supplemented, the NRC staff conducted an onsite audit at LaSalle from January 12-15, 2015, per the audit plan dated December 9, 2015 (ADAMS Accession No. ML14338A110). The purpose of the onsite portion of the audit was to provide the NRC staff the opportunity to continue the audit review and gain key insights most easily obtained at the plant as to whether the licensee is on a successful path for compliance with the Mitigation Strategies and SFPI orders. The onsite activities included detailed analysis and calculation discussions, walk-throughs of strategies and equipment laydown, visualization of portable equipment storage and deployment, review of staging and deployment of offsite equipment, and review of installation details for SFPI equipment.

Following the licensee's declarations of order compliance, the NRC staff will evaluate the OIPs, as supplemented; the resulting site-specific OPDs/FIPs; and, as appropriate, other licensee submittals based on the requirements in the orders. For Order EA-12-049, the staff will make a safety determination using the Nuclear Energy Institute (NEI) developed guidance document NEI 12-06, "Diverse and Flexible Coping Strategies (FLEX) Implementation Guide" issued in August 2012 (ADAMS Accession No. ML12242A378), as endorsed by NRC Japan Lessons-Learned Directorate (JLD) interim staff guidance (ISG) JLD-ISG-2012-01 "Compliance with Order EA-12-049, 'Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events'" (ADAMS Accession No. ML12229A174). For Order EA-12-051, the staff will make a safety determination using the NEI developed

guidance document NEI 12-02, Revision 1, "Industry Guidance for Compliance with NRC Order EA-12-051, 'To Modify Licenses with Regard to Reliable Spent Fuel Pool Instrumentation'" (ADAMS Accession No. ML12240A307), as endorsed, with exceptions and clarifications, by NRC ISG JLD-ISG-2012-03 "Compliance with Order EA-12-051, Reliable Spent Fuel Pool Instrumentation," (ADAMS Accession No. ML12221A339) as providing one acceptable means of meeting the order requirements. Should the licensee propose an alternative strategy for compliance, additional staff review will be required to evaluate the alternative strategy in reference to the applicable order.

AUDIT ACTIVITIES

The onsite audit was conducted at the LaSalle facility from January 12, 2015, through January 15, 2015. The NRC audit team staff was as follows:

Title	Team Member	Organization
Team Lead/Project Manager	John Boska	NRR/JLD
Technical Support – Electrical	Kerby Scales	NRR/JLD
Technical Support – Reactor Systems	Jennifer Whitman	NRR/DSS
Technical Support – Balance of Plant	Michael Levine	NRR/JLD
Technical Support – Containment	Bruce Heida	NRR/JLD
Region III Observer	Julie Boettcher	NRC/Region III

The NRC staff executed the onsite portion of the audit per the three part approach discussed in the audit plan, to include conducting a tabletop discussion of the site's integrated mitigating strategies (MS) compliance program, a review of specific technical review items, and discussion of specific program topics. Activities that were planned to support the above included detailed analysis and calculation discussions, walk-throughs of strategies and equipment laydown, visualization of portable equipment storage and deployment, staging and deployment of offsite equipment, and physical sizing and placement of SFPI equipment.

AUDIT SUMMARY

1.0 Entrance Meeting (January 13, 2015)

At the audit entrance meeting, the NRC staff audit team introduced itself followed by introductions from the licensee's staff. The NRC audit team provided a brief overview of the audit's objectives and anticipated schedule.

2.0 Integrated Mitigating Strategies Compliance Program Overview

Per the audit plan and as an introduction to the site's program, the licensee provided a presentation to the NRC audit team describing the site's strategies to meet the NRC orders. The licensee reviewed its strategy to maintain core cooling, containment, and SFP cooling in the event of a BDBEE, and the plant modifications being done in order to implement the strategies. Also reviewed was the design and location of the storage facilities for the FLEX equipment, the interface with the National Strategic Alliance for FLEX Emergency Response (SAFER) Response Centers including staging areas, the spent fuel pool level indication modification, the

modifications planned to enhance emergency communications, procedural enhancements such as development of FLEX support guidelines (FSGs), and operator training.

3.0 Onsite Audit Technical Discussion Topics

Based on the audit plan, and with a particular emphasis on the Part 2 "Specific Technical Review Items," the NRC staff technical reviewers conducted interviews with licensee technical staff, site walk-downs, and detailed document review for the items listed in the plan. Results of these technical reviews and any additional review items needed from the licensee are documented in the audit item status table in Attachment 3, as discussed in the Conclusion section below.

3.1 Reactor Systems Technical Discussions and Walk-Downs

NRC staff met with licensee staff to discuss the amount of leakage from the reactor recirculation pump seals, the use of the Reactor Core Isolation Cooling (RCIC) system to maintain reactor pressure vessel (RPV) level, the availability of water sources, and the heatup of the suppression pool due to steam release from the RPV. NRC staff reviewed the analysis and flow calculations along with applicable procedures. The inspectors reviewed the licensee's strategy for utilizing raw water sources (the LaSalle lake), including water filtration and monitoring of core parameters to ensure adequate cooling. The inspectors also walked down the licensee's strategies and reviewed plant procedures for implementing the core cooling and makeup strategies.

3.2 Electrical Technical Discussions and Walk-Downs

- a. NRC staff reviewed the calculations on extending battery life based on load shedding, and walked down the battery rooms to evaluate strategies for hydrogen and temperature control. NRC staff also walked down panels used for load shedding to evaluate feasibility and timing.
- b. NRC staff walked down connection points and locations for FLEX electrical generators. In order to provide electrical power, two 480v FLEX generators (one for each reactor) will be moved from the main FLEX equipment storage building to the east side of the reactor building for each reactor, and temporary cables will be connected to new FLEX distribution panels which will allow energizing the 480v safety buses for each reactor. The staff reviewed the licensee's load and sizing calculations for the FLEX generators and did not identify any issues.

3.3 SFPI Technical Discussions and Walk-Downs

NRC staff walked down instrument, transmitter, electronics, and display locations for the SFP level instrumentation, along with the associated cable runs. No concerns were identified during the walkdown. NRC staff also reviewed the associated calibration, maintenance and test procedures for the SFP level instrumentation.

3.4 Other Technical Discussion Areas and Walk-Downs

- a. NRC staff toured the FLEX equipment storage buildings (FESBs) and reviewed the building plans. There are 3 FESBs. Two are designed to survive all site hazards. The FESB for the N+1 equipment is not protected from all hazards. The NRC staff expressed a concern that this was an alternative to the storage configurations listed in the NEI 12-06 guidance. The staff walked down equipment haul routes from the FESBs to the designated deployment sites, and walked down haul routes from designated staging areas for equipment that will be delivered from the National SAFER Response Center.
- b. NRC staff walked down the FLEX strategies for core cooling, RCS inventory, and SFP inventory functions. This included the point of deployment for the portable FLEX pumps, hose routing and deployment connection points (primary and alternate). One large FLEX pump will take a suction from the LaSalle lake and supply water to cool both reactors and both SFPs. A backup pump is available.
- c. NRC staff reviewed the strategy that will be implemented by the licensee to refuel the portable diesel-powered FLEX equipment. The NRC staff reviewed the instructions for refueling the equipment as well as the equipment needed to perform the refueling. Additionally, the staff reviewed the licensee's procedures for ensuring adequate fuel quality.
- d. The licensee's cooldown strategy relies on operation of the RPV safety relief valves (SRVs). The NRC staff reviewed the capability to operate the SRVs during an ELAP.
- e. The NRC staff reviewed the licensee's plans to ensure adequate communications, lighting, personnel access, and equipment access, to successfully implement the strategies. The staff interviewed plant personnel responsible for these areas, and observed lighting and communication needs during plant walkdowns.

4.0 Exit Meeting (January 15, 2015)

The NRC staff audit team conducted an exit meeting with licensee staff following the closure of onsite audit activities. The NRC staff highlighted items reviewed and noted that the results of the onsite audit trip will be documented in this report. There was only one open item at the conclusion of the audit and it was discussed at the exit meeting (see Attachment 3 for additional information):

- a. ISE CI 3.1.3.1.A, Design of FLEX Storage Buildings
The FLEX storage building configuration is an alternative to the guidance contained in NEI 12-06. This configuration is a design that is used at most Exelon plants. The NRC staff previously discussed this with Exelon following the NRC FLEX audit at Byron Station. The NRC staff notes that it may not be a concern when the first reactor at the site reaches its compliance date, since there should be sufficient FLEX equipment in the robust FESBs. However, it will be a concern when the second reactor reaches its compliance date. The NRC is pursuing a resolution with the licensee.

CONCLUSION

The NRC staff completed all three parts of the onsite audit plan. Each audit item listed in Part 2 of the plan was reviewed by NRC staff members while on site. In addition to the list of NRC and licensee onsite audit staff participants in Attachment 1, Attachment 2 provides a list of documents reviewed during the onsite audit portion.

In support of the continuing audit process as the licensee proceeds towards orders compliance for this site, Attachment 3 provides the status of all open audit review items that the NRC staff is evaluating in anticipation of issuance of a combined safety evaluation for both the Mitigation Strategies and Spent Fuel Pool Instrumentation orders. The five sources for the audit items referenced below are as follows:

- a. Interim Staff Evaluation (ISE) Open Items (OIs) and Confirmatory Items (CIs)
- b. Audit Questions (AQs)
- c. Licensee-identified Overall Integrated Plan (OIP) Open Items (OIs)
- d. SFPI Requests for Additional Information (RAIs)
- e. Additional information needed to support the Safety Evaluation (SE)

The attachments provide audit information as follows:

- a. Attachment 1: List of NRC staff and licensee staff audit participants
- b. Attachment 2: List of documents reviewed during the onsite audit
- c. Attachment 3: MS/SFPI SE Audit Items currently under NRC staff review (licensee input needed as noted)

While this report notes the completion of the onsite portion of the audit per the audit plan dated December 9, 2014, the ongoing audit process continues as per the letters dated August 28, 2013, and March 26, 2014, to all licensees and construction permit holders for both orders.

Additionally, while Attachment 3 provides a list of currently open items, the status and progress of the NRC staff's review may change based on licensee plan changes, resolution of generic issues, and other NRC staff concerns not previously documented. Changes in the NRC staff review will be communicated in the ongoing audit process.

Attachments:

1. NRC and Licensee Staff Onsite Audit Participants
2. Onsite Audit Documents Reviewed
3. MS/SFPI Audit Items currently under NRC staff review

Onsite Audit Participants

NRC Staff:

John Boska	NRR/JLD/JOMB
Kerby Scales	NRR/JLD/JERB
Jennifer Whitman	NRR/DSS/SRXB

Bruce Heida	NRR/JLD/JCBB
Julie Boettcher	NRC/Region III
Michael Levine	NRR/JLD/JCBB

LaSalle Staff:

Larry Blunk	Regulatory Assurance
Mike FitzPatrick	Operations
Bill Collins	Operations
Christopher Smith	Operations
Paul West	Operations
Scott Klee	Operations
Kevin Berta	Engineering
Wes Keller	Engineering
Sean Tanton	Engineering
Joe Prostko	Engineering (SFPI)
George Kelly	Engineering (SFPI)
Phillip Amway	Corporate
Steve Pearson	Corporate
Leslie Holden	Corporate (EP, Communications)
Danny Brush	Corporate (EP, Communications)
Don Carpenter	Corporate (EP, Communications)

Documents Reviewed

- Engineering Change EC 396060, "FLEX Primary Strategy – Mechanical"
- Engineering Change EC 396069, "FLEX Primary Strategy – Electrical," Rev. 1
- Engineering Change EC 396092, "Unit 2 FLEX Alternate Strategy – Electrical"
- Engineering Change EC 397688, "Hardened FLEX Building Inside PA"
- Engineering Change EC 397689, "Hardened FLEX Building Outside PA"
- Engineering Change EC 397690, "Commercial FLEX Building Inside PA"
- Engineering Change EC 392331, "RCIC Room Temperature," Rev. 0
- L-004000, "Evaluation of Liquefaction Potential for BDBEE [beyond-design-basis external event] FLEX Staging Area and Equipment Deployment Paths," Rev. 0
- L-003961 "FLEX Pump Sizing Hydraulic Calculation," Rev. 0
- L-003969, "U1/U2 Transient Heat-Up Analysis for the Control Room, AEERs, Div. 1 and Div. 2 Switchgear Rooms following a BDBEE," Rev. 0
- L-003263, "Volume Requirements for ADS Back-up Compressed Gas System (Bottle Banks)," Rev. 3
- L-003447, "LaSalle Units 1 and 2, 125VDC System Analysis," Rev. 1
- L-003448, "LaSalle Units 1 and 2, 250VDC System Analysis," Rev. 1
- LS-MISC-025, "Use of MAAP in Support of FLEX Implementation," Rev. 1
- Drawing 1E-2-4100, Sheet 1, "Single Line Diagram Unit-2 FLEX Primary Power Distribution," Rev. A
- Drawing 1E-2-4100, Sheet 2, "Single Line Diagram Unit-2 FLEX Alternate Power Distribution," Rev. A
- Drawing 1E-2-4005DL, "Schematic Diagram Auxiliary Power System AP Part 83," Rev. 0
- Drawing 1E-2-4005DP, "Schematic Diagram Auxiliary Power System AP Part 86," Rev. 0
- Drawing 1E-2-4005DR, "Schematic Diagram Auxiliary Power System AP Part 88," Rev. A
- Drawing 1E-2-4000FB, "Key Diagram 125V DC Distribution ESS. Div. 1," Rev. N
- Drawing 1E-2-4000FC, "Key Diagram 125V DC Distribution ESS. Div. 2," Rev. O
- Drawing 1E-2-4000FD, "Key Diagram 125V DC Distribution ESS. Div. 3," Rev. N
- Drawing 1E-2-4000N, "Station Key Diagram 480V Switchgears Part 1," Rev. M
- Drawing 1E-2-4000P, "Station Key Diagram 480V Switch Gears Part 2," Rev. J
- Drawing 1E-2-4000BN, "Key Diagram 480V Switchgear 235X," Rev. C
- Drawing 1E-2-4000BP, "Key Diagram 480V Switchgear 235Y," Rev. F
- Drawing 1E-2-4000BQ, "Key Diagram 480V Switchgear 236X," Rev. C
- Drawing 1E-2-4000BR, "Key Diagram 480V Switchgear 236Y," Rev. L
- Drawing 1E-2-4448AA, "Wiring Diagram FLEX Primary Feed Distribution Panel," Rev. M
- CC-LA-118-1001, "Site Implementation of Diverse and Flexible Coping Strategies (FLEX) and Spent Fuel Pool Instrumentation Program," (Draft)
- LOA-FSG-001, "Loss of Vital Instrumentation," (Draft)
- LOA-FSG-002, "FLEX Electrical Strategy," (Draft)

- LOA-FSG-003, "FLEX Water Supply Strategy," (Draft)
- LOA-FSG-004, "FLEX Implementation During Shutdown/Refuel Modes," (Draft)
- LOA-FSG-005, "Area Ventilation," (Draft)
- LOA-FSG-006, "Area Lighting," (Draft)
- LOA-FSG-007, "FLEX Spent Fuel Pool Level Indication," (Draft)
- LOA-FSG-008, "Overhead Lines," (Draft)
- LOA-FSG-009, "FLEX Equipment Refueling," (Draft)
- LOA-FSG-010, "FLEX Communications," (Draft)
- LOA-FSG-011, "BDBEE Guidance," (Draft)
- LOA-FSG-012, "FLEX Deployment Path Debris Removal," (Draft)
- LOA-FSG-013, "FLEX Recovery Actions," (Draft)
- LOA-AP-201, "AC Power System Abnormal," Rev. 41
- LOA-IN-201, "Drywell Pneumatic Supply for SRVs"
- LGA-RI-201, "Unit 2 Alternate Vessel Injection Using RCIC Including Defeat of RCIC Isolation."
- LGA-RI-203, "Unit 2 RPV Injection Using RCIC When Loss of DC is Imminent or Has Occurred"
- LIP-FC-501, "Calibration of Wide Range SFP Level," (Draft)
- LIP-FC-601, "Functional Test of Wide Range SFP Level," (Draft)
- FSG-TP-00141, "Test Procedure IP4000DIM-TCL Pump Performance"
- OU-AA-103, "Shutdown Safety Management Program," Rev. 15
- EP-AA-112-100-F-01, "Shift Emergency Director Checklist"
- EP-AA-112-400-F-01, "Nuclear Duty Officer Checklist"
- EP-AA-112-400-F-04, "EOF Logistics Manager Checklist," Rev. K
- AREVA Document No. 51-9233422, "LaSalle County Nuclear Generating Station SAFER Response Plan," Rev. 0, 12/19/14

Mitigation Strategies/Spent Fuel Pool Instrumentation Safety Evaluation Audit Items:

Audit Items Currently Under NRC Staff Review, Requiring Licensee Input As Noted

Audit Item Reference	Item Description	Licensee Input Needed
ISE CI 3.1.3.1.A	Configuration of FLEX storage buildings: The current LaSalle configuration is to have one main FLEX storage building, robust against all site hazards, containing an N set of FLEX equipment except for the FLEX pumps, another robust FLEX storage building near the intake canal with the two FLEX pumps, and a commercial (non-robust) FLEX building with the N+1 equipment.	This configuration is an alternative to the guidance contained in NEI 12-06. Further consideration of the LaSalle FLEX storage configuration by the NRC requires that the licensee propose this configuration as an alternative to the guidance of NEI 12-06, accompanied with appropriate justification.

B. Hanson

- 3 -

If you have any questions, please contact me at 301-415-2901 or by e-mail at John.Boska@nrc.gov.

Sincerely,

/RA/

John P. Boska, Senior Project Manager
Orders Management Branch
Japan Lessons-Learned Division
Office of Nuclear Reactor Regulation

Docket Nos.: 50-373 and 50-374

Enclosure:
Audit report

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