Exelon Generation®

Order No. EA-13-109

RS-17-065

June 29, 2017

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

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

Subject: Sixth Six-Month Status Report For Phases 1 and 2 Overall Integrated Plan in Response to June 6, 2013 Commission Order Modifying Licenses with Regard to Reliable Hardened Containment Vents Capable of Operation Under Severe Accident Conditions (Order Number EA-13-109)

References:

1. NRC Order Number EA-13-109, "Issuance of Order to Modify Licenses with Regard to Reliable Hardened Containment Vents Capable of Operation Under Severe Accident Conditions," dated June 6, 2013
2. NRC Interim Staff Guidance JLD-ISG-2013-02, "Compliance with Order EA-13-109, Order Modifying Licenses with Regard to Reliable Hardened Containment Vents Capable of Operation under Severe Accident Conditions", Revision 0, dated November 14, 2013
3. NRC Interim Staff Guidance JLD-ISG-2015-01, "Compliance with Phase 2 Order EA-13-109, Order Modifying Licenses with Regard to Reliable Hardened Containment Vents Capable of Operation under Severe Accident Conditions", Revision 0, dated April 2015
4. NEI 13-02, "Industry Guidance for Compliance With Order EA-13-109, BWR Mark I & II Reliable Hardened Containment Vents Capable of Operation Under Severe Accident Conditions", Revision 1, dated April 2015
5. Exelon Generation Company, LLC's Answer to June 6, 2013, Commission Order Modifying Licenses with Regard to Reliable Hardened Containment Vents Capable of Operation Under Severe Accident Conditions (Order Number EA-13-109), dated June 26, 2013
6. Exelon Generation Company, LLC Phase 1 Overall Integrated Plan in Response to June 6, 2013 Commission Order Modifying Licenses with Regard to Reliable Hardened Containment Vents Capable of Operation Under Severe Accident Conditions (Order Number EA-13-109), dated June 30, 2014 (RS-14-059)
7. Exelon Generation Company, LLC First Six-Month Status Report Phase 1 Overall Integrated Plan in Response to June 6, 2013 Commission Order Modifying Licenses with Regard to Reliable Hardened Containment Vents Capable of Operation Under Severe Accident Conditions (Order Number EA-13-109), dated December 17, 2014 (RS-14-303)
8. Exelon Generation Company, LLC Second Six-Month Status Report Phase 1 Overall Integrated Plan in Response to June 6, 2013 Commission Order Modifying Licenses with Regard to Reliable Hardened Containment Vents Capable of Operation Under Severe Accident Conditions (Order Number EA-13-109), dated June 30, 2015 (RS-15-149)

9. Exelon Generation Company, LLC Phase 1 (Updated) and Phase 2 Overall Integrated Plan in Response to June 6, 2013 Commission Order Modifying Licenses with Regard to Reliable Hardened Containment Vents Capable of Operation Under Severe Accident Conditions (Order Number EA-13-109), dated December 16, 2015 (RS-15-300)
10. Exelon Generation Company, LLC Fourth Six-Month Status Report For Phases 1 and 2 Overall Integrated Plan in Response to June 6, 2013 Commission Order Modifying Licenses with Regard to Reliable Hardened Containment Vents Capable of Operation Under Severe Accident Conditions (Order Number EA-13-109), dated June 30, 2016 (RS-16-107)
11. Exelon Generation Company, LLC Fifth Six-Month Status Report For Phases 1 and 2 Overall Integrated Plan in Response to June 6, 2013 Commission Order Modifying Licenses with Regard to Reliable Hardened Containment Vents Capable of Operation Under Severe Accident Conditions (Order Number EA-13-109), dated December 14, 2016 (RS-16-233)
12. NRC letter to Exelon Generation Company, LLC, LaSalle County Station, Units 1 and 2 – Interim Staff Evaluation Relating to Overall Integrated Plan in Response to Phase 1 of Order EA-13-109 (Severe Accident Capable Hardened Vents) (TAC Nos. MF4456 and MF4457), dated March 31, 2015
13. NRC letter to Exelon Generation Company, LLC, LaSalle County Station, Units 1 and 2 – Interim Staff Evaluation Relating to Overall Integrated Plan in Response to Phase 2 of Order EA-13-109 (Severe Accident Capable Hardened Vents) (TAC Nos. MF4456 and MF4457), dated August 2, 2016

On June 6, 2013, the Nuclear Regulatory Commission ("NRC" or "Commission") issued an Order (Reference 1) to Exelon Generation Company, LLC (EGC). Reference 1 was immediately effective and directs EGC to require their BWRs with Mark I and Mark II containments to take certain actions to ensure that these facilities have a hardened containment vent system (HCVS) to remove decay heat from the containment, and maintain control of containment pressure within acceptable limits following events that result in loss of active containment heat removal capability while maintaining the capability to operate under severe accident (SA) conditions resulting from an Extended Loss of AC Power (ELAP). Specific requirements are outlined in Attachment 2 of Reference 1.

Reference 1 required submission of an Overall Integrated Plan (OIP) by June 30, 2014 for Phase 1 of the Order, and an OIP by December 31, 2015 for Phase 2 of the Order. The interim staff guidance (References 2 and 3) provide direction regarding the content of the OIP for Phase 1 and Phase 2. Reference 3 endorses industry guidance document NEI 13-02, Revision 1 (Reference 4) with clarifications and exceptions identified in References 2 and 3. Reference 5 provided the EGC initial response regarding reliable hardened containment vents capable of operation under severe accident conditions. Reference 6 provided the LaSalle County Station, Units 1 and 2, Phase 1 OIP pursuant to Section IV, Condition D.1 of Reference 1. References 7 and 8 provided the first and second six-month status reports pursuant to Section IV, Condition D.3 of Reference 1 for LaSalle County Station. Reference 9 provided the LaSalle County Station, Units 1 and 2, Phase 1 updated and Phase 2 OIP pursuant to Section IV, Conditions D.2 and D.3 of Reference 1. References 10 and 11 provided the fourth and fifth six-month status reports pursuant to Section IV, Condition D.3 of Reference 1 for LaSalle County Station.

The purpose of this letter is to provide the sixth six-month update report for Phases 1 and 2, pursuant to Section IV, Condition D.3 of Reference 1, that delineates progress made in implementing the requirements of Reference 1 for LaSalle County Station, Units 1 and 2. The enclosed report provides an update of milestone accomplishments since the last status report, including any changes to the compliance method, schedule, or need for relief and the basis, if any. The enclosed report also addresses the NRC Interim Staff Evaluation open items contained in References 12 and 13.

This letter contains no new regulatory commitments. If you have any questions regarding this report, please contact David J. Distel at 610-765-5517.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 29th day of June 2017.

Respectfully submitted,

David M. Gullott
Manager - Licensing
Exelon Generation Company, LLC

Enclosure:

LaSalle County Station, Units 1 and 2 Sixth Six-Month Status Report for Phases 1 and 2 Implementation of Order EA-13-109, Order Modifying Licenses with Regard to Reliable Hardened Containment Vents Capable of Operation Under Severe Accident Conditions

cc: Director, Office of Nuclear Reactor Regulation
NRC Regional Administrator - Region III
NRC Senior Resident Inspector - LaSalle County Station
NRC Project Manager, NRR - LaSalle County Station
Mr. Raj Auluck, NRR/JLD/TSD/JCBB, NRC
Mr. Brian E. Lee, NRR/JLD/JCBB, NRC
Mr. John P. Boska, NRR/JLD/JOMB, NRC
Illinois Emergency Management Agency - Division of Nuclear Safety

Enclosure

LaSalle County Station, Units 1 and 2

Sixth Six-Month Status Report for Phases 1 and 2 Implementation of Order EA-13-109, Order Modifying Licenses with Regard to Reliable Hardened Containment Vents Capable of Operation Under Severe Accident Conditions

(19 pages)

COMBINED PHASES 1 AND 2 SIX MONTH UPDATE

Enclosure

LaSalle's Sixth Six Month Status Report for the Implementation of Order EA-13-109, "Order Modifying Licenses with Regard to Reliable Hardened Containment Vents Capable of Operation under Severe Accident Conditions"

1 Introduction

LaSalle developed an Overall Integrated Plan (Reference 1), documenting the installation of a Hardened Containment Vent System (HCVS) that provides a reliable hardened venting capability for pre-core damage and under severe accident conditions, including those involving a breach of the reactor vessel by molten core debris, in response to NRC Order EA-13-109 (Reference 2). Updates of milestone accomplishments are based on the combined Phases 1 and 2 Overall Integrated Plan (Reference 7), documenting:

1. The installation of a Hardened Containment Vent System (HCVS) that provides a reliable hardened venting capability for pre-core damage and under severe accident conditions, including those involving a breach of the reactor vessel by molten core debris, in response to Reference 2.
2. An alternative venting strategy that makes it unlikely that a drywell vent is needed to protect the containment from overpressure related failure under severe accident conditions, including those that involve a breach of the reactor vessel by molten core debris, in response to Reference 2.

This enclosure provides an update of milestone accomplishments since submittal of the latest status report, including any changes to the compliance method, schedule, or need for relief/relaxation and the basis, if any.

2 Milestone Accomplishments

The following milestone(s) have been completed since November 11, 2016, and are current as of June 1, 2017:

- Sixth Six-Month Update (complete with this submittal)
- Phase 1 Unit 2 HCVS Implementation
- Phase 1 Unit 1 Begin Online Installation
- Phase 2 Unit 1 Begin Detailed Design

3 Milestone Schedule Status

The following provides an update to Attachment 2 of the combined Phases 1 and 2 Overall Integrated Plan. It provides the activity status of each item, and whether the expected completion date has changed. The dates are planning dates subject to change as design and implementation details are developed.

The revised milestone target completion dates do not impact the order implementation date.

Milestone	Target Completion Date	Activity Status	Comments
Phases 1 and 2 HCVS Milestone Table			
Submit Phase 1 Overall Integrated Plan	**Jun 2014**	Complete	
Submit 6 Month Updates			
Update 1	**Dec 2014**	Complete	
Update 2	**Jun 2015**	Complete	
Update 3 and Phase 2 Overall Integrated Plan	**Dec 2015**	Complete	
Update 4	**Jun 2016**	Complete	
Update 5	**Dec 2016**	Complete	
Update 6	**Jun 2017**	Complete	This submittal
Update 7	**Dec 2017**	Not Started	
Update 8	**Jun 2018**	Not Started	
Update 9	**Dec 2018**	Not Started	
Phase 1 Specific Milestones			
Phase 1 Unit 2 Modifications			
Begin Conceptual Design	**Jun 2014**	Complete	
Complete Conceptual Design	**Jun 2014**	Complete	
Begin Detailed Design	**Jun 2015**	Complete	
Complete Detailed Design and Issue Modification Package	**Nov 2016**	Complete	
Begin Online Installation	**Jun 2016**	Complete	

Milestone	Target Completion Date	Activity Status	Comments
Phases 1 and 2 HCVS Milestone Table			
Complete Online Installation	**Feb 2017**	Complete	
Begin Outage Installation	**Feb 2017**	Complete	
Complete Outage Installation and put system into service	**Mar 2017**	Complete	
Phase 1 Unit 2 Procedure Changes			
Operations Procedures Developed	**Dec 2016**	Complete	
Maintenance Procedures Developed	**Dec 2016**	Complete	
Procedure Changes Active	**Mar 2017**	Complete	
Phase 1 Unit 2 Training			
Training Complete	**Dec 2016**	Complete	
Phase 1 Unit 2 Completion			
Unit 2 HCVS Phase 1 Implementation	**Mar 2017**	Complete	
Phase 1 Unit 1 Modifications			
Begin Conceptual Design	**Jun 2014**	Complete	
Complete Conceptual Design	**Jun 2014**	Complete	
Begin Detailed Design	**Jun 2015**	Complete	
Complete Detailed Design and Issue Modification Package	**Mar 2017**	Started	New target: Aug 2017 based on revising the design for tying-in to primary containment

Milestone	Target Completion Date	Activity Status	Comments
Phases 1 and 2 HCVS Milestone Table			
Begin Online Installation	**May 2017**	Complete	
Complete Online Installation	**Feb 2018**	Started	
Begin Outage Installation	**Feb 2018**	Not Started	
Complete Outage Installation and put system into service	**Mar 2018**	Not Started	
Phase 1 Unit 1 Procedure Changes			
Operations Procedures Developed	**Dec 2017**	Started	
Maintenance Procedures Developed	**Dec 2017**	Started	
Procedure Changes Active	**Mar 2018**	Not Started	
Phase 1 Unit 1 Training			
Training Complete	**Dec 2017**	Started	
Phase 1 Completion			
Phase 1 Unit 1 Implementation	**Mar 2018**	Not Started	
Phase 2 Specific Milestones			
Phase 2 Unit 1 Modifications			
Begin Conceptual Design	**Jun 2015**	Complete	
Complete Conceptual Design	**Jun 2015**	Complete	

Milestone	Target Completion Date	Activity Status	Comments
Phases 1 and 2 HCVS Milestone Table			
Begin Detailed Design	**Jun 2016**	Complete	Completed Mar 2017 due to Phase 1 detailed design and installation
Complete Detailed Design and Issue Modification Package	**Mar 2017**	Started	New target: Aug 2017 due to movement of the start of detailed design
Begin Online Installation	**May 2017**	Not Started	New target: Aug 2017 based on completion of detailed design
Complete Online Installation	**Feb 2018**	Not Started	
Begin Outage Installation	**Feb 2018**	Not Started	No outage work required
Complete Outage Installation and put system into service	**Mar 2018**	Not Started	No outage work required
Phase 2 Unit 1 Procedure Changes			
Operations Procedures Developed	**Dec 2017**	Not Started	
Maintenance Procedures Developed	**Dec 2017**	Not Started	
Procedure Changes Active	**Mar 2018**	Not Started	
Phase 2 Unit 1 Training			
Training Complete	**Dec 2017**	Not Started	
Phase 2 Unit 1 Completion			
Phase 2 Unit 1 Implementation	**Mar 2018**	Not Started	
Submit Unit 1 Phases	**May 2018**	Not Started	

Milestone	Target Completion Date	Activity Status	Comments
Phases 1 and 2 HCVS Milestone Table			
1 & 2 Full Compliance Report			
Phase 2 Unit 2 Modifications			
Begin Conceptual Design	**Jun 2015**	Complete	
Complete Conceptual Design	**Jun 2015**	Complete	
Begin Detailed Design	**Jun 2017**	Not Started	New Target: Feb 2018 following completion of Unit 1 detailed design
Complete Detailed Design and Issue Modification Package	**Mar 2018**	Not Started	New Target: Aug 2018 due to movement of the start of detailed design
Begin Online Installation	**May 2018**	Not Started	New Target: Aug 2018 based on completion of detailed design
Complete Online Installation	**Feb 2019**	Not Started	
Begin Outage Installation	**Feb 2019**	Not Started	No outage work required
Complete Outage Installation and put system into service	**Mar 2019**	Not Started	No outage work required
Phase 2 Unit 2 Procedure Changes			
Operations Procedures Developed	**Dec 2018**	Not Started	
Maintenance Procedures Developed	**Dec 2018**	Not Started	
Procedure Changes	**Mar 2019**	Not Started	

Milestone	Target Completion Date	Activity Status	Comments
Phases 1 and 2 HCVS Milestone Table			
Active			
Phase 2 Unit 2 Training			
Training Complete	**Dec 2018**	Not Started	
Phase 2 Completion			
Phase 2 Unit 2 Implementation	**Mar 2019**	Not Started	
Submit Unit 2 Phases 1 & 2 Full Compliance Report	**May 2019**	Not Started	

4 Changes to Compliance Method

1. Rather than "as close as possible" (Ref. 7, pg. 14), the PCIVs will be located "as close as reasonably possible" (Ref. 3, Section 4.1.2.1.2) to the penetration into primary containment. (Ref. 9, Drawing M-959 Sheet 4)
2. The motive gas supply to the PCIVs will be nitrogen, not argon. (Ref. 7, pg. 10 & 15; Ref. 9, Design Considerations Summary (DCS) 4.1.33)
3. Downstream of the outboard PCIV, the piping classification changes from Safety Related to Non-Safety Related and Seismically Supported (i.e., Augmented Quality) (including the rupture disc). This is similar to safety classification changes for the existing Containment Vent & Purge System where piping downstream of the outboard PCIV is Seismically Supported and Non-Safety Related and then penetrates through Secondary Containment. This includes argon and nitrogen tubing. (Ref. 7, pg. 17; Ref. 9, DCS Sec. 4.1.4.2)
4. HCVS leak-off path isolation will be via pilot-operated 2-way valve located in the Reactor Building. The pneumatic pilot taps into the nitrogen supply to the upstream PCIV actuator, closing the leak-off pathway simultaneously with opening the upstream PCIV. Thus, it will not require separate manual action. From Table 2-1 of Reference 7 (pg. 10), Primary Action 2 is combined with opening the upstream PCIV and inserted between Primary Actions 4 and 5 in sequence, prior to breaching the rupture disc with argon. Primary Action 6 will be reduced to opening and closing the downstream PCIV to cycle the vent. (Ref. 9, Dwg. M-138 Sheet 3)

5. Radiation shielding for the FLEX pump or generator deployment locations is not required; the dose rates at the FLEX pump deployment locations are low enough for personnel habitability without shielding, and the FLEX generators are relocated to take advantage of shielding provided by the Reactor Building itself. (Ref. 7, pg. 28; procedure LOA-FSG-002, Attachments B1, B2, and I; calculation L-004151)

5 Need for Relief/Relaxation and Basis for the Relief/Relaxation

LaSalle expects to comply with the order implementation date and no relief/relaxation is required at this time.

6 Open Items from Combined Phase 1 and 2 Overall Integrated Plan and Interim Staff Evaluations

The following tables provide a summary of the open items documented in the combined Phase 1 and 2 Overall Integrated Plan or the Interim Staff Evaluation (ISE) and the status of each item.

Combined Phases 1 and 2 OIP Open Items		Status
Phase 1 Open Items		
7	Perform radiological evaluation for Phase 1 vent line impact on ERO actions.	Complete. LaSalle calculation L-004151 determines peak dose rates at FLEX and HCVS Phase 2 activity locations. Adjustments have been made to either the timing or location of actions to manage dose below 5 REM to any individual performing ERO actions in most cases, with a small number of actions potentially greater than 5 REM, but not exceeding 10 REM. The estimated dose is based on peak dose rates from LaSalle calculation L-004151, determined from a combination of all source term locations, and is a very conservative estimate. There is considerable margin to the maximum emergency response exposure guideline of 25 REM to any one individual performing ERO actions. L-004151 is available on ePortal.

Combined Phases 1 and 2 OIP Open Items		Status
Phase 2 Open Items		
1	Evaluate feasibility of strategy due to radiological conditions.	Started. LaSalle calculation L-004151 indicates that the affected Reactor Building will be uninhabitable 1 hour after the ELAP due to core damage. As a result, the hose connection point on elevation 710' will be relocated from the Reactor Building to the Diesel Corridor, and order of activities changed so that the hose connections on elevation 761' in the Reactor Building are made within the first hour after the ELAP. Dose rates at the FLEX/SAWA pump location are low enough that additional shielding is not required. Refueling strategies and other exterior actions will be adjusted as necessary based on actual event conditions. L-004151 is available on ePortal.
2	Verify required modifications to support SAWA/SAWM.	Started

No.	Phase 1 Interim Staff Evaluation Open Item	Status
1	Make available for NRC staff audit documentation of a method to disable HCVS during normal operation to provide assurances against inadvertent operation that also minimizes actions to enable HCVS operation following an ELAP.	Complete for Unit 2. The motive and purge gas systems will be isolated by at least one locked-closed manual valve in each system during normal operation. Main Control Room (MCR) controls will be via key-locked switches with power normally de-energized. PCIVs are air-to-open, spring/fail closed. Ref. 9 (DCS 4.1.19, 4.1.33, 4.1.35, 4.1.36) and procedure LGA-VQ-202 provide direction for these actions and are available on ePortal. In-progress for Unit 1 following the concept described for Unit 2, above.

2	Make available for NRC staff audit the final sizing evaluation for HCVS batteries/battery charger including incorporation into FLEX DG loading calculation.	Complete for Unit 2. Calculation L-004114 performs the sizing evaluation of the common HCVS batteries and associated charger. The results show a margin of approximately 7% after 24 hours with all Unit 1 and Unit 2 HCVS loads drawing maximum current. The FLEX DG loading evaluations in ECs 396062 (DCS 4.1.35) and 396069 (DCS 4.1.35) show a margin on the more limited DG of 337 amps for future loads. The HCVS battery charger rated input current is 8 amps per Ref. 9 (DCS 4.1.35). Therefore, there is sufficient margin in either FLEX DG to power the HCVS battery charger. L-004114, the Design Consideration Summaries (DCSs) of the final revisions of ECs 396062 and 396069, and Ref. 9 are available on ePortal. In-progress for Unit 1. As the battery is common to both units, Unit 1 detailed design needs only to verify battery loads are within those assumed in L-004114.
3	Make available for NRC staff audit documentation of the HCVS argon pneumatic system design including sizing and location.	Complete for Unit 2. Pneumatic system motive force changed to nitrogen; see Section 4 of this document, Ref. 9 (DCS 4.1.33), and calculation L-004117. L-004117 and Ref. 9 are available on ePortal. In-progress for Unit 1; design will follow the same concept as Unit 2.
4	Make available for NRC staff audit an evaluation of temperature and radiological conditions to ensure that operating personnel can safely access and operate controls and support equipment.	Complete for Unit 2. The radiological evaluation in calculation L-004115 and temperature evaluation in EC 392353 (Ref. 9, DCS 4.1.14) show no additional shielding or high temperature mitigation is required to safely access and operate controls and equipment. L-004115 and Ref. 9 are available on ePortal. In-progress for Unit 1; as Unit 1 design will follow the same concept as Unit 2, habitability evaluations are expected to be similar.

5	Make available for NRC staff audit analyses demonstrating that HCVS has the capacity to vent the steam/energy equivalent of one percent of licensed/rated thermal power (unless a lower value is justified), and that the suppression pool and the HCVS together are able to absorb and reject decay heat, such that following a reactor shutdown from full power containment pressure is restored and then maintained below the primary containment design pressure and the primary containment pressure limit.	Complete for Unit 2. Calculation L-004097 shows that the HCVS has the capacity to vent the steam/energy equivalent of 1% of rated thermal power while maintaining containment pressure below containment design pressure and PCPL. L-004097 is available on ePortal. In-progress for Unit 1; design will follow the same concept as Unit 2.
6	Make available for NRC staff audit the seismic and tornado missile final design criteria for the HCVS stack.	Complete. LaSalle design complies with the reasonable tornado protection criteria of Reference 6. The seismic and tornado missile protection design is described in Ref. 9 (DCS 4.1.38) and evaluated in calculation L-004092. Ref. 9 and L-004092 are available on ePortal.

7	Make available for NRC staff audit the descriptions of local conditions (temperature, radiation and humidity) anticipated during ELAP and severe accident for the components (valves, instrumentation, sensors, transmitters, indicators, electronics, control devices, etc.) required for HCVS venting including confirmation that the components are capable of performing their functions during ELAP and severe accident conditions.	Complete for Unit 2. Reference 9 (DCS 4.1.14) includes the temperature and humidity evaluations and calculation L-004115 evaluates the radiological conditions. Both documents are available on ePortal. In-progress for Unit 1; as Unit 1 design will follow the same concept as Unit 2, component environmental conditions are expected to be similar.
8	Make available for NRC staff audit documentation that demonstrates adequate communication between the remote HCVS operation locations and HCVS decision makers during ELAP and severe accident conditions.	Complete. FLEX communications strategies and equipment (as described in procedure LOA-FSG-010) will be utilized for HCVS. These methods are adequate for HCVS implementation. LOA-FSG-010 is available on ePortal.
9	Provide a description of the final design of the HCVS to address hydrogen detonation and deflagration.	Complete for Unit 2. An argon purge system is provided which is designed to purge the vent piping of a detonable mixture of hydrogen and oxygen after each vent cycle. Installed capacity is provided for the first 24 hours after ELAP, and additional argon bottles are stored in a FLEX building to continue operation past 24 hours. Reference calculation L-004137 and Ref. 9 (DCS 4.1.33), available on ePortal. In-progress for Unit 1; design will follow the same concept as Unit 2.

10	Provide a description of the strategies for hydrogen control that minimizes the potential for hydrogen gas migration and ingress into the reactor building or other buildings.	Complete. LaSalle wetwell vent line has a dedicated HCVS flowpath from the wetwell penetration to the outside with no interconnected system. The discharge point meets the guidance of HCVS-FAQ-04 (Att. J of Reference 3). See Ref. 9 (Dwg. M-138 Sheet 3), available on ePortal.
11	Make available for NRC staff audit documentation of a seismic qualification evaluation of HCVS components.	Complete for Unit 2. See calculations L-003953, L-004138 through L-004146, L-004161 through L-004166. All above calculations are available on ePortal. In-progress for Unit 1; design will follow the same concept as Unit 2.

<table>
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<td>12</td>
<td>Make available for NRC staff audit descriptions of all instrumentation and controls (existing and planned) necessary to implement this order including qualification methods.</td>
<td>Complete for Unit 2; Unit 1 design will follow the same concept as Unit 2.

New instrumentation and controls are described in Reference 9 (DCS 4.1.36), and qualification methods are per calculations shown in the table below. All referenced documents are available on ePortal.

<table>
<tr><th>New Instruments</th><th>Qualification Method Reference Calculations</th></tr>
<tr><td>HCVS Temperature (2TE-PC310, 2TT-PC311)</td><td>IEEE 344-1975/1987
L-004161
L-004166</td></tr>
<tr><td>HCVS Radiation (2RE-PC320, 2RT-PC321)</td><td>IEEE 344-1975
L-004139
L-004166</td></tr>
<tr><td>HCVS PCIV Position Indication</td><td>IEEE 344-1975
L-004140</td></tr>
<tr><td>HCVS Pneumatic Supply Pressure (2PI-PC450)</td><td>IEEE 344-1975
L-004143</td></tr>
<tr><td>HCVS Purge Supply Pressure (2PI-PC545, 2PT-PC546)</td><td>IEEE 344-1975
L-004143
L-004141</td></tr>
<tr><td>HCVS Electrical Supply Availability (0DC51E)</td><td>IEEE 344-1975
L-004138</td></tr>
<tr><td>HCVS Controls (0PM08J, manual valves)</td><td>IEEE 344-1975
L-004146
L-004143</td></tr>
</table>

Existing instruments relied upon for initiation, operation, and monitoring of HCVS are qualified or evaluated to Regulatory Guide 1.97 and include the following: Drywell pressure (1(2)PI-CM029), Wetwell pressure (1(2)PI-CM056), Wetwell level (1(2)LI-CM192), Wetwell water temperature (1(2)TI-CM037), and Reactor pressure (1(2)C61-R011). (Ref. 9, DCS 4.1.14)</td>
</tr>
</table>

13	Make available for NRC staff audit the procedures for HCVS operation.	Complete for Unit 2. Procedures LGA-VQ-202 and LOP-PC-09 contain all instructions for operation of the HCVS. Above procedures are available on ePortal. In-progress for Unit 1; design will follow the same concept as Unit 2.
	Phase 2 Interim Staff Evaluation Open Item	**Status**
1	Licensee to confirm through analysis the temperature and radiological conditions to ensure that operating personnel can safely access and operate controls and support equipment. (ISE Section 3.3.1)	Started. Actions taken within the first hour (prior to start of core damage) from the start of the ELAP are acceptable from an environmental and radiological perspective without further evaluation. Actions performed within the MCR are acceptable for the entire period of Sustained Operation per HCVS-FAQ-06 Assumption 049-21. For actions within the Reactor Building and between 1 and 7 hours, a quantitative evaluation of expected dose rates has been performed per HCVS-FAQ-12 and found the dose rates at deployment locations including ingress/egress paths are acceptable. See calculation L-004151, available on ePortal. Note that no actions in the Reactor Building are planned for the unit in a severe accident after the first hour post-ELAP. For ingress and egress paths outside the Reactor Building between 7 hours and 7 days, when SAWA is being utilized, a quantitative evaluation of expected dose rates has been performed per HCVS-WP-02 and found the dose rates at deployment locations including ingress/egress paths are acceptable. See L-004151.

		Cautions will be added to procedures to provide guidance for high dose rate areas to minimize dose.
2	Licensee to evaluate the ingress and egress paths for the expected severe accident conditions (temperature, humidity, radiation) for the sustained operating period. (ISE Section 3.3.2.3)	Started. The location of SAWA equipment and controls including ingress and egress paths will be the same or similar as FLEX and will be bounded by the FLEX evaluations for temperature and humidity. See the response to Phase 2 ISE Open Item #1 for radiation.
3	Licensee to demonstrate that containment failure as a result of overpressure can be prevented without a DW vent during severe accident conditions. (ISE Section 3.3.3)	Started. The wetwell vent has been designed to meet NEI 13-02 Rev 1 guidance, which will ensure that it is adequately sized to prevent containment overpressure under severe accident conditions. The SAWM strategy will ensure that the wetwell vent remains functional for the period of sustained operation. LaSalle will follow the guidance (flow rate and timing) for SAWA/SAWM described in BWROG-TP-15-008 and BWROG-TP-15-011. These documents have been posted to the ePortal for NRC staff review. The wetwell vent will be opened prior to exceeding the PCPL value of 60 PSIG. Therefore, containment over-pressurization is prevented without the need for a drywell vent.

<table>
<tr><td>4</td><td>Licensee shall demonstrate how the plant is bounded by the reference plant analysis that shows the SAWM strategy is successful in making it unlikely that a DW vent is needed. (ISE Section 3.3.3.1)</td><td>Started.

<table><tr><th>Reference Plant[1]</th><th>LaSalle</th></tr><tr><td>Torus freeboard volume is 525,000[1] gallons</td><td>Suppression pool freeboard volume is 977,404 gallons</td></tr><tr><td>SAWA flow is 500 GPM at 8 hr followed by 100 GPM from 12 hr to 168 hr</td><td>SAWA flow is 500 GPM at 8 hr followed by 100 GPM from 12 hr to 168 hr</td></tr><tr><td colspan="2">The above parameters for LaSalle compared to the reference plant that determines success of the SAWM strategy demonstrate that the reference plant values are bounding. Therefore, the SAWM strategy implemented at LaSalle makes it unlikely that a DW vent is needed to prevent containment overpressure related failure.

[1]Peach Bottom available freeboard volume in gallons is estimated from nominal water level of 14.7 feet to 21 feet. 21 feet is the upper range of the wide range torus level instrument and the assumed loss of wetwell vent function. The Peach Bottom torus is 31 feet in diameter.</td></tr></table></td></tr>
<tr><td>5</td><td>Licensee to demonstrate that there is adequate communication between the MCR and the operator at the FLEX pump during severe accident conditions. (ISE Section 3.3.3.4)</td><td>Started.

LaSalle utilizes handheld radios in the talk-around mode to communicate between the MCR and the operator at the FLEX pump. This communication method is the same as accepted in Order EA-12-049. These items will be powered and remain powered using the same methods as evaluated under EA-12-049 for the period of sustained operation, which may be longer than identified for EA-12-049.</td></tr>
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<td>6</td>
<td>Licensee to demonstrate the SAWM flow instrumentation qualification for the expected environmental conditions. (ISE Section 3.3.3.4)</td>
<td>Started.

For locations outside the Reactor Building between 7 hours and 7 days when SAWA is being utilized, a quantitative evaluation of expected dose rates has been performed per HCVS-WP-02 and found the dose rates at deployment locations including ingress/egress paths are acceptable (Ref. calculation L-004151, available on ePortal). The selected instrument is designed for the expected flow rate, temperature and pressure for SAWA over the period of sustained operation.
<table>
<tr><th>SAWA Flow Instrument Qualification</th><th>Expected SAWA Parameter Range</th></tr>
<tr><td>80 - 2300 gpm</td><td>100 - 500 gpm</td></tr>
<tr><td>Up to 125 °F</td><td>-25 to 101 °F</td></tr>
<tr><td>0 to 300 psi</td><td>0 to 250 psi</td></tr>
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7 Interim Staff Evaluation Impacts

There are no potential impacts to the Interim Staff Evaluation(s) identified at this time.

8 References

The following references support the updates to the combined Phases 1 and 2 Overall Integrated Plan described in this enclosure.

1. LaSalle's "Phase 1 Overall Integrated Plan in Response to June 6, 2013 Commission Order Modifying Licenses with Regard to Reliable Hardened Containment Vents Capable of Operation Under Severe Accident Conditions (Order Number EA-13-109)," dated June 30, 2014 (Accession No. ML14184A016).
2. NRC Order Number EA-13-109, "Order Modifying Licenses with Regard to Reliable Hardened Containment Vents Capable of Operation under Severe Accident Conditions" dated June 6, 2013 (Accession No. ML13143A321).
3. NEI 13-02, "Industry Guidance for Compliance with NRC Order EA-13-109, 'To Modify Licenses with Regard to Reliable Hardened Containment Vents Capable of Operation under Severe Accident Conditions," Revision 1, dated April 2015.

4. NRC Interim Staff Guidance JLD-ISG-2013-02, "Compliance with Order EA-13-109, Order Modifying Licenses with Regard to Reliable Hardened Containment Vents Capable of Operation Under Severe Accident Conditions," Revision 0, dated November 2013 (Accession No. ML13304B836).
5. NRC Endorsement of industry "Hardened Containment Venting System (HCVS) Phase 1 Overall Integrated Plan Template (EA-13-109) Rev 0" (Accession No. ML14128A219).
6. Industry White Paper HCVS-WP-04, "Missile Evaluation for HCVS Components 30 Feet Above Grade," Revision 0, dated August 17, 2015.
7. LaSalle's "Phase 1 (Updated) and Phase 2 Overall Integrated Plan in Response to June 6, 2013 Commission Order Modifying Licenses with Regard to Reliable Hardened Containment Vents Capable of Operation Under Severe Accident Conditions (Order Number EA-13-109)," dated December 16, 2015 (Accession No. ML15352A109).
8. NRC Interim Staff Guidance JLD-ISG-2015-01, "Compliance with Phase 2 of Order EA-13-109, Order Modifying Licenses with Regard to Reliable Hardened Containment Vents Capable of Operation Under Severe Accident Conditions," Revision 0, dated April 2015 (Accession No. ML15104A118).
9. Engineering Change EC 392353, "U2 Hardened Containment Vent System (HCVS)." Revision 5 approved February 24, 2017.
10. NRC "Interim Staff Evaluation Relating to Overall Integrated Plan in Response to Phase 1 of Order EA-13-109," dated March 31, 2015.
11. NRC "Interim Staff Evaluation Relating to Overall Integrated Plan in Response to Phase 2 of Order EA-13-109," dated August 2, 2016.