

September 28, 2001

Mr. Oliver D. Kingsley, President
Exelon Nuclear
Exelon Generation Company, LLC
1400 Opus Place, Suite 500
Downers Grove, IL 60515

SUBJECT: LASALLE COUNTY STATION, UNITS 1 AND 2 - REQUEST FOR ADDITIONAL
INFORMATION (TAC NOS. MB1982 AND MB1983)

Dear Mr. Kingsley:

By letter dated May 18, 2001, you submitted Relief Request CR-35, proposing an alternative to the existing American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code, Section XI, "Rules for Inservice Inspection of Nuclear Power Plant Components," requirements for the selection and examination of Class 1 and 2 piping welds. The Nuclear Regulatory Commission (NRC) staff has performed an initial review of your request and finds that it needs additional information to complete its review.

Therefore, it is requested that you respond to the enclosed request for additional information by October 26, 2001, for the staff to expedite its review. The questions were discussed and the response date agreed upon by members of your staff via telephone conference on September 25, 2001. With the exception of minor corrections to Item 9, the questions are unchanged from those sent by facsimile to your staff on September 13, 2001.

Sincerely,

/RA/

William A. Macon, Jr., Project Manager, Section 2
Project Directorate III
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket Nos. 50-373 and 50-374

Enclosure: Request for Additional
Information

cc w/encl: See next page

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LaSalle County Station
Units 1 and 2

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LaSalle County Station
Units 1 and 2

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LASALLE COUNTY STATION, UNITS 1 AND 2

REQUEST FOR ADDITIONAL INFORMATION

REGARDING AN ALTERNATIVE TO

ASME BOILER AND PRESSURE VESSEL CODE, SECTION XI

1. The Individual Plant Examination (IPE) staff evaluation report dated March 14, 1996, noted that review of the LaSalle County Station (LaSalle), Units 1 and 2, IPE was different from the review of most IPEs, as the LaSalle IPE was developed from previous staff studies. However, based on the IPE submittals from Zion, Quad Cities, and Dresden, the staff evaluation report had technical concerns regarding your methodology for common cause and human reliability analysis. The technical concern regarding common cause from the other IPEs was that the common cause failures parameters were lower than normally used. There were several human error concerns including the treatment of pre- and post-initiator human actions and the treatment of time and other performance shaping factors. Please describe how these concerns have been addressed in the current LaSalle Probabilistic Risk Assessment (PRA).
2. Please provide a version number or other reference identifying the version of the PRA used to support the submittal.
3. Please provide the baseline core damage frequency (CDF) and large early release frequency (LERF) of the version of the PRA used to support the submittal.
4. Page 18 of 32 states that, “[t]he RI-ISI risk impact calculations took credit for the IGSCC and FAC program inspections in that no change in risk was considered for those welds when a Section XI examination was removed.” The staff has found this acceptable as long as the elements are inspected under the intergranular stress corrosion cracking (IGSCC) or flow-accelerated corrosion (FAC) program. In other words, if an IGSCC Category B weld is not being inspected in the IGSCC program, and a Section XI inspection on the weld is being discontinued in risk informed - inservice inspection (RI-ISI) program, the impact of discontinuing that inspection should be reflected in the change in risk calculations. The failure frequency used may exclude the IGSCC or FAC degradation mechanism. Please confirm that the change in risk calculation reflects the impact of all discontinued inspections (in medium and high segments), or provide results demonstrating that the change in risk, including these discontinued inspections, continue to meet all the Electric Power Research Institute (EPRI) change in CDF and LERF criteria.
5. Code requirements listed on page 2 of 5 of the submittal need clarification. Examination Category B-F should include Items B5.130, B5.140, and B5.150. The submittal lists Items B5.10, B5.130, and B5.150. Thus Item B5.10 is included instead of B5.140. Similar clarifications are needed for Items in Category B-J, C-F-1 and C-F-2.

6. Please clarify that the RI-ISI program be updated every 10 years and submitted to the NRC consistent with the current ASME XI requirements.
7. Please describe the conditions under which the RI-ISI program will be resubmitted to the NRC before the end of any 10-year interval.
8. Page 10 of your submittal discusses the criteria for engineering evaluation and additional examinations if unacceptable flaws or relevant conditions are found during examinations. Please clarify that the evaluation will include other elements in the segment or segments subject to the same root cause conditions. Please clarify how the elements will be selected for additional examinations. Specifically, please verify that the elements will be selected based on the root cause or damage mechanism, and include high risk significant as well as medium risk significant elements (if needed) to reach the required number of additional elements, not limited to elements with the same or higher failure potential.
9. Page 19 of your submittal states that Unit 2 is in the second period of the second interval. The submittal further states that 43 percent of the ASME XI examinations have been completed. Please clarify whether the remaining 57 percent of the examinations will be from the ASME XI or the RI-ISI program. Please specify, also, which 57 percent of the RI-ISI examinations will be performed as well as the basis for that selection. A similar question also applies to Unit 1.