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Exelon Nuclear

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United States Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D.C. 20555

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

Subject: Response to Request for Additional Information for Extension of Allowable Completion Times of the Division 1 and 2 Emergency Diesel Generators

References: (1) Letter from C. G. Pardee (EGC) to the U.S. NRC, "Request for Amendment to Technical Specifications, Extension of Allowable Completion Times for Division 1 and 2 Emergency Diesel Generators," dated February 20, 2001.

(2) Letter from J. B. Hopkins (U.S. NRC) to O. D. Kingsley (EGC), LaSalle County Station, Units 1 and 2 – Request for Additional Information (TAC Nos. MB1224 and MB1225)," dated June 5, 2001.

(3) Letter from C. G. Pardee (EGC) to the U.S. NRC, "Response to Request for Additional Information, Extension of Allowable Completion Times for Division 1 and 2 Emergency Diesel Generators," dated July 13, 2001.

Exelon Generation Company (EGC), LLC, in Reference No. 1, proposed changes to the Technical Specifications (TS) of LaSalle County Station, Units 1 and 2, that would extend the allowable completion times for the required actions associated with restoration of an inoperable Division 1 or Division 2 Emergency Diesel Generator (EDG). During recent discussions, the NRC has requested additional information to complete their review. Attached is the requested information.

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Should you have any questions concerning this letter, please contact Mr. William Riffer, Regulatory Assurance Manager, at (815) 415-2800.

Respectfully,

Charles G. Pardee
Site Vice President
LaSalle County Station

Attachment

cc: Regional Administrator - NRC Region III
NRC Senior Resident Inspector - LaSalle County Station
Office of Nuclear Facility Safety – Illinois Department of Nuclear Safety

ATTACHMENT

Response to Request for Additional Information for Extension of Allowable Completion Times of the Division 1 and 2 Emergency Diesel Generators

Exelon Generation Company (EGC), LLC, in a letter dated February 20, 2001, proposed changes to the Technical Specifications (TS) of LaSalle County Station, Units 1 and 2, that would extend the allowable completion times for the required actions associated with restoration of an inoperable Division 1 or Division 2 Emergency Diesel Generator (EDG). The NRC has requested additional information to complete their review. The NRC specifically requested additional information relating to the risk associated with extending this allowable completion time from 10 to 17 days. The requested information is contained in the below paragraphs.

EGC Response:

The proposed extension of the completion time to 14 days for a Division 1 or Division 2 EDG results in a corresponding extension of the proposed TS time period associated with discovery of failure to meet TS Limiting Condition for Operation (LCO) 3.8.1," AC Sources – Operating," from 10 days to 17 days. The 17-day completion time limits the amount of continuous time that a plant can fail to meet LCO 3.8.1 as a result of entry into Conditions A, B or C.

1. Risk Evaluation of Multiple EDG Causes

The risk evaluation contained in our letter dated February 20, 2001, performed to justify the EDG completion times of 14 days, was based on the assumption that each Division 1 or Division 2 EDG would be made unavailable for 14 days each operating cycle, for a total of 42 days in each operating cycle for the site. This is equivalent to 28 days per unit since the Division 1 EDG is shared between two units. Therefore, the risk associated with the failure to continuously meet LCO 3.8.1 for 17 days as a result of multiple entries into Action Conditions A, B or C for EDG causes, is bounded by the risk evaluation contained in our letter dated February 20, 2001.

2. Risk Evaluation of EDG and Offsite Power Source Causes

The offsite circuit completion time of 72 hours takes into account the capacity and capability of the remaining alternating current (AC) sources, reasonable time for repairs, and the low probability of a design basis accident during this period. A risk evaluation has been performed to estimate the risk impact of having an offsite power source unavailable for 72 hours. The Incremental Conditional Core Damage Probability (ICCDP) and Incremental Conditional Large Early Release Probability (ICLERP) was determined by examining the effects of increasing the applicable loss of offsite power (LOOP) and dual unit LOOP (DLOOP) initiating event frequencies that a single offsite power source unavailable would represent. In addition, the conditional probability of a transient initiating event causing a LOOP/DLOOP were confirmed to have negligible impact on the subject risk metrics when an offsite power source was unavailable.

The risk evaluation showed that having a single offsite power source unavailable for up to 72 hours is not risk significant. The ICCDP and ICLERP for this situation were each several orders of magnitude less than NRC acceptance guidelines delineated in Regulatory Guide 1.177. The calculated risk metric results are summarized below.

PRA Event	Calculated ICCDP	NRC Acceptance Guideline	Calculated ICLERP	NRC Acceptance Guideline
Offsite Source $_{LOOP}$	6.3E-12	--	6.3E-12	--
Offsite Source $_{DLOOP}$	5.6E-11	--	5.6E-11	--
TOTAL	**6.2E-11**	**5.0E-07**	**6.2E-11**	**5.0E-08**

Conservatively, the ICCDP and ICLERP for the offsite power source can be added to the ICCDP and ICLERP values developed for the individual EDGs. For example, the EDG with the highest ICCDP was the Division 1 EDG. It has an ICCDP of 3.7E-07 based on 14 days of unavailability. Adding the ICCDP for an offsite source unavailability to the Division 1 EDG unavailability, the total remains 3.7E-07, which is less than the NRC guideline of 5.0E-07 and consistent with the risk evaluation contained in our letter dated February 20, 2001.

Therefore, the risk associated with the failure to continuously meet LCO 3.8.1 for 17 days as a result of multiple entries into Action Conditions A, B or C for EDG and offsite power causes, is bounded by the risk evaluation contained in our letter dated February 20, 2001.

3. Conclusion

The proposed extension of the completion time to 14 days for a Division 1 or Division 2 EDG results in a corresponding extension of the proposed TS time period associated with discovery of failure to meet TS LCO 3.8.1 from 10 days to 17 days. As described above, the risk associated with the proposed change to 17 days is bounded by the risk evaluation contained in our letter dated February 20, 2001.