August 15, 2002

Mr. John L. Skolds, President Exelon Nuclear Exelon Generation Company, LLC 4300 Winfield Road Warrenville, IL 60555

SUBJECT: LASALLE COUNTY STATION, UNITS 1 AND 2 - REQUEST FOR ADDITIONAL

INFORMATION (TAC NOS. MB5529 AND MB5530)

Dear Mr. Skolds:

By letter dated June 14, 2002, you submitted Relief Request RV-14 to implement the 1995 Edition and 1996 Addenda of the American Society of Mechanical Engineers Code for Operation and Maintenance of Nuclear Power Plants, OMa-1996, Subsection Inservice Testing Code, as it applies to motor operated valves, including the Code Case OMN-1, "Alternative Rules for Preservice and Inservice Testing of Certain Electric Motor-Operated Valve Assemblies in Light-Water Reactor Power Plants." 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, please respond to the enclosed request for additional information by September 20, 2002, for the staff to expedite its review. The response date was agreed upon by members of your staff on August 2, 2002. The enclosed questions are unchanged from those sent by e-mail to a member of your staff on July 30, 2002.

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: As stated

cc w/encl: See next page

Mr. John L. Skolds, President **Exelon Nuclear** Exelon Generation Company, LLC 4300 Winfield Road Warrenville, IL 60555

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Project Directorate III

Division of Licensing Project Management Office of Nuclear Reactor Regulation

Docket Nos. 50-373 and 50-374 Distribution:

> **PUBLIC** OGC

Enclosure: As stated PD3/2 r/f ACRS **AMendiola** DHills, RIII

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cc w/encl: See next page WMacon

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OFFICIAL RECORD COPY

LaSalle County Station Units 1 and 2

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REQUEST FOR ADDITIONAL INFORMATION LASALLE COUNTY STATION, UNITS 1 AND 2

- 1. Under "Proposed Alternative Provisions" in Relief Request RV-14, the licensee proposes to use the motor-operated valve (MOV) testing provisions in ASME OMa-1996, Subsection ISTC, at LaSalle County Station, Units 1 and 2, in lieu of its present inservice testing (IST) requirements in its Code of record, OMa-1988, Part 10. Discuss planned changes to inservice testing intended at LaSalle through this relief request, other than the application of the provisions of ASME Code Case OMN-1, "Alternative Rules for Preservice and Inservice Testing of Certain Electric Motor-Operated Valve Assemblies in Light Water Reactor Power Plants."
- 2. In paragraph B under "Proposed Alternative Provisions" in Relief Request RV-14, the licensee requests relief from Sections 3.3(b), 3.4, and 6.3 of ASME Code Case OMN-1. In paragraph B, the licensee describes its commitment to conduct sample as-found testing to validate its assumptions for MOV degradation (rather than performing as-found testing in all situations). Discuss the planned activities as alternatives to Sections 3.4 and 6.3 of the code case.
- 3. In paragraph C.3 under "Proposed Alternative Provisions" in Relief Request RV-14, the licensee states that LaSalle does not consider stem lubrication to invalidate the as-found condition of an MOV. In Section 3.3(b), ASME Code Case OMN-1 notes that MOV stem lubrication might invalidate the as-found condition for inservice testing. In paragraph B under "Proposed Alternative Provisions," the licensee commits to perform sample MOV as-found testing to validate its degradation assumptions. Discuss plans to continue the commitment to conduct sample MOV as-found testing to support the ongoing assumption that stem lubrication does not adversely impact the as-found condition of the MOV.
- 4. In paragraph E under "Proposed Alternative Provisions" in Relief Request RV-14, the licensee states that it will continue to perform exercise tests and position indication tests in accordance with ISTC requirements for those MOVs identified as having IST requirements, but are not subject to diagnostic testing. The diagnostic test provisions of ASME Code Case OMN-1 are applicable to all MOVs within the scope of the code case. Supplement 1 to Generic Letter 89-10, "Safety-Related Motor-Operated Valve Testing and Surveillance," indicated that successful industry experience with some valve types (such ball and plug valves) could be used to justify the omission of MOV dynamic tests in validating their design-basis calculations. Discuss plans to satisfy the provisions for diagnostic testing of MOVs within the scope of ASME Code Case OMN-1.