

May 21, 2003

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. MB6574 AND MB6575)

Dear Mr. Skolds:

By letter dated October 24, 2002, you submitted a request for amendment to Technical Specifications (TS) related to TS 5.5.13, "Primary Containment Leakage Rate Testing Program." The U.S. 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 June 20, 2003, for the NRC staff to expedite its review. The response date was agreed upon by members of your staff on May 16, 2003. The enclosed questions are unchanged from those sent by e-mail to a member of your staff on May 8, 2003.

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

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## **REQUEST FOR ADDITIONAL INFORMATION**

### **LASALLE COUNTY STATION, UNITS 1 AND 2**

Reference: Letter from K. R. Jury (Exelon Nuclear) to NRC, "Request for Amendment to Technical Specification 5.5.13, Primary Containment Leakage Rate Testing Program," October 24, 2002.

1. Section 5.5 of Attachment 2 of the reference provides a summary of the containment inservice inspection. The summary indicates that the first period inspections were performed in accordance with the 1992 Edition and the 1992 Addenda (1992 E & A) of Subsections IWE and IWL of Section XI of the American Society of Mechanical Engineers (ASME) Code and were completed in 2000. The summary also notes that the future inspections will be performed using the 1998 Edition of the ASME Code as approved by NRC relief requests. The staff requests the licensee to clarify (1) if the 1992 E & A will continue to be used until the end of the current inspection interval or whether a new interval will be established for the use of 1998 Edition of the ASME Code, and (2) if the licensee is planning to use the 1998 Edition of the ASME Code, its extent of compliance with the amended rule to 10 CFR 50.55a (67 FR 60520) which incorporates by reference the 1998 Edition through the 2000 Addenda of the Code including any modifications and limitations in 10 CFR 50.55a(b)(2).
2. The staff requests the licensee to provide a summary of significant findings (pits in excess of 10 percent of the nominal liner thickness) in the submerged areas of the wet-well.
3. The staff requests the licensee to provide a summary of findings of the examination of containment concrete performed in accordance with 10 CFR 50.55a and Subsection IWL including the acceptance criteria used for concrete and reinforcing bar degradation.
4. Recognizing the hardship associated with examining seals, gaskets, and pressure retaining bolts during each inspection period, and that the examination will be performed prior to Type B testing as required by Option A of Appendix J, the staff had approved such relief to a number of licensees. However, implementation of Option B of Appendix J allows flexibility in performing Type B testing based on the leak rate performance of the penetrations. Because the performance-based testing allows certain leak rate through the penetrations, minor initial degradation of the associated seals, gaskets and bolting can go undetected, and the 10-year examination interval could be too long for the degraded components. Thus, examination of seals, gaskets, and pressure retaining bolting should be scheduled based on their performance (i.e., plant-specific experience, replacement schedules for resilient seals, etc.) to ensure that, if Type B testing is not performed during the ILRT extension period, the examination schedule will detect degradation of these components. In view of this discussion staff requests the licensee to provide a schedule for examination (testing) of these components; especially for equipment hatches and other penetrations with resilient seals.

ENCLOSURE

5. Based on the write-up in Section 5.6 of Attachment 2 of the submittal, the staff assumes that there are no containment pressure boundary bellows at LaSalle Units 1 and 2. The staff requests the licensee to confirm this assumption.
6. The October 24, 2002, submittal provides risk impacts for a change in test frequency from 1 test in 10 years to 1 test in 15 years. The staff requests the licensee to provide the corresponding risk results (for  $\Delta$ person-rem,  $\Delta$ LERF, and  $\Delta$ CCFP) for a change in test frequency from 3 tests in 10 years to 1 test in 15 years.
7. The staff requests the licensee to provide the technical justification for the assumption in the risk analysis that no long-term station blackout scenarios contribute to LERF. If this justification is based on timing arguments, provide a timeline for a representative scenario that includes consideration of the time at which the various emergency action levels are declared, the decision to evacuate is made, and the evacuation is initiated and completed. If this justification is based on source term magnitude, provide the estimated source terms for a representative scenario, and the definition of LERF used for this determination.
8. The staff requests the licensee to provide an assessment of the impact on risk results ( $\Delta$ person-rem,  $\Delta$ LERF, and  $\Delta$ CCFP) if long-term station blackouts were not removed from the residual core damage frequency when determining the Category 3a and 3b frequencies.
9. Inspections of some reinforced and steel containments (e.g., North Anna, Brunswick, D. C. Cook, and Oyster Creek) have indicated degradation from the uninspectable (embedded) side of the steel shell and liner of primary containments. The staff requests the licensee to describe the uninspectable areas of the LaSalle containments, and the programs used to monitor their condition. Provide a quantitative assessment of the impact on LERF due to age-related degradation in these areas, in support of the requested ILRT interval extension from 10 to 15 years.