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U. S. Nuclear Regulatory Commission
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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 Task Interface Agreement 2001-14, "Evaluation of LaSalle Water Hammer Analysis, Revision 1"

References:

(1) Memorandum from G. E. Grant (NRC) to L. B. Marsh (NRC), "Task Interface Agreement (TIA 2001-14) Evaluation of LaSalle Waterhammer Analysis," dated November 2, 2001

(2) Memorandum from L. E. Marsh (NRC) to G. E. Grant (NRC), "Task Interface Agreement (2001-14) Evaluation of LaSalle Waterhammer Analysis (TAC NOS. MB3366 and MB3367)," dated July 1, 2002

(3) Letter from K. Jury (EGC) to NRC, "Response to Task Interface Agreement 2001-14, " Evaluation of LaSalle Waterhammer Analysis," dated January 13, 2003

(4) Memorandum from L. E. Marsh (NRC) to G. E. Grant (NRC), "Task Interface Agreement (2001-14) Evaluation of LaSalle Waterhammer Analysis, Revision 1 (TAC NOS. MB7220 and MB7221)," dated April 28, 2003

(5) Letter from W. A. Macon (NRC) to J. L. Skolds (EGC), "Response to Task Interface Agreement 2001-14, " Evaluation of LaSalle Waterhammer Analysis," dated April 29, 2003

The purpose of this letter is to provide Exelon Generation Company, LLC, (EGC) perspectives regarding a recently received Task Interface Agreement (TIA) 2001-14, "Evaluation of LaSalle Water Hammer Analysis, Revision 1," (Reference 4) and the NRC letter "Response to Task Interface Agreement 2001-14, ' Evaluation of LaSalle Waterhammer Analysis'" (Reference 5). References 4 and 5 involve the impact of operating the LaSalle County Station (LSCS) Residual Heat Removal (RHR) system in Suppression Pool Cooling (SPC) mode.

EGC has completed a comprehensive review of References 4 and 5 and concludes the following.

- The LaSalle County Station (LSCS) Updated Final Safety Analysis Report (UFSAR) does require revision to better define the design basis limitation associated with RHR in SPC mode. This revision will be conducted in two phases. First, as an interim measure, the allowable operational period for RHR in SPC mode will be limited in time to a "2 percent per operating cycle" criterion. This criterion is based on the exception to General Design Criterion 4 (GDC-4), "Environmental and dynamic effects design bases", in Standard Review Plan (SRP) Section 3.6.2. As stated in Reference 4, the SRP Section 3.6.2 criterion is not directly applicable to RHR in SPC mode, however, EGC believes that the use of the "2 percent per operating cycle" criterion is acceptable as an interim measure. LSCS is currently scheduled to complete the interim UFSAR update by July 2003. Second, EGC is working with the Boiling Water Reactor Owners Group (BWROG) to develop an industry acceptable evaluation methodology that will be directly applicable to RHR in SPC mode. The current intention of the BWROG is to request NRC concurrence of the proposed methodology. LSCS intends to utilize the outcome of this process to replace the interim criterion for RHR in SPC mode in the LSCS UFSAR.

- Once the UFSAR is updated, if the operation of RHR in SPC mode exceeds the specific UFSAR allowable operational period, the continued RHR operation would constitute a nonconforming condition subject to the guidance contained in Part 9900, "Technical Guidance," of the NRC Inspection Manual for all modes of RHR.

Should you have any questions concerning this matter, please contact Mr. T. W. Simpkin at (630) 657-2821.

Respectfully,

T. W. Simpkin
Manager – Licensing
Mid-West Regional Operating Group

cc: Regional Administrator – NRC Region III
NRC Senior Resident Inspector – LaSalle County Station
Office of Nuclear Facility Safety – Illinois Department of Nuclear Safety
Deputy Director, Division of Systems Analysis and Regulatory Effectiveness – Office of Nuclear Regulatory Research