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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: Environmental Protection Plan Operating Report Appendix B to Facility License Nos. NPF-11 and NPF-18

Attached is the 2003 Exelon Generation Company (EGC), LLC, LaSalle County Station, Annual Environmental Operating Report for the Environmental Protection Plan as required by Section 5.4 of Appendix B to Facility License Nos. NPF-11 and NPF-18.

This report includes information required by the following subsections of Appendix B.

3.1 Plant Design and Operation

4.2.1 Vegetative Integrity on Cooling Pond Dike

5.4.1 EPP Noncompliances and the Corrective Actions to Remedy Them

5.4.2 Non-routine Reports

Eighteen copies of this report are being submitted in accordance with Regulatory Guide 10.1, "Compilation of Reporting Requirements For Person's Subject To NRC Regulations."

IE25

Should you have any questions concerning this letter, please contact Mr. Glen T. Kaegi at (815) 415-2800.

Respectfully,

Terrence W. Simpkin
Regulatory Assurance Manager - Acting
LaSalle County Station

Attachment

cc: Regional Administrator - NRC Region III
NRC Senior Resident Inspector - LaSalle County Station

LaSalle County Station
Environmental Protection Plan

2003 Annual Environmental Operating Report

Introduction

Presented below is a summary of environmentally related activities at LaSalle County Station for the year 2003. The summary reveals no significant environmental impacts as a result of station operation.

Plant Design and Operation

No changes were made in station design or operation, nor any tests or experiments performed, which have been classified as an unreviewed environmental question per the Environmental Protection Plan, Subsection 3.1.

Vegetative Integrity on Cooling Pond Dike

The vegetative integrity on the cooling pond dike was inspected in accordance with LaSalle County Station Surveillances LTS-1000-5, "Minor Dike Inspection," and LTS-1000-32, "Major Dike Inspections."

Cooling Pond dike inspections were completed on May 8 and August 7, 2003. The results of these inspections revealed that the vegetative growth on the dikes was satisfactory and no reseeding was required. No animal burrows were found.

At Cooling Pond Dike Station 150, some minor slope instability was observed along an approximately 30-foot section of the east perimeter ditch area, where the ditch and the dike toe meet. This sloughing was noted during the 2001 inspection and has not deteriorated since then. The discrepancy is not considered a threat to dike integrity and will receive continued monitored during future dike inspections. A Work Order has been written to re-grade the ditch.

Minor growths of trees, shrubs and weeds were found on the various exterior dike toe areas, the interior dikes, and at the auxiliary spillway during the inspections. However, extensive reed and tall weed growth was found at the toe of the exterior dikes and in the perimeter ditch. Minor erosions in the Blowdown Canal, depressions, roadway potholes, auxiliary spillway cracks, debris accumulations, and miscellaneous repair items

were also identified. None of these items impacted the integrity of any of the peripheral dikes. Work Orders have been written to remove the extraneous growth and to correct various other minor Cooling Pond dike discrepancies.

On December 5, 2003, LaSalle County Station conducted a Communication Drill to assess station and offsite agency response actions for performing required telephone calls in accordance with the notification flowchart in the "Emergency Action Plan for LaSalle County Station – Cooling Lake Dike" (EAP). The drill did not meet its defined success criteria for performing all the required offsite agencies notifications. The drill was critiqued, and lessons learned were distributed to the participating agencies. The drill will be re-performed by June 30, 2004.

EPP Noncompliances and Corrective Actions Taken to Remedy Them

No Environmental Protection Plan or NPDES noncompliances occurred during 2003.

Non Routine Reports

On November 2, 1999, during removal of outdoor underground storage tanks for the old filling station, a waste oil tank was found to have leaked. Notifications were made to the National Response Center (Incident No. 504538), Illinois Emergency Management Agency (IEMA) (Incident No. 992477), and the Nuclear Regulatory Commission. Immediate actions were taken to ensure the safety of personnel and the environment. Sampling of the released liquid was performed, and free product was removed from the hole to the maximum extent practicable. No radiological materials were involved.

Subsequent analysis identified the presence of chlorinated solvents and heavy metals. In accordance with State environmental Leaking Underground Storage Tank regulations, a 20-Day Certification, 45-Day Report, and Free Product Removal Report were submitted to the IEPA. A Site Classification Work Plan was submitted to the Illinois Environmental Protection Agency (IEPA) on March 27, 2000, which was conditionally approved on June 27, 2000, outlining station actions for characterizing the underground release. A Site Classification Budget was submitted on September 14, 2000.

Site classification activities began with the installation of monitoring wells around the release area and core sampling of the ground on October 25-27, 2000. Well development and groundwater sampling were completed on January 11, 2001. A Site Classification Completion Report was submitted on December 5, 2001, documenting the results of the groundwater monitoring and core sampling activities. The site was classified as "NO FURTHER ACTION", since the release did not threaten human health or the environment. Also, on December 10, 2001, a revised Site Classification Budget was submitted to IEPA to address concerns from their previous conditional approval.

In a letter dated April 11, 2002, IEPA notified LaSalle County Station that the submitted Site Classification Completion Report was rejected. According to IEPA, most initial requests for closure are reviewed very critically, rejected, and then attached with comments for inclusion in a follow-up submittal. Station personnel and the project environmental contractor met with the IEPA on May 22, 2002, and developed an action plan to resolve their concerns. On July 9, 2002, the project environmental contractor submitted a response to the IEPA documenting the mutually agreed upon additional investigation actions. On August 23, 2002, work was completed to perform 12 additional soil borings for further investigative sampling, and to install an additional groundwater monitoring well in accordance with IEPA recommendations. On May 3, 2003, an amended Site Classification Completion Report was submitted to IEPA documenting the results of the additional investigative actions and sampling. The amended report showed that any additional potential migration pathways could be ruled out as threats to human health or the environment. Consequently, the project engineer continued to classify the site as "NO FURTHER ACTION".

In a letter dated September 5, 2003, IEPA notified LaSalle County Station that the submitted amended Site Classification Completion Report was not approved. The IEPA had comments centering on sampling and analytical technical requirements. On December 30, 2003, an explanatory response letter was submitted to the IEPA answering their questions and providing additional technical documentation from the laboratory. An additional environmental contractor was brought in to peer check the response from the current contractor. The response letter is currently under review by the IEPA. A reply from the IEPA is expected in May 2004.