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June 16, 2004

U. S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, DC 20555-0001

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:** Additional Information Supporting the Request for Technical Specification Changes to Eliminate Selected Response Time Testing Requirements

**Reference:** Letter from K. A. Ainger (Exelon Generation Company, LLC) to U. S. NRC, "Request for Technical Specification Changes to Eliminate Selected Response Time Testing Requirements," dated March 12, 2004

In the referenced letter, Exelon Generation Company, LLC (EGC) submitted a request for a change to Appendix A, Technical Specifications (TS), of Facility Operating License Nos. NPF-11 and NPF-18 for LaSalle County Station. Specifically, the proposed changes would modify the TS to eliminate selected response time testing (RTT) requirements associated with Reactor Protection System instrumentation and Primary Containment Isolation instrumentation for Main Steam Line Isolation functions. The proposed changes are consistent with the approved BWR Owners' Group Licensing Topical Report.

The NRC subsequently provided electronically a request for additional information in support of their review of the referenced amendment request. Attachment 1 to this letter provides the requested information.

*Designated  
original per PM  
replacement  
for doc w/out  
proper  
affirmation*

June 16, 2004  
U. S. Nuclear Regulatory Commission  
Page 2

Should you have any questions related to this information, please contact Mr. Timothy A. Byam at (630) 657-2804.

I declare under penalty of perjury that the foregoing is true and correct.

Respectfully,

June 16, 2004  
Executed on

K. A. Ainger  
K. A. Ainger  
Manager – Licensing  
Exelon Generation Company, LLC

Attachment: Additional Information Supporting the Request for Technical Specification Changes to Eliminate Selected Response Time Testing Requirements

## ATTACHMENT

### Additional Information Supporting the Request for Technical Specification Changes to Eliminate Selected Response Time Testing Requirements

The NRC request for additional information on the proposed Technical Specification changes to eliminate selected response time testing requirements for the LaSalle County Station stated the following.

*The licensee has asked for two sensors, the SOR 9N6B45-NX-C1A-JJTTX6 pressure switch and the Rosemount 1153DB series differential pressure transmitter, to be included in the request for RTT elimination.*

*For the loop type K, the licensee stated that test data from the last sensor response time test were reviewed and found to range from 200 to 305 msec, and therefore the maximum allowable loop sensor response time was determined to be 465 msec.*

*For the loop type E, the licensee stated that test data from the last sensor response time test were reviewed and found to range from 100 to 200 msec, and therefore the maximum allowable loop sensor response time was determined to be 756 msec.*

*For the loop type J, the licensee stated that test data from the last sensor response time test were reviewed and found to range from 265 to 1643 msec, and therefore the maximum allowable loop sensor response time was determined to be 1880 msec.*

*Please provide the following information:*

#### Question 1

*For each loop type, please state which sensor type and range code is used.*

#### Response 1

The attached table identifies the sensor type and range code used for each loop type evaluated in the subject amendment request. As discussed in Section 4.2 of the original submittal (Reference 1 of this attachment), the loop type was determined based on the specific combination of components in the loop. This was completed using Table 6-2 from Reference 2 of this attachment. The requirement for response time testing of the sensors in the attached table was previously eliminated as part of the LaSalle County Station conversion to Improved Technical Specifications as described in Section 3.0 of Attachment 1 to Reference 1 of this attachment.

#### Question 2

*For each loop type, please explain how the bounding response time was determined from the recorded historical test data. Was a value chosen with a 95/95 tolerance limit, as described in NUREG-1475? Were the number of historical test data points taken into consideration?*

## ATTACHMENT

### Additional Information Supporting the Request for Technical Specification Changes to Eliminate Selected Response Time Testing Requirements

#### Response 2

As stated in Section 3.0 of Attachment 1 to Reference 1 of this attachment, LaSalle County Station revised the Technical Specifications to eliminate selected response time testing requirements as part of the conversion to Improved Technical Specifications. Specifically, the definitions for Emergency Core Cooling System (ECCS) response time, Isolation System response time, and Reactor Protection System (RPS) response time were modified, as well as the Bases for the associated Surveillance Requirements in accordance with the guidance provided in Standard Technical Specification Change traveler TSTF-332, Revision 0. The changes supported elimination of the need for response time testing of sensors for selected parameters in the RPS and primary containment isolation systems as previously approved in Reference 3 of this attachment. The NRC approved these changes in addition to the conversion to Improved technical Specifications in Reference 4 of this attachment.

Attachment 1 to Reference 1 of this attachment documents the determination of the bounding response time (BRT) for each component in the specified instrument loops. The BRT was not determined using recorded historical test data. Each BRT is the value that was developed in accordance with the guidance provided in Reference 2 of this attachment. Section 6 and Appendices B and C in Reference 2 of this attachment were used to identify the loop logic BRT for each specified loop type. Then, in accordance with the guidance provided in Appendix C to Reference 2 of this attachment, the maximum allowable loop sensor BRT was determined by taking the difference between the instrument loop maximum allowable response time and the loop logic BRT. The maximum allowable response time for each specified trip function is defined in Appendix E to the LaSalle County Station Technical Requirements Manual. This method for determining the BRT is detailed in Section 4.2 of Attachment 1 to Reference 1 of this attachment and was used in accordance with the application guidelines provided in Section 8 to Reference 2 of this attachment.

In summary, the BRT was determined in accordance with the guidance provided in the BWR Owners' Group Licensing Topical Report (i.e., Reference 2 of this attachment) and did not require consideration of historical test data. Therefore, there was no statistical evaluation of historical test data required to determine the BRT for the selected components and instrument loops.

#### Question 3

*Please provide the historic test data for each of the sensors in each loop type.*

#### Response 3

As discussed above in the response to Question 2, LaSalle County Station did not use historical test data in the determination of the BRT for each loop type. The response time test data from the last performance of response time testing for the selected sensors was used to confirm that the sensor BRT was not exceeded, thus verifying the

**ATTACHMENT**

Additional Information Supporting the Request for Technical Specification Changes to Eliminate Selected Response Time Testing Requirements

loop met the criteria in Reference 2 of this attachment. This testing was completed prior to the approved elimination of selected sensor response time testing requirements (i.e., Reference 3 of this attachment).

**TABLE 1**  
**Loop Type Sensors and Test Data**

<b>Loop Type</b>	<b>Sensor</b>	<b>Sensor Number</b>
<b>K</b>	<b>SOR 9N6-B45-NX-C1A-JJTTX6</b>	1B21-N023AA 1B21-N023BA 1B21-N023C 1B21-N023D 2B21-N023AA 2B21-N023BA 2B21-N023C 2B21-N023D
<b>E</b>	<b>Rosemount 1153DB Series</b>	1B21-N402A 1B21-N402B 1B21-N402C 1B21-N402D 2B21-N402A 2B21-N402B 2B21-N402C 2B21-N402D
<b>J</b>	<b>SOR 9N6-B45-NX-C1A-JJTTX6</b>	1B21-N015A 1B21-N015B 1B21-N015C 1B21-N015D 2B21-N015A 2B21-N015B 2B21-N015C 2B21-N015D

**References:**

1. Letter from Mr. K. A. Ainger (Exelon Generation Company, LLC) to U. S. NRC, "Request for Technical Specification Changes to Eliminate Selected Response Time Testing Requirements," dated March 12, 2004
2. BWR Owners' Group Licensing Topical Report, "System Analyses for the Elimination of Selected Response Time Testing Requirements," NEDO-32291-A, Supplement 1, dated October 1999

**ATTACHMENT**

**Additional Information Supporting the Request for Technical Specification Changes to  
Eliminate Selected Response Time Testing Requirements**

3. Letter from U. S. NRC to Ms. I. Johnson (Commonwealth Edison Company),  
"Issuance of Amendments (TAC NOS. M95252 and M95253)," dated August 14,  
1996
4. Letter from U. S. NRC to Mr. O. D. Kingsley (Exelon Generation Company, LLC),  
"Issuance of Amendments (TAC NOS. MA8388 and MA8390)," dated March 30,  
2001