

Exelon Generation Company, LLC
LaSalle County Station
2601 North 21st Road
Marseilles, IL 61341-9757

www.exeloncorp.com

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U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D.C. 20555

LaSalle County Station Unit 2
Facility Operating License No. NPF-18
NRC Docket No. 50-374

Subject: Report on Inoperable Drywell Hydrogen and Oxygen Concentration
Post Accident Monitoring Instruments

Pursuant to Technical Specification (TS) 5.6.6, "Post Accident Monitoring (PAM) Instrumentation Report," this letter satisfies the requirement to submit a report within 14 days outlining the preplanned alternate method of monitoring, the cause of the inoperability, and the plans and schedule for restoring the Division 2 Drywell Hydrogen and Oxygen PAM Instrumentation to operable status.

TS Limiting Condition for Operation (LCO) 3.3.3.1, "PAM Instrumentation," requires two channels of Drywell Hydrogen and Oxygen Concentration instrumentation to be operable in Modes 1 and 2. On March 21, 2005, during the performance of quarterly Primary Containment Isolation Valve (PCIV) stroke testing, the 2B H₂/O₂ Monitor Suppression Chamber Suction Valve (2CM023B), exhibited inconsistent indications during cycling and was declared inoperable. In accordance with TS LCO 3.6.1.3, "PCIVs," the penetration was isolated by closing the 2B H₂/O₂ Monitor sample panel (2PL77J) manual isolation valve. Since the Drywell H₂/O₂ Monitoring instrumentation is designed to automatically initiate and begin monitoring the drywell atmosphere upon receipt of an Engineered Safety Features actuation signal, the Division 2 Hydrogen and Oxygen Monitors were declared inoperable and Condition A of TS LCO 3.3.3.1 was entered for Table 3.3.3.1-1, Functions 7 and 8. Required Action 3.3.3.1.A.1 to restore the channels to operable status within the 30 day Completion Time could not be accomplished due to the plant conditions needed to repair valve 2CM023B. Per Condition 3.3.3.1.B, if the Required Action and associated Completion Time of Condition A are not met, action must be initiated in accordance with TS 5.6.6.

Troubleshooting performed on valve 2CM023B indicates potential problems with the valve internals. 2CM023B is the first valve in the line coming from the primary containment; therefore, any repair or replacement of the defective valve will require primary containment to be breached. Based on the plant conditions needed to

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perform the work, the repairs to 2CM023B will be made at the next reasonable opportunity, no later than the next Unit 2 refueling outage, currently scheduled for Spring 2007. The valve repair effort has also been placed in the LaSalle County Station Unit 2 forced outage plan to allow for earlier repairs in the event the Unit executes an outage of sufficient duration to restore 2CM023B to an operable status prior to the next refueling outage. Repairing 2CM023B will allow the 2PL77J manual isolation valve to be reopened to restore the Division 2 H₂/O₂ PAM instrumentation to an operable status.

The Division 1 Drywell H₂/O₂ Monitoring instruments remain operable and fully capable of monitoring the drywell atmosphere under post accident conditions. In addition, on April 22, 2005, the NRC issued Amendment 158 to Facility Operating License NPF-18 to delete the TS requirements to maintain hydrogen recombiners and hydrogen/oxygen monitors. The amendment adopts the revised 10 CFR 50.44 Combustible Gas Control requirements relaxing the safety classifications and licensee commitments to certain design and qualification requirements for hydrogen and oxygen monitors. The Safety Evaluation accompanying the amendment allows the hydrogen and oxygen monitors to be relocated to the Technical Requirements Manual and relaxes the Regulatory Guide (RG) 1.97 hydrogen/oxygen concentration variable classifications from Category 1 to Category 2 for the oxygen monitors and Category 3 for the hydrogen monitors. Based on this relaxation and the regulatory positions in RG 1.97 which only require instruments monitoring Category 1 variables to be designed with redundancy capable of accommodating a single failure, the remaining operable Division of Drywell H₂/O₂ PAM instruments provides adequate monitoring of the drywell atmosphere.

Should you have any questions concerning this letter, please contact Mr. Terrence W. Simpkin, at (815) 415-2800.

Respectfully,



for Susan R. Landahl
Site Vice President
LaSalle County Station

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