

RS-05-172

10 CFR 50.90

December 22, 2005

U. S. Nuclear Regulatory Commission
ATTN: 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: Additional Information Supporting the License Amendment Request to Extend the Completion Times Related to Technical Specifications associated with Residual Heat Removal Service Water, Diesel Generator Cooling Water and the Opposite Unit Division 2 Diesel Generator

- References:
1. Letter from J. A. Bauer (Exelon Generation Corporation, LLC) to U.S. NRC, "Request for a License Amendment to Extend the Completion Times Related to Technical Specifications associated with Residual Heat Removal Service Water, Diesel Generator Cooling Water and the Opposite Unit Division 2 Diesel Generator," dated April 13, 2005
 2. Letter from U.S. NRC to C. M. Crane (Exelon Generation Corporation, LLC), "LaSalle County Power Station, Units 1 and 2 – Request for Additional Information Related to Amendment Request," dated December 7, 2005

In Reference 1, Exelon Generation Company, LLC, (EGC), requested an amendment to Appendix A, Technical Specifications (TS), of Facility Operating License Nos. NPF-11 and NPF-18 for LaSalle County Station Units 1 and 2 respectively. Specifically, the proposed changes modify the Completion Time for TS Sections 3.7.1, "Residual Heat Removal Service Water (RHRSW) System," 3.7.2, "Diesel Generator Cooling Water (DGCW) System," and 3.8.1, "AC Sources – Operating." The proposed extensions of the Completion Times will only be used during the specified unit refueling outages.

In Reference 2, the NRC requested additional information to complete the review of the license amendment. This request pertained to what functions would be affected during each phase of the repairs, what compensatory measures would be in place during each phase of the repairs including any regulatory commitments established to implement the compensatory actions, and why the proposed change was not requested on a permanent basis.

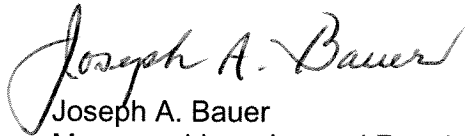
Attachment 1 of this letter provides the requested information.

EGC has reviewed the information supporting a finding of no significant hazards consideration that was previously provided to the NRC in Attachment 1 of Reference 1. The supplemental information provided in this submittal does not affect the bases for concluding that the proposed license amendment does not involve a significant hazards consideration.

Regulatory commitments are documented in Attachment 2 of this letter. Should you have any questions concerning this letter, please contact Ms. Alison Mackellar at (630) 657-2817.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 22nd day of December 2005.

Respectfully,

A handwritten signature in cursive script that reads "Joseph A. Bauer". The signature is written in black ink and is positioned above the printed name and title.

Joseph A. Bauer
Manager, Licensing and Regulatory Affairs

Attachment 1: Response to Request for Additional Information
Attachment 2: Regulatory Commitments for LaSalle County Station

ATTACHMENT 1
Response to Request for Additional Information

Question No. 1

Provide a complete description of what functions will be affected during each phase of repair.

- (a) What compensatory measures will be taken during each phase of the repair in order to maintain the capability to perform the function that is affected, and
- (b) what regulatory commitments will be established to implement the compensatory actions that are being credited?

Response

1. *Provide a complete description of what functions will be affected during each phase of repair.*

When Division 1 valves are replaced during Unit 1 Refueling Outage 11 (L1R11), the following systems will be inoperable; (note that the current affected Technical Specification (TS) are also identified):

- U-2 Division 1 Residual Heat Removal Service Water (RHRSW), TS 3.7.1
- U-2 Division 1 Diesel Generator Cooling Water (DGCW), TS 3.7.2
- U-1 Division 1 Diesel Generator, TS 3.8.2
- U-2 Division 1 Diesel Generator, TS 3.8.1
- U-2 Division 1 Residual Heat Removal (RHR) Suppression Pool Cooling Subsystem, TS 3.6.2.3
- U-1 Division 1 Emergency Core Cooling Systems (ECCS), TS 3.5.2
- U-2 Division 1 ECCS, TS 3.5.1
- U-2 Division 1 RHR Suppression Pool Spray Subsystem, TS 3.6.2.4
- U-1 Hydrogen Recombiner for U-2, (no TS associated with this component)
- U-2 Reactor Core Isolation Cooling (RCIC), TS 3.5.3
- U-1 Division 1 Emergency Fuel Pool Makeup Pump, (no TS associated with this component)
- U-2 Division 1 Emergency Fuel Pool Makeup Pump, (no TS associated with this component)

ATTACHMENT 1
Response to Request for Additional Information

- U-1 Division 1 RHR Shutdown Cooling System, TS 3.4.10, 3.9.8, 3.9.9

When Division 2 valves are replaced during the Unit 2 Refueling Outage 11 (L2R11), the following systems will be inoperable; (note that the current affected TS are also identified):

- U-1 Division 2 RHRSW, TS 3.7.1
- U-1 Division 2 DGCW, TS 3.7.2
- U-1 Division 2 Diesel Generator, TS 3.8.1
- U-2 Division 2 Diesel Generator, TS 3.8.2
- U-1 Division 2 RHR Suppression Pool Cooling Subsystem, TS 3.6.2.3
- U-1 Division 2 RHR Suppression Pool Spray Subsystem, TS 3.6.2.4
- U-1 Division 2 ECCS, TS 3.5.1
- U-2 Division 2 ECCS, TS 3.5.2
- U-1 Hydrogen Recombiner for U-1, (no TS associated with this component)
- U-1 Division 2 Emergency Fuel Pool Makeup Pump, (no TS associated with this component)
- U-2 Division 2 Emergency Fuel Pool Makeup Pump, (no TS associated with this component)
- U-2 Division 2 RHR Shutdown Cooling System, TS 3.4.10, 3.9.8, 3.9.9

When Division 2 valves are replaced during the Unit 1 Refueling Outage 12 (L1R12), the following systems will be inoperable; (note that the current affected TS are also identified):

- U-2 Division 2 RHRSW, TS 3.7.1
- U-2 Division 2 DGCW, TS 3.7.2
- U-1 Division 2 Diesel Generator, TS 3.8.2
- U-2 Division 2 Diesel Generator, TS 3.8.1
- U-2 Division 2 RHR Suppression Pool Cooling Subsystem, TS 3.6.2.3

ATTACHMENT 1
Response to Request for Additional Information

- U-2 Division 2 RHR Suppression Pool Spray Subsystem, TS 3.6.2.4
- U-1 Division 2 ECCS, TS 3.5.2
- U-2 Division 2 ECCS, TS 3.5.1
- U-2 Hydrogen Recombiner for U-2, (no TS associated with this component)
- U-1 Division 2 Emergency Fuel Pool Makeup Pump, (no TS associated with this component)
- U-2 Division 2 Emergency Fuel Pool Makeup Pump, (no TS associated with this component)
- U-1 Division 2 RHR Shutdown Cooling System, TS 3.4.10, 3.9.8, 3.9.9

(a) *What compensatory measures will be taken during each phase of the repair in order to maintain the capability to perform the function that is affected?*

When Division 1 valves are replaced during L1R11, the following list of protected equipment will not be scheduled for maintenance, (i.e., will remain available), during the extended completion times:

- Unit 2 Division 2 4kv Bus 242Y
- Unit 2 Division 2 Emergency Diesel Generator
- Unit 2 Division 2 Main Battery Charger
- Unit 2 Division 2 Core Standby Cooling System (CSCS)
- Unit 2 Division 2 RHR
- Unit 2 Division 3 HPCS
- Unit 2 Motor Driven Reactor Feedwater Pump

To minimize the impact on fire risk, a fire watch will be posted at the Unit 2 Division 2 Essential Switchgear Room during L1R11.

When Division 2 valves are replaced during L2R11 and L1R12, no compensatory measures are needed during the proposed work. The use of the non-code line stops will maintain the availability of the online unit's Division 2 systems.

In addition, the Division 1 and 2 maintenance will be performed with a number of controls in place (i.e., consistent with LaSalle County Station (LSCS) procedures and practices) to reduce errors and minimize risk. These controls are summarized in Section 4.3.2 of Reference 1.

LSCS Special Procedure (LLP 2005-005), "Unit One – Division One CSCS Draining," has been developed for L1R11 and specifically documents the required

ATTACHMENT 1
Response to Request for Additional Information

compensatory measures listed above. Attachment D of this procedure, (also given in Table 4 of Reference 1), specifies the protected equipment during the Division 1 CSCS work.

(b) What regulatory commitments will be established to implement the compensatory actions that are being credited?

Exelon Generation Corporation, LLC, (EGC) is making a regulatory commitment to implement the below administrative controls and actions and will annotate these specific procedure steps as regulatory commitments. The regulatory commitments are described below and summarized in Attachment 2.

The administrative controls/actions that are to be in place in accordance with Reference 1 are documented in the steps below from LLP 2005-005 for Division 1 during L1R11.

- Additional administrative controls/actions to protect equipment listed on Attachment D of LLP 2005-005, (also given in Table 4 of Reference 1), will be taken in accordance with station risk management procedures while Division 1 CSCS remains inoperable. The administrative actions include physical barricades to segregate protected equipment, posted signs and enhanced plant personnel awareness through pre-job briefings and outage communication bulletins.
- A qualified fire watch will be posted in the Unit 2 Division 2 Essential Switchgear Room while Division 1 CSCS remains inoperable.
- EGC is also making a regulatory commitment to install the non-code line stops required to isolate the Unit 1 portion of the common discharge header from the Unit 2 portion of the header. The non-code line stops are designed to the same pressure rating and seismic requirements as the CSCS piping and will maintain the availability of the online unit's Division 2 CSCS system. The regulatory commitment for installation of the non-code line stops for L1R12 and L2R11 will be documented in LLP 2006-001, "Unit One – Division Two CSCS Draining," for Unit 1 Division 2 and LLP 2006-002, "Unit Two – Division Two CSCS Draining," for Unit 2 Division 2.

Question No. 2

Provide an explanation, on the docket, why the proposed changes cannot be proposed as permanent changes to the Technical Specification requirements, or

- (a) why such permanent changes would otherwise be inappropriate; and
- (b) why continuing "one-time" changes of this nature will not be required in the future.

ATTACHMENT 1
Response to Request for Additional Information

Response

The proposed change was not requested on a permanent basis because it was determined that the current situation has a low probability of recurrence and a permanent change is considered unnecessary. The failure mode is well understood and is being mitigated by the replacement valves that are constructed of material that is less susceptible to the extensive corrosion currently experienced. The existing Completion Times have proven to be adequate for other necessary maintenance, and it is only due to our desire to correct the degraded condition as expeditiously as possible that this request is being made. The current preventive maintenance practices, coupled with the more resilient material of the replacement valves, are expected to preclude future degradation that is currently being experienced. Additionally, the risk assessment performed to support this request assumed a one-time evolution, and did not consider a permanent extension of the Completion Time for each of the three refueling outages as documented in Reference 1.

ATTACHMENT 2
Response to Request for Additional Information

REGULATORY COMMITMENTS FOR LASALLE COUNTY STATION

The following table identifies those actions committed to by Exelon Generation Company, LLC (EGC) in this document. Any other statements in this submittal are provided for information purposes and are not considered to be regulatory commitments. Please direct questions regarding these commitments to Alison Mackellar at (630) 657-2817.

Regulatory Commitments	Due Date / Event
<p>Additional administrative controls/actions to protect equipment listed on Attachment D of LLP 2005-005, (also given in Table 4 of Reference 1), will be taken in accordance with station risk management procedures while Division 1 CSCS remains inoperable. The administrative actions include physical barricades to segregate protected equipment, posted signs and enhanced plant personnel awareness through pre-job briefings and outage communication bulletins</p>	<p>Implemented by procedure while Division 1 CSCS remains inoperable during L1R11</p>
<p>A qualified fire watch will be posted in the Unit 2 Division 2 Essential Switchgear Room</p>	<p>Implemented by procedure while Division 1 CSCS remains inoperable during L1R11</p>
<p>Installation of non-code line stops to isolate the Unit 1 portion of the common discharge header from the Unit 2 portion of the header. The non-code line stops are designed to the same pressure rating and seismic requirements as the CSCS piping and will maintain the availability of the online unit's Division 2 CSCS system.</p>	<p>The regulatory commitments for installation of the non-code line stops for L1R12 and L2R11 will be documented by specific procedures for Unit 1 Division 2 and Unit 2 Division 2 CSCS maintenance</p>