

March 12, 2007

LICENSEE: EXELON GENERATION COMPANY, LLC
FACILITY: LASALLE COUNTY STATION, UNITS 1 AND 2
SUBJECT: SUMMARY OF JANUARY 26, 2007, PRE-APPLICATION MEETING WITH EXELON, FOR GANGED ROD WITHDRAWAL AND ULTIMATE HEAT SINK AMENDMENT DENIAL

On January 26, 2007, a Category 1 public meeting was held between the U.S. Nuclear Regulatory Commission (NRC) and representatives of Exelon Generation Company (EGC) at NRC Headquarters, One White Flint North, 11555 Rockville Pike, Rockville, Maryland. The purpose of the meeting was to discuss the licensee's plan for re-submittal of the proposed license amendment request (LAR), to change the licensing basis to allow ganged rod drive capability of the rod control management system (RCMS). The LAR was first submitted to the NRC staff on March 15, 2006, with supplements dated May 10 and June 1, 2006. The LAR was subsequently withdrawn on July 31, 2006.

The NRC staff also met with EGC's licensing and technical representatives to discuss their ultimate heat sink (UHS) amendment request for LaSalle County Station, Units 1 and 2 (LaSalle), and the NRC staff's subsequent denial of that request. The original LAR was submitted on March 13, 2006, with supplemental letters for additional information dated June 15, July 13, and August 4, 2006, as well as two telecon discussions to clarify the additional information. On January 24, 2007, EGC submitted a letter to NRC in response to the November 3, 2006, denial of the UHS amendment request for LaSalle. However, the NRC staff had not had an opportunity to evaluate the letter due to the timing of the response with respect to the meeting and was not able to discuss the response to the denial. A written response to EGC is pending.

RCMS AMENDMENT

EGC presented slides to include an outline of the draft LAR, as well as information regarding the technical and regulatory basis for the planned RCMS submittal, scope and level of detail, and necessary regulatory requirements necessary for the LAR approval.

During the discussion, the NRC staff conveyed to EGC that a number of documents and information would need to be submitted and/or augmented beyond EGC's previous submittal.

The following is a list of some of the documents to be included in the new LAR submittal:

- A software V&V (verification and validation) plan
- Software design specifications and requirements
- Software safety/cyber security plan
- Software quality assurance, management, and development
- Training, operations, and maintenance plans

- Safety analysis (requirements, V&V, design, integration)
- Software and hardware descriptions
- Description of how, and to what extent the new RCMS displays and controls are used for Regulatory Guide 1.97 and emergency operating plan purposes
- Analysis of the potential single failures that could result in the uncontrolled withdrawal of a rod gang
- Failure modes and effects analysis
- No significant hazards consideration needs to include analysis of Section 15 (NUREG-0800) accidents, which involve control rod movement
- The LAR must include specific warranty from General Electric (GE) as to the completeness and accuracy of the information, for any GE documents

ULTIMATE HEAT SINK

The meeting on January 26, 2007, also included a presentation by EGC regarding the UHS submittal and the NRC staff's subsequent denial of that LAR. The reason for EGC's initial amendment request for LaSalle, was to increase the technical specification (TS) temperature limit for the UHS. LaSalle often experiences higher than average temperatures in the summer and often is close to the TS limit of 100°F for the UHS. The original amendment sought to increase the UHS TS temperature limit to 101.5°F by installing high accuracy reference temperature detectors (RTDs). On November 3, 2006, the NRC sent a letter to EGC denying the LAR and concluded that the requested modifications to the TSs were not supported by the analysis provided by EGC.

This meeting on January 26, 2007, provided both the NRC staff and EGC an opportunity to review the NRC staff's safety evaluation denying the LAR with respect to EGC's original March 13, 2006, request. In addition to evaluating the original LAR and the NRC's safety evaluation, the approach was to discuss the UHS licensing basis, the plant design for the circulating water system and temperature instrumentation, the procedures LaSalle uses to evaluate UHS temperatures, and discuss the regulatory approach to resolving the issue. At the end of the discussion, the NRC staff indicated that a follow-on meeting with EGC would be beneficial. The follow-on meeting would completely address the concerns the NRC staff had raised in its safety evaluation and work toward a resolution of issues and a path to success for the proposed new LAR.

Action items were identified for both the NRC staff and EGC to address before the next meeting. The NRC staff will evaluate EGC's response to the denial including, regulatory basis, graded approach to setpoint methodology, and clarify the review for non-limiting safety system set points. The NRC staff also agreed to engage the TS Branch to review if the TS Bases is the proper vehicle to address the circumstance where 3 of 4 RTD's are out of service. The follow-up meeting to resolve any differences and review the action items is projected for the March 21 through March 28, 2007, time frame.

Public Meeting Feedback forms were available to be passed out, but none were received.

Please direct any inquiries to me at 301-415-3154, or [sps1@nrc.gov].

/RA/

Stephen P. Sands, Project Manager
Plant Licensing Branch III-2
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-373 and 50-374

Enclosures: 1. List of Attendees
2. Licensee Handout

cc w/encls: See next page

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