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LaSalle County Station  
2601 North 21<sup>st</sup> Road  
Marseilles, IL 61341-9757

RA08-089

December 5, 2008

U.S. Nuclear Regulatory Commission  
Attention: Document Control Desk  
Washington, D.C. 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: 2007 Regulatory Commitment Change Summary Report

Enclosed is the Exelon Generation Company, LLC, (EGC), 2007 commitment change summary for LaSalle County Station. Revisions to docketed correspondence were processed using the Nuclear Energy Institute's (NEI) 99-04, Revision 0, "Guidelines for Managing NRC Commitment Changes," dated July 1999.

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

Respectfully,



David P. Rhoades  
Plant Manager  
LaSalle County Station

Attachment

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

ADD  
NRR

**2007 LaSalle County Station Commitment Change Summary**

Commitment Change Tracking Number	Date of Commitment Change	Original Document	Original Commitment	Changed Commitment	Basis for Change
06-001	1/5/2007	NUREG 0519 Safety Evaluation Report for LaSalle County Station (LSCS), UFSAR Section 6.2.6.2 Hydrostatic Testing of Containment Isolation Valves	<p>10 CFR Part 50 Appendix J requires that valves, unless pressurized with fluid from a seal system, shall be pressurized with air or nitrogen for leak testing purposes (see paragraph III.C.2). There are a number of liquid filled systems that are specifically designed to remain intact following a loss-of-coolant accident and thus, provide a water seal for the system isolation valves or assure that only liquid leakage from containment will occur. LSCS performs hydrostatic testing to determine the leak tightness of the following isolation valves:</p> <ol style="list-style-type: none"> <li>1.) RHR / low pressure core injection, HPCS, LPCS and RCIC suction valves.</li> <li>2.) ECCS and RCIC relief valve discharges.</li> <li>3.) ECCS and RCIC pump test and minimum flow valves.</li> <li>4.) RHR / RCIC head spray valves.</li> </ol> <p>For the above systems, a liquid inventory will produce a water seal during the post accident period and only liquid leakage from the containment will occur. Two hydrostatic tests will be performed. In the first test, the system including the valves identified above will be pressurized to determine their leak tightness. The second hydrostatic test will be performed by pressurizing the remaining systems. The combined leakage from all these valves will satisfy the acceptance criteria of 10 CFR Part 100 regarding the site radiological safety analysis and will be included in the plant technical specifications. This leakage will be excluded when determining the combined leakage rate for all penetrations and valves as specified in III.C.3 of Appendix J.</p> <p>The NRC review of this proposal concluded that such testing is permissible for the lines identified above since the applicant has shown the:</p> <ol style="list-style-type: none"> <li>1.) Existence of water seal,</li> <li>2.) System boundaries are designed to engineered safety feature criteria, and</li> <li>3.) Acceptance criteria of 10 CFR 100 is satisfied.</li> </ol>	<p>The current hydrostatic test is a maintenance activity that is being performed to fulfill a regulatory commitment. This regulatory commitment is related to the NRC's initial licensing approval of the penetrations under GDC 56. The regulatory commitment required "leak testing" of these penetrations. This testing is also described in Technical Specification SR 3.6.1.3.11. The commitment and SR requirements will be fulfilled by LaSalle's Leak Reduction and Control Program in the future.</p>	<p>The basis for the change is as follows (Reference: Engineering Change Evaluation #363056):</p> <ol style="list-style-type: none"> <li>1.) This effort involves the alteration of a hydrostatic test / surveillance, which is a maintenance activity (the testing is being replaced by testing controlled by procedure, LTS-300-7).</li> <li>2.) The hydrostatic test formed part of the alternative basis that supported the classification of the affected penetrations under GDC 56 during the initial licensing process.</li> <li>3.) The hydrostatic test was never intended to satisfy a "Type C Test" as described in 10 CFR 50, Appendix J.</li> <li>4.) The penetrations involved do not require a "Type C Test" as defined in 10 CFR 50, Appendix J.</li> <li>5.) Procedure LTS-300-7 provides superior control of external leakage.</li> </ol>

**2007 LaSalle County Station Commitment Change Summary**

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06-004	2/7/2007	GL 89-13	<p>Perform FC Heat Exchanger testing to verify the heat transfer capability.</p> <p>The FC heat exchanger performance monitoring at LaSalle consists of the following key elements:</p> <ol style="list-style-type: none"> <li>1.) Thermal Performance Testing</li> <li>2.) Tube-side Clean and Inspect</li> <li>3.) Tube-side Eddy Current Testing</li> <li>4.) Component Flushing</li> <li>5.) Shell-side Flow Verification</li> <li>6.) Cooling Water Flow Verification</li> </ol>	The same heat exchanger performance monitoring from the original commitment is performed with emphasis on an alternative maintenance program supplemented by heat transfer testing.	The change is being made to clarify that the FC heat exchangers follow an alternative maintenance program supplemented by heat transfer testing. GL 89-13 under Action II allows alternative actions such as frequent regular maintenance of a heat exchanger in lieu of testing to verify the heat transfer capability of a heat exchanger. As documented in EC 362565, thermal performance testing is not required to validate the continued health of each heat exchanger. The testing is supplemental to the inspections and provides supporting information and additional confidence of optimum heat exchanger performance.
07-001	4/4/2007	GL 94-03 / ComEd Letter from Gary G. Benes to the U.S. Nuclear Regulatory Commission dated May 5, 1995, L2R06 Core Shroud Inspection Results	ComEd is committed to the BWRVIP. ComEd has been, and will continue to be an integral part of the BWRVIP. LaSalle County Station will follow the guidance provided by the BWRVIP with respect to flaw assessment, inspection, and repair options as this guidance is provided, and if it should be subsequently revised.	BWRVIP-94, Revision 1 "BWR Vessel and Internals Project; Program Implementation Guide," 1011702, Final Report, December 2005, defines the commitment.	Continued compliance with the guidance in the BWRVIP documents for inspection, repair, evaluation and program implementation ensures a consistent industry methodology for assessing reactor internals issues. The

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				<p>Section 1.4 defines Utility Requirements with respect to the BWRVIP, "The BWRVIP utility commitments to the NRC to implement BWRVIP guidance are described in letters in Appendix A."</p> <p>Appendix A contains two letters, BWRVIP Letter 97-461 and BWRVIP Letter 97-870:</p> <p>A.) BWRVIP Letter 97-461 is from the BWRVIP to the U.S. Nuclear Regulatory Commission dated May 30, 1997 and states "the U.S. BWRVIP utility members unanimously concur with the following renewed commitments:</p> <ol style="list-style-type: none"> <li>1.) We will continue to provide financial and technical resources needed to complete the BWRVIP Program Plan.</li> <li>2.) We will actively participate in completing the BWRVIP Program Plan.</li> <li>3.) We will implement the BWRVIP products at each of our plants as appropriate considering individual plant schedules, configurations and needs.</li> <li>4.) If a plant does not</li> </ol>	<p>appropriate guidance documents are provided to the NRC for their review and concurrence. Involvement of the BWRVIP and NRC provides additional reviews and assurances that the structures, systems and components will remain capable of performing their safety functions.</p>
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## 2007 LaSalle County Station Commitment Change Summary

				<p>implement the applicable BWRVIP products, the plant will provide timely notification to the NRC staff.</p> <p>5.) We will continue to work closely with the NRC staff to the successful and timely conclusion of the BWRVIP Program Plan.”</p> <p>Attachment 1 to BWRVIP Letter 97-461 lists the U.S. BWRVIP Utility Members, and ComEd is included in the list.</p> <p>B.) BWRVIP Letter 97-870 is from the BWRVIP to the U.S. Nuclear Regulatory Commission dated October 30, 1997, and clarifies commitment 4 in BWRVIP Letter 97-461. If the NRC staff conditionally approves a BWRVIP document, the BWRVIP will inform the NRC of this situation within 45 days of the NRC approval of the document.</p>	
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