

RS-11-009

January 24, 2011

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 License Amendment Request Regarding the Use of Neutron Absorbing Inserts in Unit 2 Spent Fuel Pool Storage Racks

- References:
1. Letter from P. R. Simpson (Exelon Generation Company, LLC) to U.S. NRC, "License Amendment Regarding the Use of Neutron Absorbing Inserts in Unit 2 Spent Fuel Pool Storage Racks," dated October 5, 2009
  2. Letter from E. A. Brown (U.S. NRC) to M. J. Pacilio (Exelon Nuclear), "LaSalle County Station, Units 1 and 2 – Proposed License Conditions Related to Use of Neutron Absorbers (TAC Nos. ME2376 and ME2377)," dated January 24, 2011
  3. Letter from P. R. Simpson (Exelon Generation Company, LLC) to U.S. NRC, "Additional Information Supporting License Amendment Request Regarding the Use of Neutron Absorbing Inserts in Unit 2 Spent Fuel Pool Storage Racks," dated June 10, 2010

In Reference 1, Exelon Generation Company, LLC (EGC) requested an amendment to Facility Operating License Nos. NPF-11 and NPF-18 for LaSalle County Station (LSCS), Units 1 and 2, respectively. The proposed change revises Technical Specifications (TS) Section 4.3.1, "Criticality," to address a non-conservative TS. Specifically, the proposed change addresses the BORAFLEX™ degradation issue in the Unit 2 spent fuel storage racks by revising TS Section 4.3.1 to allow the use of NETCO-SNAP-IN® rack inserts in Unit 2 spent fuel storage rack cells as a replacement for the neutron absorbing properties of the existing BORAFLEX™ panels.

In Reference 2, the NRC described proposed license conditions that will be necessary to address the crediting of boron (i.e., in BORAFLEX™) in the LSCS Unit 2 spent fuel storage racks during the interim period until NETCO-SNAP-IN® rack inserts are loaded in all accessible storage rack cells. Reference 2 requested EGC to provide a response indicating EGC's

understanding and acceptance of the license conditions. EGC has reviewed the proposed license conditions, and understands that the NRC plans to issue license conditions as described in Reference 2.

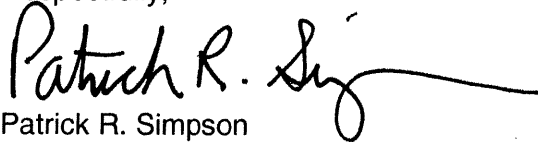
In addition, during recent discussions the NRC requested EGC to submit the data and analysis associated with the first 10-year surveillance of the NETCO-SNAP-IN® rack inserts. Details regarding the NETCO-SNAP-IN® rack insert surveillance program are discussed in References 1 and 3. EGC will submit the requested information within 60 days following completion of the analysis.

EGC has reviewed the information supporting a finding of no significant hazards consideration, and the environmental consideration, that were previously provided to the NRC in Attachment 1 of Reference 1. The additional information provided in this submittal does not affect the bases for concluding that the proposed license amendment does not involve a significant hazards consideration. In addition, the additional information provided in this submittal does not affect the bases for concluding that neither an environmental impact statement nor an environmental assessment needs to be prepared in connection with the proposed amendment.

Regulatory Commitments are contained in the Attachment to this letter. Should you have any questions concerning this letter, please contact Mr. Kenneth M. Nicely at (630) 657-2803.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 24th day of January 2011.

Respectfully,

A handwritten signature in black ink, appearing to read "Patrick R. Simpson", followed by a long horizontal flourish.

Patrick R. Simpson  
Manager – Licensing

Attachment:  
Summary of Regulatory Commitments

cc: NRC Regional Administrator, Region III  
NRC Senior Resident Inspector – LaSalle County Station  
Illinois Emergency Management Agency – Division of Nuclear Safety

**ATTACHMENT**  
**Summary of Regulatory Commitments**

The following list identifies those actions committed to by Exelon Generation Company, LLC, (EGC) in this submittal. Any other actions discussed in the submittal represent intended or planned actions by EGC, are described only for information, and are not regulatory commitments.

| <b>COMMITMENT</b>  | <b>COMMITTED DATE<br/>OR "OUTAGE"</b>               | <b>COMMITMENT TYPE</b>                  |  |
|--|---|---|--|
|  |   | <b>ONE-TIME<br/>ACTION<br/>(YES/NO)</b> | <b>PROGRAM-<br/>MATIC<br/>(YES/NO)</b> |
| EGC will submit the data and analysis associated with the first 10-year surveillance of the NETCO-SNAP-IN® rack inserts. | Within 60 days following completion of the analysis | Yes                                     | No                                     |