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U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 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 Application for Technical Specification Change Regarding Risk-Informed Justification for the Relocation of Specific Surveillance Frequency Requirements to a Licensee Controlled Program

References:

1. Letter from P. R. Simpson (Exelon Generation Company, LLC) to U.S. NRC, "Application for Technical Specification Change Regarding Risk-Informed Justification for the Relocation of Specific Surveillance Frequency Requirements to a Licensee Controlled Program (Adoption of TSTF-425, Revision 3)," dated February 15, 2010

2. Letter from C. Gratton (U.S. NRC) to M. J. Pacilio (Exelon Nuclear), "LaSalle County Station, Units 1 and 2 – Request for Additional Information Related to the Risk-Informed Relocation of Specific Surveillance Frequency Requirements (TAC Nos. ME3363 and ME3364)," dated July 21, 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 modifies the LSCS Technical Specifications (TS) by relocating specific surveillance frequencies to a licensee-controlled program. The NRC requested additional information to support review of the proposed change in Reference 2. In response to this request, EGC is providing the attached information.

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 Attachments 6 and 1, respectively, 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.

There are no regulatory commitments contained in 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 3rd day of August 2010.

Respectfully,

Patrick R. Simpson
Manager – Licensing

Attachment: Response to Request for Additional Information

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

ATTACHMENT
Response to Request for Additional Information

NRC Request

In the application, the licensee included an evaluation of proposed changes in Attachment 1. Attachment 1, Item #3 in the application stated the following:

> The insert provided in TSTF-425 to replace text describing the basis for each Frequency relocated to the Surveillance Frequency Control Program has been revised from, "The Surveillance Frequency is based on operating experience, equipment reliability, and plant risk and is controlled under the Surveillance Frequency Control Program," to read "The Frequency may be based on factors such as operating experience, equipment reliability, or plant risk, and is controlled under the Surveillance Frequency Control Program." This deviation is necessary to reflect the LSCS basis for frequencies that do not, in all cases, base Frequency on operating experience, equipment reliability, and plant risk.

TSTF-425, Revision 3, "Relocate Surveillance Frequencies to Licensee Control – RITSTF Initiative 5b," (ADAMS Accession Nos. ML090850627, ML090850630, ML090850638, and ML090850640) was approved by Notice of Availability published in the *Federal Register* on July 6, 2009. TSTF-425, Rev. 3 involves the relocation of most time-based surveillance frequencies to a licensee controlled program, called the Surveillance Frequency Control Program (SFCP), and adds the SFCP to the administrative controls section of the technical specifications (TSs). The SFCP does not include surveillance frequencies that are event driven, controlled by an existing program, or are condition-based.

Part of the TSTF-425 change to NUREG 1430 – 1434 (Standard Technical Specifications) provides an optional insert (INSERT #2) to the existing TS Bases to facilitate adoption of the TSTF while retaining the existing NUREG TS Surveillance Frequency TS Bases for licensees not choosing to adopt TSTF-425. The TSTF-425 TS Bases INSERT #2 states:

> *The Surveillance Frequency is based on operating experience, equipment reliability, and plant risk and is controlled under the Surveillance Frequency Control Program.*

Several licensees requesting license amendments to adopt TSTF-425 have identified a need to deviate from this statement because it only applies to Frequencies that have been changed in accordance with the Surveillance Frequency Control Program (SFCP) and does not apply to Frequencies that are relocated but not changed.

The NRC staff agrees that the TSTF-425 TS Bases insert applies only to relocated SFs that are subsequently evaluated and changed in accordance with the SFCP, and that the current insert does not apply to SFs relocated to the SFCP but remain unchanged. For SFs relocated to the SFCP but not subsequently changed in accordance with the program, the existing TS Bases description remains valid Bases for these SFs.

One option to address this concern for those instances where the licensee used TSTF-425 Insert 2, is to modify the wording used in the application as follows:

> *"The Surveillance Frequency is controlled under the Surveillance Frequency Control Program"*

In addition, the following statement should be included regarding SF Bases relocated to the SFCP:

> *"The existing Bases information describing the basis for the Surveillance Frequency will be relocated to the licensee-controlled Surveillance Frequency Control Program."*

It should be noted that only the Bases for the SF can be relocated to the SFCP. The Bases for the TS Surveillance will remain in the TS Bases and should not be relocated to the SFCP.

EGC's application for LSCS dated February 15, 2010, included the aforementioned deviations from the proposed language in TSTF-425, Revision 3. The NRC staff has reviewed the proposed deviation from TSTF-425 and requests that the licensee modify the application as described above, or develop an alternate resolution to the issue with Insert #2 described herein, and include appropriate justifications.

Response

The proposed change described in Reference 1 requests NRC approval to relocate SFs to the SFCP. Upon implementation of the proposed change, the existing TS Bases information describing the basis for the SF will be relocated to the licensee-controlled SFCP. This will ensure that the information describing the bases for unchanged SFs is maintained.

As discussed in Reference 1, EGC proposed a variation from TSTF-425 that replaced text describing the basis for each SF relocated to the SFCP. This variation was necessary because, independent of whether SFs have been changed under the SFCP, the SFs are not, in all cases, based on operating experience, equipment reliability, and plant risk.

As required by proposed TS Section 5.5.16, "Surveillance Frequency Control Program," subsequent changes to the SFs listed in the SFCP will be made in accordance with the NRC-endorsed methodology described in Nuclear Energy Institute (NEI) 04-10, "Risk-Informed Method for Control of Surveillance Frequencies," Revision 1. NEI 04-10 provides the methodology to identify, assess, implement, and monitor proposed changes to SFs. NEI 04-10 identifies the need to address both quantitative and qualitative considerations when changing SFs. As discussed in Section 4.0, Step 7, qualitative considerations include vendor-specified maintenance frequency, test intervals specified in applicable industry codes and standards, impact on defense-in-depth protection, and the existence of alternate testing of structures, systems, and components (SSCs) affected by the change. These qualitative considerations provide examples of instances where SFs changed under the SFCP may not be based upon operating experience, equipment reliability, or plant risk.

As a result, EGC's proposed variation from TSTF-425 provides wording that more accurately reflects the methodology described in NEI 04-10. However, in order to avoid future confusion regarding this issue, EGC will replace the Bases text insert proposed in Reference 1 (i.e., "The Frequency may be based on factors such as operating experience, equipment reliability, or plant risk, and is controlled under the Surveillance Frequency Control Program") with a revised insert that reads "The Surveillance Frequency is controlled under the Surveillance Frequency Control Program." This change to the Bases text insert will be made upon implementation of the proposed change.

ATTACHMENT
Response to Request for Additional Information

Reference

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