

RS-11-157

10 CFR 50.90

October 26, 2011

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

LaSalle County Station, Unit 2
Facility Operating License No. NPF-18
NRC Docket No. 50-374

Subject: License Amendment Request Regarding the Use of Neutron Absorbing Inserts in Unit 2 Spent Fuel Pool Storage Racks and the Timeline for Implementation

In accordance with 10 CFR 50.90, "Application for amendment of license, construction permit, or early site permit," Exelon Generation Company, LLC (EGC) requests an amendment to Facility Operating License No. NPF-18 for LaSalle County Station (LSCS), Unit 2. The proposed change is necessary to reflect an accelerated installation schedule of the NETCO-SNAP-IN® inserts in the Unit 2 spent fuel storage rack cells. Specifically, the change revises license condition 2.C.(32) to require the installation of NETCO-SNAP-IN® inserts to be completed no later than December 31, 2012. In addition, license condition 2.C.(31) is revised to apply until March 31, 2012, and a new license condition 2.C.(34) is being proposed to prohibit fuel storage after March 31, 2012, in spent fuel pool storage rack cells that have not been upgraded with the NETCO-SNAP-IN® inserts.

This request is subdivided as follows.

- Attachment 1 provides a description and evaluation of the proposed change.
- Attachment 2 provides a markup of the affected Operating License pages.
- Attachment 3 provides a listing of regulatory commitments made in this submittal.

The proposed change has been reviewed by the LSCS Plant Operations Review Committee and approved by the Nuclear Safety Review Board in accordance with the requirements of the EGC Quality Assurance Program.

EGC requests approval of the proposed change by October 26, 2012. In the interim, EGC plans to continue maintaining the administrative controls that were previously put in place to prevent loading spent fuel in the spent fuel storage rack cells that are unusable. Once approved, the amendment will be implemented within 30 days. This implementation period will provide adequate time for the affected station documents to be revised using the appropriate change control mechanisms.

In accordance with 10 CFR 50.91, "Notice for public comment; State consultation," paragraph (b), EGC is notifying the State of Illinois of this application for license amendment by transmitting a copy of this letter and its attachments to the designated State Official.

Regulatory commitments are listed in Attachment 3 of this letter. Should you have any questions concerning this letter, please contact Mr. Thomas J. Griffith at (630) 657-2818.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 26th day of October 2011.

Respectfully,



Patrick R. Simpson
Manager – Licensing

Attachments:

1. Evaluation of Proposed Change
2. Markup of Proposed Operating License Pages
3. 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 1
Evaluation of Proposed Change

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ATTACHMENT 1

Evaluation of Proposed Change

1.0 SUMMARY DESCRIPTION

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 revised Technical Specifications (TS) Section 4.3.1, "Criticality," to address a non-conservative TS. Specifically, the proposed change addressed 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® inserts in Unit 2 spent fuel storage rack cells as a replacement for the neutron absorbing properties of the existing BORAFLEX™ panels.

The NRC approved EGC's license amendment request in Reference 2. However, in Reference 2, the NRC noted that concerns regarding the long-term crediting of BORAFLEX™ in the LSCS spent fuel pools (SFPs) have yet to be resolved. As such, Reference 2 included license condition 2.C.(30) that established a three-tiered SFP BORAFLEX™ credit configuration that is valid until October 28, 2011. In Reference 3, EGC notified the NRC that the Unit 2 SFP had been reconfigured to comply with license condition 2.C.(30). Reference 2 also included license condition 2.C.(31) that established a more restricted-tiered configuration for crediting BORAFLEX™ until completion of the NETCO-SNAP-IN® insert campaign. Compliance with license condition 2.C.(31) is required after October 28, 2011, until completion of the NETCO-SNAP-IN® insert campaign.

In Reference 4, the NRC requested additional information that is needed to support the ongoing review of the LSCS Unit 2 SFP storage racks. The NRC clarified the request for additional information in a meeting between EGC and the NRC on August 25, 2011. During the meeting, EGC explained that a new criticality analysis would be necessary in order to fully respond to the NRC's request for additional information. EGC also discussed the timeframe for providing responses based on the fact that several of the requests require a new criticality analysis to be performed.

Based on the lengthy timeframe needed to respond, EGC proposed an alternative approach of addressing the NRC's concerns with crediting BORAFLEX™ for the interim configuration of the SFP. The proposal was documented in Reference 5 and discussed with the NRC during a meeting on September 26, 2011. EGC's proposal involves accelerating the insert campaign and implementing controls to ensure that no fuel is stored in spent fuel storage rack cells without NETCO-SNAP-IN® inserts. Under EGC's proposal, the insert campaign will be accelerated such that no fuel would be stored in spent fuel storage rack cells without NETCO-SNAP-IN® inserts in essentially the same amount of time that would be necessary to develop and submit a new criticality analysis necessary to fully respond to the NRC's request for additional information as documented in Reference 4. Specifically, EGC's proposal is to accelerate the insert campaign such that complete loading of all accessible storage rack cells in the LSCS Unit 2 SFP with NETCO-SNAP-IN® inserts will be complete no later than December 31, 2012. In addition, license condition 2.C.(31) is revised to apply until March 31, 2012, and a new license condition 2.C.(34) is being proposed to prohibit fuel storage after March 31, 2012, in spent fuel pool storage rack cells that have not been upgraded with the NETCO-SNAP-IN® inserts.

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After completing license condition 2.C.(32), EGC will submit a license amendment request to revise Facility Operating License No. NPF-18 for LSCS Unit 2 to remove the Operating License conditions that address the interim configurations of the SFP during the NETCO-SNAP-IN® inserts loading campaign.

2.0 DETAILED DESCRIPTION

The LSCS license conditions that are being changed are 2.C.(31) and 2.C.(32). In addition to these changes, a new license condition 2.C.(34) is being proposed. The proposed changes were discussed in the public meeting held on September 26, 2011.

The proposed change to 2.C.(31) adds a final date to the applicability of the license condition. The revised wording of the proposed change reads as follows:

After October 28, 2011, and until March 31, 2012, for the storage cells in the rack modules without NETCO-SNAP-IN® inserts in the LSCS Unit 2 SFP, the following categories will apply: Unrestricted, Restricted, and Unusable.

- (a) Unrestricted will be cells whose minimum panel B¹⁰ areal density is greater than or equal to 0.0200 g/cm², Unrestricted cells may contain fuel assemblies up to the maximum reactivity identified in TS 4.3.1.1.d.
- (b) Restricted will be cells whose minimum panel B¹⁰ areal density is between 0.0200 g/cm² and 0.0167 g/cm². Restricted cells will only contain LSCS Units 1 and 2 Cycle 1 GE and GE14 fuel assemblies.
- (c) Unusable will be cells whose minimum panel B¹⁰ areal density is less than or equal to 0.0167 g/cm². Unusable cells will be administratively controlled to remain empty of any fuel assembly.

The proposed change to 2.C.(32) changes the final completion date for the loading of the NETCO-SNAP-IN® inserts. The revised wording of the proposed change reads as follows:

To ensure the ongoing Boraflex degradation will not exceed the spent fuel pool criticality limits, Exelon shall complete loading all accessible storage rack cells in the LSCS Unit 2 spent fuel pool with NETCO-SNAP-IN® inserts no later than December 31, 2012.

The new license condition 2.C.(34) reads as follows:

After March 31, 2012, no fuel shall be stored in spent fuel storage rack cells without NETCO-SNAP-IN® inserts in the LSCS Unit 2 SFP.

3.0 TECHNICAL EVALUATION

In Reference 2, the NRC issued a license amendment to allow the use of NETCO-SNAP-IN® inserts in Unit 2 spent fuel storage rack cells as a replacement for the neutron absorbing properties of the existing BORAFLEX™ panels. However, in the license amendment, the NRC noted that concerns with respect to the long-term crediting of BORAFLEX™ have yet to be

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resolved. The NRC requested additional information in Reference 4 to support resolution of those concerns.

Upon receipt of the NRC's request for additional information, EGC initiated actions to evaluate options that could be taken to address the NRC's concerns. The primary options considered were to: (1) perform detailed analyses to develop responses to the NRC's request, and (2) determine if the concerns could be addressed through an alternative approach. Regardless of the option selected, EGC recognized that the impact of the NRC's concerns needed to be evaluated expeditiously to ensure adequate margin exists in the current analyses that support crediting BORAFLEX™ in the Unit 2 SFP. Therefore, EGC entered the concerns into the Corrective Action Program so that they could be evaluated and dispositioned. Based on evaluations performed to date, and in light of the license conditions currently in place to govern the configuration of the SFP until completion of the insert campaign, the effective neutron multiplication factor, K_{eff} , of the SFP remains less than or equal to 0.95 when fully flooded with unborated water.

The option to perform detailed analyses to develop responses to the NRC's request requires a new criticality analysis to be prepared. As such, discussions with vendors that perform criticality analyses were initiated to determine the scope of analyses necessary to address the NRC's concerns and the timeframe needed to prepare a new criticality analysis and submit it to the NRC. Based on these discussions, it was determined that the timeframe needed for this option would be approximately six months.

The second option EGC considered was to determine if the NRC's concerns could be addressed through an alternative approach. The alternative approach that EGC considered was to maximize use of resources and capitalize on efficiencies gained to date from installing NETCO-SNAP-IN® inserts, such that the timeline for completing the insert campaign could be accelerated. Based on EGC's experience to date in installing NETCO-SNAP-IN® inserts, it was determined that the NETCO-SNAP-IN® insert campaign could be completed by December 31, 2012 (i.e., well in advance of the December 31, 2014, date currently required by license condition 2.C.(32)). EGC also evaluated whether the Unit 2 SFP could be reconfigured at some point prior to December 31, 2012, such that no fuel is stored in storage rack cells that do not contain NETCO-SNAP-IN® inserts. EGC determined that the Unit 2 SFP could be reconfigured by March 31, 2012, such that no fuel is stored in storage rack cells that do not contain NETCO-SNAP-IN® inserts. Since the criticality analysis associated with the NETCO-SNAP-IN® inserts does not credit the neutron absorbing capabilities of the existing, albeit diminished, BORAFLEX™ panels, reconfiguration of the SFP to ensure no fuel is stored in storage rack cells that do not contain NETCO-SNAP-IN® inserts eliminates the long-term concerns with crediting BORAFLEX™.

The timeframe needed to install NETCO-SNAP-IN® inserts and reconfigure the Unit 2 SFP as described above is essentially the same amount of time that would be necessary to develop and submit a new criticality analysis necessary to fully respond to the NRC's request for additional information (i.e., Reference 4). EGC submitted details regarding this alternative approach to the NRC in Reference 5, and discussed the proposal with the NRC during a meeting on September 26, 2011. Following that meeting, EGC determined that the best option for addressing the concerns with BORAFLEX™ is to accelerate the timeline for installation of the NETCO-SNAP-

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IN® inserts and limiting the time period under which BORAFLEX™ is credited as the neutron absorbing material in the Unit 2 SFP.

The proposed change requires EGC to complete the loading of the NETCO-SNAP-IN® inserts no later than December 31, 2012. In addition, the proposed change modifies license condition 2.C.(31) to clarify that it only applies from October 28, 2011, and until March 31, 2012, after which the proposed new license condition 2.C.(34) would apply.

The proposed change does not impact the criticality analysis that supports use of the rack inserts, which was approved by the NRC in Reference 2. Based upon the nature of the proposed changes listed above, there is no adverse impact on nuclear safety or safe plant operations.

4.0 REGULATORY EVALUATION

4.1 Applicable Regulatory Requirements/Criteria

General Design Criterion (GDC) 61, "Fuel storage and handling and radioactivity control," specifies, in part, that fuel storage systems shall be designed with residual heat removal capability having reliability and testability that reflects the importance of safety of decay heat removal, and with the capability to prevent significant reduction in fuel storage coolant inventory under accident conditions. The proposed changes to the LSCS Unit 2 Operating License are reflective of an accelerated timeline for the installation of the NETCO-SNAP-IN® inserts. Based upon the nature of the proposed changes, there are no impacts on the conclusions that are contained within the LSCS Updated Final Safety Analysis Report Section 3.1.6.2 since no physical modifications to the fuel storage systems are being proposed.

GDC 62, "Prevention of criticality in fuel storage and handling," states that criticality in the fuel storage and handling system shall be prevented by physical systems or processes, preferably by use of geometrically safe configurations. In the Standard Review Plan Section 9.1.1, the NRC has established a 5% subcriticality margin (i.e., K_{eff} less than or equal to 0.95) for nuclear power plant operators to comply with GDC 62. The proposed changes to the LSCS Unit 2 Operating License are reflective of an accelerated timeline for the installation of the NETCO-SNAP-IN® inserts. Based upon the nature of the proposed changes, there is no impact on the inputs or assumptions for the existing analysis that demonstrate that K_{eff} will remain less than or equal to 0.95.

10 CFR 50.68, "Criticality accident requirements," paragraph (b)(4) requires that, if no credit for soluble boron is taken, the K_{eff} of the spent fuel storage racks loaded with fuel of the maximum fuel assembly reactivity must not exceed 0.95, at a 95 percent probability, 95 percent confidence level, if flooded with unborated water. The proposed changes to the LSCS Unit 2 Operating License are reflective of an accelerated timeline for the installation of the NETCO-SNAP-IN® inserts and will not impact the criticality analysis that demonstrates that this requirement is met.

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4.2 No Significant Hazards Consideration

In accordance with 10 CFR 50.90, "Application for amendment of license, construction permit, or early site permit," Exelon Generation Company, LLC (EGC) requests an amendment to Facility Operating License No. NPF-18 for LaSalle County Station (LSCS), Unit 2. The proposed change revises the LSCS Unit 2 operating license to accelerate the timeline for installation of the NETCO-SNAP-IN® inserts in the LSCS Unit 2 spent fuel pool (SFP). In addition, the proposed change adds a new license condition that limits the time period under which BORAFLEX™ is credited as the neutron absorbing material in the Unit 2 SFP.

According to 10 CFR 50.92, "Issuance of amendment," paragraph (c), a proposed amendment to an operating license involves no significant hazards consideration if operation of the facility in accordance with the proposed amendment would not:

- (1) Involve a significant increase in the probability or consequences of any accident previously evaluated; or
- (2) Create the possibility of a new or different kind of accident from any accident previously evaluated; or
- (3) Involve a significant reduction in a margin of safety.

EGC has evaluated the proposed change, using the criteria in 10 CFR 50.92, and has determined that the proposed change does not involve a significant hazards consideration. The following information is provided to support a finding of no significant hazards consideration.

1. Does the proposed change involve a significant increase in the probability or consequences of an accident previously evaluated?

Response: No

The proposed change revises the LSCS Unit 2 Operating License to accelerate the timeline for installation of the NETCO-SNAP-IN® inserts in the LSCS Unit 2 SFP, and limit the time period under which BORAFLEX™ is credited as the neutron absorbing material in the Unit 2 SFP. There are no changes to the SFP criticality analysis associated with the proposed change. The SFP criticality analysis was previously approved by the NRC and continues to demonstrate that the effective neutron multiplication factor, K_{eff} , is less than or equal to 0.95 if the SFP is fully flooded with unborated water. No physical changes to the plant are proposed, no new plant equipment is being installed, and there are no changes to the manner in which the plant is operated. Rather, the proposed change is administrative because it involves accelerating the timeline for installing the NETCO-SNAP-IN® inserts and limiting the time period under which BORAFLEX™ is credited as the neutron absorbing material in the Unit 2 SFP.

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The probability that a fuel assembly would be dropped is unchanged by the proposed change. These events involve failures of administrative controls, human performance, and equipment failures that are unaffected by the proposed change. The proposed change does not result in a significant increase in the consequence of an accident previously analyzed. The criticality analysis that demonstrates adequate margin to criticality for spent fuel storage rack cells with rack inserts in the LSCS Unit 2 SFP, and adequate criticality margin for assemblies accidentally dropped onto the spent fuel storage racks, is not being changed. The consequences of dropping a fuel assembly onto any other fuel assembly or other structure are unaffected by the proposed change.

Therefore, the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Does the proposed change create the possibility of a new or different kind of accident from any accident previously evaluated?

Response: No

The proposed change revises the LSCS Unit 2 Operating License to accelerate the timeline for installation of the NETCO-SNAP-IN® inserts in the LSCS Unit 2 SFP, and limit the time period under which BORAFLEX™ is credited as the neutron absorbing material in the Unit 2 SFP. There are no changes to the SFP criticality analysis associated with the proposed change. No physical changes to the plant are proposed, and there are no changes to the manner in which the plant is operated. Rather, the proposed change is administrative because it involves accelerating the timeline for installing the NETCO-SNAP-IN® inserts and limiting the time period under which BORAFLEX™ is credited as the neutron absorbing material in the Unit 2 SFP.

Therefore, the proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. Does the proposed change involve a significant reduction in a margin of safety?

Response: No

The proposed change revises the LSCS Unit 2 Operating License to accelerate the timeline for installation of the NETCO-SNAP-IN® inserts in the LSCS Unit 2 SFP, and limit the time period under which BORAFLEX™ is credited as the neutron absorbing material in the Unit 2 SFP. Plant safety margins are established through limiting conditions for operation, limiting safety system settings, and safety limits specified in Technical Specifications. The proposed change does not alter these established safety margins. For SFP criticality, the required safety margin is 5% including a conservative margin to account for engineering and manufacturing uncertainties. The proposed change does not alter the criticality analysis for the SFP and does not affect the SFP criticality safety margin.

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Therefore, the proposed change does not involve a significant reduction in a margin of safety.

Based on the above evaluation, EGC concludes that the proposed amendment presents no significant hazards consideration under the standards set forth in 10 CFR 50.92, paragraph (c), and accordingly, a finding of no significant hazards consideration is justified.

4.3 Conclusions

In conclusion, based on the considerations discussed above, (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or the health and safety of the public.

5.0 ENVIRONMENTAL CONSIDERATION

EGC has determined that the proposed amendment would change a requirement with respect to installation or use of a facility component located within the restricted area, as defined in 10 CFR 20, "Standards for Protection Against Radiation." However, the proposed amendment does not involve: (i) a significant hazards consideration, (ii) a significant change in the types or significant increase in the amounts of any effluent that may be released offsite, or (iii) a significant increase in individual or cumulative occupational radiation exposure. Accordingly, the proposed amendment meets the eligibility criterion for categorical exclusion set forth in 10 CFR 51.22, "Criterion for categorical exclusion; identification of licensing and regulatory actions eligible for categorical exclusion or otherwise not requiring environmental review," paragraph (c)(9). Therefore, pursuant to 10 CFR 51.22, paragraph (b), no environmental impact statement or environmental assessment needs to be prepared in connection with the proposed amendment.

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6.0 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 Generation Company, LLC), " LaSalle County Station, Units 1 and 2, Issuance of Amendments Concerning Spent Fuel Neutron Absorbers (TAC Nos. ME2376 and ME2377) (RS-09-133)," dated January 28, 2011
3. Letter from P. R. Simpson (Exelon Generation Company, LLC) to U.S. NRC, "Completion of Licensing Condition 2.C.(30) Associated with Unit 2 Spent Fuel Pool Storage Racks," dated July 13, 2011
4. Letter from A. T. Billoch Colón (U.S. NRC) to M. J. Pacilio (Exelon Nuclear), "LaSalle County Station, Units 1 and 2 – Request for Additional Information Related to Spent Fuel Storage Racks (TAC. Nos. ME6834 and ME6835)," dated August 23, 2011
5. Letter from P. R. Simpson (Exelon Generation Company, LLC) to U.S. NRC, " Response to Request for Additional Information Regarding Unit 2 Spent Fuel Pool Storage Racks," dated September 21, 2011

ATTACHMENT 2
Markup of Proposed Operating License Pages

LaSalle County Station, Unit 2

Facility Operating License No. NPF-18

REVISED OPERATING LICENSE PAGES

Page 8

Page 9

- (c) The first performance of the periodic measurement of CRE pressure, Specification 5.5.15.d, shall be within 24 months, plus the 6 months allowed by SR 3.0.2, as measured from the date of the most recent successful pressure measurement test, or within 6 months if not performed previously.

Am. 186
01/28/11

- (30) Beginning 120 days after the LSCS Unit 2 refueling outage 13 (L2R13) and until October 28, 2011, the storage cells in the rack modules without NETCO-SNAP-IN[®] inserts will be placed into one of three categories: Unrestricted, Restricted and Unusable.

- (a) Unrestricted will be cells whose minimum panel B¹⁰ areal density is greater than or equal to 0.0167 g/cm², Unrestricted cells may contain fuel assemblies up to the maximum reactivity identified in TS 4.3.1.1.d.
- (b) Restricted will be cells whose minimum panel B¹⁰ areal density is between 0.0167 g/cm² and 0.0115 g/cm². Restricted cells will only contain LSCS Units 1 and 2 Cycle 1 General Electric (GE) and GE14 fuel assemblies.
- (c) Unusable will be cells whose minimum panel B¹⁰ areal density is less than or equal to 0.0115 g/cm². Unusable cells will be administratively controlled to remain empty of any fuel assembly.

and until March 31, 2012,

Am. 186
~~01/28/11~~

- (31) After October 28, 2011, for the storage cells in the rack modules without NETCO-SNAP-IN[®] inserts in the LSCS Unit 2 SFP, the following categories will apply: Unrestricted, Restricted, and Unusable.

- (a) Unrestricted will be cells whose minimum panel B¹⁰ areal density is greater than or equal to 0.0200 g/cm², Unrestricted cells may contain fuel assemblies up to the maximum reactivity identified in TS 4.3.1.1.d.
- (b) Restricted will be cells whose minimum panel B¹⁰ areal density is between 0.0200 g/cm² and 0.0167 g/cm². Restricted cells will only contain LSCS Units 1 and 2 Cycle 1 GE and GE14 fuel assemblies.
- (c) Unusable will be cells whose minimum panel B¹⁰ areal density is less than or equal to 0.0167 g/cm². Unusable cells will be administratively controlled to remain empty of any fuel assembly.

Am. 186
~~01/28/11~~

- (32) To ensure the ongoing Boraflex degradation will not exceed the spent fuel pool criticality limits, Exelon shall complete loading all accessible storage rack cells in the LSCS Unit 2 spent fuel pool with NETCO-SNAP-IN[®] inserts no later than December 31, 2014.

2012

Am. 186
01/28/11

(33) The methodology in AREVA NP Inc. Report No. ANP-2843(P), "LaSalle Unit 2 Nuclear Power Station Spent Fuel Storage Pool Criticality Safety Analysis with Neutron Absorbing Inserts and Without Boraflex," Revision 1, dated August 2009, as corrected by Attachment 3 to a letter dated June 10, 2010 from P. Simpson to the NRC, shall be used to perform required criticality calculations associated with the storage cells containing NETCO-SNAP-IN® inserts.

INSERT 

Am. 87
03/16/95

D. The facility requires exemptions from certain requirements of 10 CFR Part 50, 10 CFR Part 70, and 10 CFR Part 73. These include:

(a) Exemptions from certain requirements of Appendices G, H and J to 10 CFR Part 50, and to 10 CFR Part 73 are described in the Safety Evaluation Report and Supplement Numbers 1, 2, 3, and 5 to the Safety Evaluation Report.

Am. 181
08/28/09

(b) DELETED

(c) An exemption from the requirement of paragraph III.D of Appendix J to conduct the third Type A test of each ten-year service period when the plant is shutdown for the 10-year plant inservice inspections.

Am. 181
08/28/09

(d) DELETED

Am. 97
04/05/96

(e) An exemption was granted to remove the Main Steam Isolation Valves (MSIVs) from the acceptance criteria for the combined local leak rate test (Type B and C), as defined in the regulations of 10 CFR Part 50, Appendix J, Option B, Paragraph III.B. Exemption (e) is described in the safety evaluation accompanying Amendment No. 97 to this License.

These exemptions are authorized by law and will not endanger life or property or the common defense and security and are otherwise in the public interest. Therefore, these exemptions are hereby granted. The facility will operate, to the extent authorized herein, in conformity with the application, as amended, and the rules and regulations of the Commission (except as hereinafter exempted therefrom), and the provisions of the Act.

E. Before engaging in additional construction or operational activities which may result in a significant adverse environmental impact that was not evaluated or that is significantly greater than that evaluated in the Final Environmental Statement and its Addendum, the licensee shall provide a written notification to the Director of the Office of Nuclear Reactor Regulation and receive written approval from that office before proceeding with such activities.

INSERT

- (34) After March 31, 2012, no fuel shall be stored in spent fuel storage rack cells without NETCO-SNAP-IN® inserts in the LSCS Unit 2 SFP.

ATTACHMENT 3
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.

COMMITMENT	COMMITTED DATE OR "OUTAGE"	COMMITMENT TYPE	
		ONE-TIME ACTION (YES/NO)	PROGRAM- MATIC (YES/NO)
After completing license condition 2.C.(32), EGC will submit a license amendment request to revise Facility Operating License No. NPF-18 for LaSalle County Station (LSCS), Unit 2 to remove the Operating License conditions that address the interim configurations of the spent fuel pool during the NETCO-SNAP-IN® inserts loading campaign.	6/29/2013	Yes	No