



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**
WASHINGTON, D.C. 20555-0001

July 12, 2012

LICENSEE: Exelon Generation Company, LLC
FACILITY: LaSalle County Station, Units 1 and 2
SUBJECT: SUMMARY OF JUNE 11, 2012, PRE-SUBMITTAL PUBLIC MEETING WITH EXELON GENERATION COMPANY, LLC REGARDING LASALLE COUNTY STATION EXTENDED POWER UPRATE REPLACEMENT STEAM DRYER FOR UNITS 1 AND 2 (TAC NOS. ME7495 AND ME7496)

On June 11, 2012, a Category 1 public meeting was held between the U.S. Nuclear Regulatory Commission (NRC) and representatives of Exelon Generation Company, LLC (EGC, the licensee) at the NRC Headquarters, One White Flint North, 11555 Rockville Pike, Rockville, Maryland. The purpose of the meeting was to discuss the replacement steam dryers (RSDs) related to a proposed license amendment request (LAR) for an Extended Power Uprate (EPU) at the LaSalle County Station, Units 1 and 2 (LaSalle). A list of attendees is provided as Enclosure 1.

During the meeting, EGC informed the NRC staff of their plans to submit an LAR, requesting a 12.5 percent increase in licensed thermal power for LaSalle in December 2012 following the planned submittal of the Peach Bottom Atomic Power Station, Units 2 and 3, EPU LAR in September 2012. The meeting discussion focused on the designation of LaSalle, Units 1 and 2, and Peach Bottom, Unit 3, RSDs as non-prototype Category 1, using the Peach Bottom, Unit 2, RSD as a prototype and the approach to be utilized for processing main steam line (MSL) strain gauge data. The licensee discussed the slides and a pre-application checklist contained in the public meeting notice (Agencywide Documents Access and Management System (ADAMS) Accession Nos. ML12159A266 and ML12137A179, respectively).

The meeting piloted the use of the Nuclear Energy Institute (NEI)-developed pre-application checklist. The purpose of the pre-application meeting using the NEI checklist is for NRC staff and licensees to reach a common understanding of the regulatory criteria and standards to be applied in the review of significant licensing actions with a goal of enhancing the effectiveness and efficiency of the review process. A series of LaSalle EPU pre-application meetings have been held and future meetings are planned to discuss additional technical topics. For each subsequent pre-application meeting, the NEI checklist is intended to be used to support discussions. Additional information about the NEI checklist pilot process may be found in a public meeting summary from November 2, 2011 (ADAMS Accession No. ML113210594).

No regulatory decisions were made during this meeting, although the following items were generally agreed to between the NRC and EGC. EGC informed the NRC staff that it plans to submit its EPU LAR for LaSalle in the 4th quarter of 2012 with implementation for LaSalle, Unit 2, in the 1st Quarter of 2017 and Unit 1 in the 1st Quarter of 2018.

Summary of Discussions:

1. EGC and the NRC staff agreed in principle that Regulatory Guide (RG) 1.20, rev. 3 "Comprehensive Vibration Assessment Program for Reactor Internals During Preoperational and Initial Startup Testing," is an acceptable approach for use with RSDs in conjunction with EPU LARs. EGC intends to designate Peach Bottom, Unit 2,

RSD as the prototype and LaSalle, Units 1 and 2, and Peach Bottom, Unit 3, RSDs as non-prototype Category I.

- a. The NRC staff stressed that EGC will have to validate the Peach Bottom Unit 2 RSD prototype, consistent with RG 1.20, through the use of analysis, measurement, and a full inspection plan in order to support the non-prototype Category 1 designation for the LaSalle, Units 1 and 2, and Peach Bottom, Unit 3, RSDs. The staff acknowledges that the licensee plans to install Peach Bottom Unit 3 RSD prior to full inspections on Peach Bottom Unit 2. The staff also noted that with the revised plan to implement the first EPU at LaSalle in 2017, this would allow for sufficient time to validate the methodology based on data from the Peach Bottom, Unit 2, RSD prototype.
 - b. Consistent with RG 1.20, non-prototype Category I RSDs will have to be supported by analysis and either extensive measurement or full inspection. Full inspection, as stipulated in Section 3.1.2 of RG 1.20, should follow the inspection program guidelines delineated in RG 1.20 for prototype internals. EGC proposed to perform unit specific analysis, MSL measurement and RSD inspections per manufacture recommendations (which are under development) and industry operating experience.
 - c. The staff recommends that any deviations from RG 1.20 should be identified in the licensee's submittal with appropriate justification.
 - d. EGC inquired if parameters presented adequately covered the nominal differences in arrangement, size, design, and operating conditions between the LaSalle and the Peach Bottom RSDs and cover the effects of vibratory response. The NRC staff did not recommend any additional parameters of interest. The NRC staff expects that the unit-specific analyses to be performed by EGC should demonstrate and justify how the RSD operating conditions and plant geometric parameters are substantially similar for which nominal differences will have no significant effect on the vibratory response and excitation of the RSDs.
2. EGC plans to utilize a plant-specific inspection program for Peach Bottom, Unit 2 (prototype unit), using Westinghouse vendor recommendations. EGC indicated that its inspection plans for the Peach Bottom, Unit 3, and LaSalle, Units 1 and 2, RSDs will be conducted in accordance with the current reactor vessel internals inspection program and schedule with a focus on accessible welds at critical locations on the RSDs.
- a. The NRC staff questioned the basis for not revising the inspection frequencies and scope for the non-prototype RSD. RG 1.20, Section 3.1.2, states that:

"If an inspection program is implemented in lieu of a vibration measurement program, the applicant/licensee should follow the inspection program guidelines delineated in this regulatory guide for prototype reactor internals."

The staff advised EGC that the proposed inspection program plan may not be comprehensive when compared to the guidance in RG 1.20.

- b. The NRC staff noted that recent EPU approvals have followed BWRVIP-139, "BWR [boiling-water reactor] Vessel and Internals Project, Steam Dryer Inspection and Flaw Evaluation Guidelines," recommendations which include changing inspection frequency and the use of enhanced inspection methods. Recent BWR RDSs approvals have relied on the inspection frequency and scope provided by BWRVIP-139.
 - c. The staff acknowledged that EGC will be proposing a different inspection plan which will consider BWRVIP-139 and include (as appropriate) elements of the inspection plan. The staff noted that there is limited domestic operational experience (i.e. Monticello) with the Nordic steam dryer design. The staff will review the RSD inspection plan recommendations on its technical merit when submitted.
3. EGC and the NRC staff agreed in principle that Nordic operation condition experience audit open items would be addressed prior EPU application submittal (i.e., request for additional information (RAIs) related to RSD from the Monticello EPU review).
4. EGC and the NRC staff agreed that LaSalle and Peach Bottom would address applicable RAIs from other steam dryer EPU requests (e.g., Grand Gulf, Hope Creek, Nine Mile Point, Monticello, Quad Cities, and Susquehanna).
5. The NRC staff noted that filtering of the MSL signals at recirculation pump vane passing frequencies is questionable and recommended that EGC review the recent Grand Gulf EPU RAIs related to this subject.
6. The NRC inquired if EGC plans to perform a hammer test. The staff acknowledged that the hammer test is not a requirement but served as an independent verification of analytical methods. EGC is not planning to perform a hammer test analysis and they intend to provide a basis for this decision. Furthermore, the RSDs would not be constructed prior to submittal of the EPU application for NRC review.
7. EGC is planning to submit the instrumentation plan for Peach Bottom, Unit 2 (prototype unit), as requested by the NRC staff and consistent with RG 1.20. Based on experience from Monticello, EGC stated that the steam dryer sensors have had better performance than industry operating experience.

The meeting notice and agenda are available under ADAMS Accession No. ML12137A179. The public was invited to observe the meeting. Several members of the public were in attendance on the bridge line. Public Meeting Feedback forms were not received.

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Please direct any inquiries to me at 301-415-1115, or Nicholas.DiFrancesco@nrc.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Nicholas DiFrancesco", written in a cursive style.

Nicholas DiFrancesco, Project Manager
Plant Licensing Branch III-2
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-373, 50-374, 50-277, 50-278

Enclosure:
List of Attendees

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LIST OF ATTENDEES
JUNE 11, 2012, PUBLIC MEETING
WITH EXELON GENERATION COMPANY, LLC
REGARDING THE PROPOSED EXTENDED POWER UPRATE
LICENSE AMENDMENT REQUEST FOR
LASALLE COUNTY STATION, UNITS 1 AND 2

NRC

J. Zimmerman
N. DiFrancesco
H. Rodríguez
W. Jessup
K. Manoly
C. Basavaraju
R. Ennis

EGC

K. Ainger
J. Rommel
D. Forsyth (Westinghouse)
R. Dennis (Westinghouse)
T. Poindexter (Morgan Lewis)
J. Neary (Morgan Lewis)
W. McDonald
B. Maurer (Westinghouse)
R. Janowalk
K. Borton

State of Pennsylvania

B. Fuller* (Pennsylvania Department of
Environmental Protection)

Public

J. Hiremagalur* (Structural Integrity
Associates)

* via teleconference

Please direct any inquiries to me at 301-415-1115, or Nicholas.DiFrancesco@nrc.gov.

Sincerely,

/ RA /

Nicholas DiFrancesco, Project Manager
Plant Licensing Branch III-2
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-373, 50-374, 50-277, 50-278

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