



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

September 30, 2013

Mr. Michael Pacilio
Senior Vice President
Exelon Generation Company, LLC
President and Chief Nuclear Office (CNO)
Exelon Nuclear
4300 Winfield Road
Warrenville, Illinois 60555

SUBJECT: LASALLE COUNTY STATION, UNITS 1 AND 2, REVISION 19, OF THE
UPDATED FINAL SAFETY ANALYSIS REPORT (MF2592 AND MF2593)

Dear Mr. Pacilio:

By letter dated April 12, 2012, Exelon Generation Company (EGC), LLC, submitted Revision 19 of the updated final safety analysis report (UFSAR) for LaSalle County Station (LSCS), Units 1 and 2 to the U.S. Nuclear Regulatory Commission (NRC). In accordance with Title 10 of the *Code of Federal Regulations* (10 CFR) 50.71, "Maintenance of records, making of reports," licensees are required to submit accurate and updated information. Specifically, 10 CFR 50.71(e)(1) and (e)(2) states:

- (e)(1) The licensee shall submit revisions containing updated information to the Commission, as specified in § 50.4, on a replacement-page basis that is accompanied by a list which identifies the current pages of the FSAR following page replacement.
- (e)(2) The submittal shall include (i) a certification by a duly authorized officer of the licensee that either the information accurately presents changes made since the previous submittal, necessary to reflect information and analyses submitted to the Commission or prepared pursuant to Commission requirement, or that no such changes were made; and (ii) an identification of changes made under the provisions of § 50.59 ["Changes, tests and experiments,"] but not previously submitted to the Commission.

The NRC staff has found that LSCS UFSAR, Revision 19, did not update information as required by 10 CFR 50.71(e)(1) and (e)(2). The NRC staff, for its review, utilized RG 1.81, "Content of the Updated Final Safety Analysis Report in Accordance with 10 CFR 50.71(e)," which endorsed NEI 98-03, "Guidelines for Updating Final Safety Analysis Reports," Revision 1, identified a number of concerns associated with your facility meeting UFSAR update requirements and the level of detail required pursuant to 10 CFR 50.34(b) which states in part:

- (b) *Final safety analysis report.* Each application for an operating license shall include a final safety analysis report. The final safety analysis report shall include information that describes the facility, presents the design bases and the limits on its operation, and presents a safety analysis of the structures, systems, and components and of the facility as a whole [...]

The NRC staff found that UFSAR, Chapter 15, does not contain up-to-date information relating to the current safety analysis or licensing basis. Chapter 15 contains historic summary descriptions of the methods and analyses performed. For example, the reload specific safety analysis is updated in a separate document from the UFSAR and was not provided as part of the update. Changes made in the LSCS reload licensing reports were not reflected in the updated UFSAR. UFSAR, Sections 15.0 and 15.A, identifies entire sections of Chapter 15 information as historic information. The NRC staff determined this information is inconsistent with NRC-endorsed guidance and does not satisfy the requirements of 10 CFR 50.71(e) and 10 CFR 50.34(b).

The NRC staff found that the UFSAR does not identify which LSCS references are incorporated. Nuclear Energy Institute (NEI) 98-03, states that references incorporated into the UFSAR shall be provided to the NRC and made available to other interested parties. References incorporated into the USFAR are subject to 10 CFR 50.71(e) requirements, and these documents must be provided to the NRC as part of the facility's docket, unless there are explicit NRC requirement to maintain the information on site.

The NRC staff on August 28, 2013, discussed the following issues identified during its review of LSCS UFSAR, Revision 19, with EGC staff:

1. UFSAR, Section 1.6, states that some materials incorporated by reference into the UFSAR are contained in Table 1.6-1. However, Table 1.6-1 does not exist. The UFSAR does not identify which references are incorporated.
2. UFSAR, Section 15.0, states that UFSAR, Sections 15.1 through 15.10, are historic information. This is inconsistent with 10 CFR 50.71(e) to maintain the facility's current licensing and design basis.
3. UFSAR, Section 15 A, Cycle Specific Reload Analysis states, "*This section is retained for its historical information only. The most current safety analyses information can be found in cycle specific transient and reload documents.*" The UFSAR does not meet the intent of 10 CFR 50.71(e), to serve as an updated reference document to be used in recurring safety analyses performed by the licensee, the Commission, and other interested parties. The UFSAR should capture the current safety analysis and methods of evaluation for LSCS. Relevant information contained in cycle specific transient and reload documents should be either appropriately reflected in the UFSAR text or incorporated by reference into the USFAR. Obsolete information such as methods of evaluation not utilized in the current safety analysis should be removed from the UFSAR.
4. NEI 98-03, Revision 1, Section A3, recommends relocation of Historic Information to the UFSAR Chapter Appendices or to clearly document what is historic within the text.
5. For documents not already publically available, the EGC should submit, on the docket, new references and revisions that are incorporated by reference into the USFAR per NEI 98-03, Section A4.3.

M. Pacilio

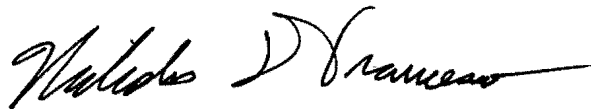
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6. UFSAR references should not be marked as "latest revision" as this may impact 10 CFR 50.59 control and 10 CFR 50.71(e) review of changes. Formal review of revision changes ensures that updated methodologies are being used consistent with the limitations or conditions of the approved revision.

The NRC staff plans to review disposition of these issues in the next UFSAR update planned for April 2014. This information has been provided to NRC's site inspectors at LSCS for review under the NRC's Reactor Oversight Process.

If you have any questions regarding this issue, please contact me at 301-415-1115.

Sincerely,

A handwritten signature in black ink, appearing to read "Nicholas DiFrancesco", with a long horizontal flourish extending to the right.

Nicholas DiFrancesco, Project Manager
Plant Licensing Branch 3-2
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-373 and 50-374

cc: Listserv

M. Pacilio

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/ RA /

Nicholas DiFrancesco, Project Manager
Plant Licensing Branch 3-2
Division of Operating Reactor Licensing
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Docket Nos. 50-373 and 50-374

cc: Listserv

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