



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

August 27, 2015

Mr. Michael P. Gallagher
Vice President, License Renewal Projects
Exelon Generation Company, LLC
200 Exelon Way
Kennett Square, PA 19348

SUBJECT: REQUESTS FOR ADDITIONAL INFORMATION FOR THE REVIEW OF THE
LASALLE COUNTY STATION, UNITS 1 AND 2 LICENSE RENEWAL
APPLICATION – SET 10 (TAC NOS. MF5347 AND MF5346)

Dear Mr. Gallagher:

By letter dated December 9, 2014, Exelon Generation Company, LLC (Exelon) submitted an application pursuant to Title 10 of the *Code of Federal Regulations* Part 54, to renew the operating licenses NPF-11 and NPF-18 for LaSalle County Station (LSCS), Units 1 and 2, respectively. The staff of the U.S. Nuclear Regulatory Commission (NRC or the staff) is reviewing the information contained in the license renewal application and has identified, in the enclosure, areas where additional information is needed to complete the review.

These requests for additional information were discussed with Mr. John Hufnagel, and a mutually agreeable date for the response is within 30 days from the date of this letter. If you have any questions, please contact me at 301-415-3019 or by e-mail at Jeffrey.Mitchell2@nrc.gov.

Sincerely,

/RA/

Jeffrey S. Mitchell, Project Manager
Projects Branch 1
Division of License Renewal
Office of Nuclear Reactor Regulation

Docket Nos. 50-373 and 50-374

Enclosure:
As stated

cc: Listserv

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OFFICE	LA:DLR*	PM:RPB1:DLR	PM:RPB1:DLR	BC:RPB1:DLR	PM:RPB1:DLR
NAME	YEdmonds	JMitchell	RPlasse	YDiaz-Sanabria	JMitchell
DATE	8/ 25 /15	8/ 25 /15	8/ 26 /15	8/ 26 /15	8/ 27 /15

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Letter to Michael Gallagher from Jeffrey S. Mitchell dated August 27, 2015

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**LASALLE COUNTY STATION, UNITS 1 AND 2
LICENSE RENEWAL APPLICATION
REQUESTS FOR ADDITIONAL INFORMATION – SET 10
(TAC NOS. MF5347 AND MF5346)**

Follow-up RAI 2.3.3.12-2a

Background:

In its response to RAI 2.3.3.12-2, dated July 1, 2015, regarding scoping and screening related to the smoke and heat vent housings, the applicant stated the following:

Smoke and heat vent housings are located in the LSCS Turbine Building roof. These smoke and heat vent housings are not relied upon in safety analyses or plant evaluations to perform a function that demonstrates compliance with the Commission's regulations for Fire Protection, specifically considering the regulations applicable to LSCS's current licensing basis: 10 CFR 50.48, Branch Technical Position (BTP) ASB 9.5-1, Appendix R to Part 50 – Fire Protection Program for Nuclear Power Facilities, and the associated Safety Evaluation Report for LSCS Fire Protection. The BTP discusses smoke and heat vents in support of manual fire fighting for some areas, such as cable spreading rooms, diesel fuel oil storage areas, and switchgear rooms. It does not discuss the Turbine Building smoke and heat vents in this regard. The Turbine Building roof smoke and heat vent housings are discussed in the UFSAR and Fire Protection Report. There is no connection between the BTP manual fire fighting support statement and the Turbine Building roof vent housing discussions. The UFSAR and Fire Protection report information is provided for completeness of the area description and does not imply that the vent housings are required or credited for implementation of regulatory requirements. The smoke and heat vent housings are not safety-related nor relied upon to remain functional during design basis events, and the failure of these nonsafety-related components would not prevent the accomplishment of safety-related functions. The smoke and heat vent housings are not relied upon to demonstrate compliance with the Commission's regulations for Environmental Qualification, Anticipated Transient Without Scram, or Station Blackout. Therefore, the smoke and heat vent housings do not perform a license renewal intended function. They are not in scope for license renewal and therefore are not subject to AMR.

Issue:

The applicant stated that the turbine building smoke and heat vents do not have fire protection intended functions required for compliance with Title 10 of the *Code of Federal Regulations* (10 CFR), Part 50.48, "Fire Protection." Additionally, the applicant stated that the turbine building smoke and heat vents are not relied upon in safety analyses or plant evaluations to perform a function that demonstrates compliance with the Commission's regulations for Fire Protection, specifically considering the regulations applicable to LaSalle County Station's (LSCS's) current licensing basis (CLB). The licensee concluded that the smoke and heat vent

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housings are not within the scope of license renewal and not subject to an aging management review (AMR).

The staff finds the applicant's response contrary to the Updated Final Safety Analysis Report (UFSAR) and Fire Protection Report (FPR), Rev. 6, which include the original LSCS Fire Protection program as the CLB. FPR Section H.3.5.3, "Turbine Operating Floor and Heater Bay - Fire Zone 5A3," subsection "Description," states, in part:

Fusible link type heat and smoke vents are provided on the turbine building roof. The criteria for sizing these vents is a vent ratio of one to one hundred for the combined floor area of the main turbine floor and the heater bay. Motorized outside doors are provided for intake air for heat and smoke venting.

FPR Section H.3.5.3, subsection "Safety-Related Equipment," states that "[t]his zone contains safety related HVAC monitoring instrumentation."

Additionally, FPR Section H.3.5.3, subsection "Design-Basis Fire" states:

The design-basis fire would be contained within the turbine building. It is possible for oil, in the unlikely event of a line rupture, to leak down to the zone below; however, that zone is completely protected by automatic sprinklers. The automatic sprinklers are designed to extinguish an oil fire and the automatic smoke and heat vents would prevent heat from building up and causing any flashover.

Fire Zone 5A3 contains safety related HVAC monitoring instrumentation and equipment, and the fire protection system consists of the automatic sprinkler system and automatic smoke and heat vents noted above. According to LSCS's FPR, following an oil fire in Fire Zone 5A3, automatic smoke and heat vents would prevent heat from building up and causing any flashover. Based on the LSCS CLB, turbine building smoke and heat vents were credited to meet the guidance of BTP ASB 9.5-1. The turbine building automatic smoke and heat vent housings should not be excluded from the scope of license renewal on the basis that they are not required to function during a fire, or on not being required for compliance to 10 CFR 50.48, without factoring in the CLB.

For the above reasons, the staff determined that the turbine building smoke and heat vent housings in question must be managed during the period of extended operation to-comply with 10 CFR 50.48 (in accordance with the current licensing basis) as stated in 10 CFR 54.4(a)(3).

Request:

Provide information to demonstrate that the effects of aging will be adequately managed so that the intended function(s) will be maintained consistent with the CLB for the period of extended operation as required by 10 CFR 54.21(a)(3).