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RS-15-258

September 29, 2015

10 CFR 50.90

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

> Dresden Nuclear Power Station, Units 2 and 3 Renewed Facility Operating License Nos. DPR-19 and DPR-25 <u>NRC Docket Nos. 50-237 and 50-249</u>

LaSalle County Station, Units 1 and 2 Facility Operating License Nos. NPF-11 and NPF-18 NRC Docket Nos. 50-373 and 50-374

Quad Cities Nuclear Power Station, Units 1 and 2 Renewed Facility Operating License Nos. DPR-29 and DPR-30 <u>NRC Docket Nos. 50-254 and 50-265</u>

- Subject: Response to Request for Additional Information Regarding License Amendment Request Adding Technical Specification for Inservice Leak and Hydrostatic Testing Operation
- References: 1) Letter from D. M. Gullott (Exelon Generation Company, LLC) to U. S. Nuclear Regulatory Commission, "License Amendment Request for Addition of New LCO 3.10.8 for Reactor Vessel Hydrostatic and Leak Testing Requirements and for Adoption of TSTF-484, Revision 0, 'Use of TS 3.10.1 for Scram Time Testing Activities'," dated December 22, 2014 (ADAMS Accession No. ML14357A085)
  - 2) Letter from B. Purnell (U. S. Nuclear Regulatory Commission) to B. C. Hanson (Exelon Generation Company, LLC), "Dresden Nuclear Power Station, Units 2 and 3; LaSalle County Station, Units 1 and 2; Quad Cities Nuclear Power Station, Units 1 and 2 – Request for Additional Information regarding License Amendment Request to Add Technical Specification for Inservice Leak and Hydrostatic Testing Operation (TAC Nos. MF5471 – MF5476)," dated August 31, 2015 (ADAMS Accession No. ML15232A700)

In Reference 1, Exelon Generation Company, LLC (EGC) submitted a license amendment request (LAR) for Dresden Nuclear Power Station, Units 2 and 3, LaSalle Count Station, Units 1 and 2, and Quad Cities Nuclear Power Station, Units 1 and 2, to add Technical Specification (TS) 3.10.8, "Inservice Leak and Hydrostatic Testing Operation," which would permit inservice leakage and hydrostatic testing at reactor coolant system (RCS) temperatures greater than the average

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reactor coolant temperature for Mode 4 with the reactor shutdown and adopt TSTF-484, Revision 0, "Use of TS 3.10.1 for Scram Time Testing Activities."

In Reference 2, the U. S. Nuclear Regulatory Commission (NRC) requested additional information related to its review of the LAR. The Attachment to this letter provides the requested information.

There are no regulatory commitments contained within in this letter.

Should you have any questions concerning this letter, please contact Ms. Lisa A. Simpson at (630) 657-2815.

Respectfully,

David M. Gullott Manager – Licensing Exelon Generation Company, LLC

Attachment: Response to Request for Additional Information

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

## ATTACHMENT Response to Request for Additional Information

By letter to the U. S. Nuclear Regulatory Commission (NRC) dated December 22, 2014 (ADAMS Accession No. ML14357A085), Exelon Generation Company, LLC (EGC) submitted a license amendment request (LAR) for Dresden Nuclear Power Station, Units 2 and 3, LaSalle Count Station, Units 1 and 2, and Quad Cities Nuclear Power Station, Units 1 and 2, to add Technical Specification (TS) 3.10.8, "Inservice Leak and Hydrostatic Testing Operation," to permit inservice leakage and hydrostatic testing at reactor coolant system (RCS) temperatures greater than the average reactor coolant temperature for Mode 4 with the reactor shutdown and to adopt TSTF-484, Revision 0, "Use of TS 3.10.1 for Scram Time Testing Activities."

In NRC letter dated August 31, 2015 (ADAMS Accession No. ML15232A700), the NRC requested additional information to complete its review of the proposed LAR.

## NRC Request

The inservice leak and hydrostatic testing, as well as control rod scram time testing, are performed at high pressure. The TSs require the high pressure coolant injection (or high pressure core spray) and the automatic depressurization system to be operational in Mode 3 at high pressures. This amendment request proposes to relax the TS requirements that apply in Mode 3, including the requirement that these systems be operable, during this testing. Explain why these systems are not needed to mitigate a potential accident if it were to occur at the high pressure conditions required for the testing.

## EGC Response

The special condition being requested is restricted to testing performed while pressurizing and maintaining pressure in the reactor coolant system (RCS) by balancing liquid water input against liquid water reject in a near water solid condition.

Since pressure is maintained due to a water solid condition (as opposed to the saturated condition that exists in Modes 1, 2, and 3), the loss of water inventory (due to a loss of coolant accident) would cause a rapid RCS pressure drop well before any emergency injection system reactor vessel water level auto initiation setpoints are reached, with level well above the top of active fuel.

The pressure loss from a water solid condition is such that the automatic depressurization system is NOT required to drop pressure below the shutoff head of the low pressure injection systems. A minimum of two (2) emergency injection systems are required to remain operable in Mode 4 and also in the special condition being requested. The operable emergency injection systems will be sufficient to mitigate a potential accident with high pressure coolant injection (or high pressure core spray) and the automatic depressurization system inoperable.