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

February 3, 2016

Mr. Bryan C. Hanson
Senior Vice President
Exelon Generation Company, LLC
President and Chief Nuclear Officer (CNO)
Exelon Nuclear
4300 Winfield Road
Warrenville, IL 60555

SUBJECT: DRESDEN NUCLEAR POWER STATION, UNITS 2 AND 3; LASALLE COUNTY STATION, UNITS 1 AND 2; AND QUAD CITIES NUCLEAR POWER STATION, UNITS 1 AND 2 – RECENT AMENDMENTS ADDING TECHNICAL SPECIFICATION 3.10.8, "INSERVICE LEAK AND HYDROSTATIC TESTING OPERATIONS"

Dear Mr. Hanson:

On December 17, 2015 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML15324A439), the U.S. Nuclear Regulatory Commission (NRC) issued the following amendments:

1. Amendment No. 248 to Renewed Facility Operating License No. DPR-19 and Amendment No. 241 to Renewed Facility Operating License No. DPR-25 for Dresden Nuclear Power Station (DNPS), Units 2 and 3, respectively,
2. Amendment No. 219 to Facility Operating License No. NPF-11 and Amendment No. 205 to Facility Operating License No. NPF-18 for the LaSalle County Station (LSCS), Units 1 and 2, respectively, and
3. Amendment No. 261 to Renewed Facility Operating License No. DPR-29 and Amendment No. 256 to Renewed Facility Operating License No. DPR-30 for the Quad Cities Nuclear Power Station (QCNPS), Units 1 and 2, respectively.

The amendments added a new technical specification, Section 3.10.8, "Inservice Leak and Hydrostatic Testing Operation," including a new limiting condition for operation (LCO). After issuance of the amendments, Exelon Generation Company, LLC (Exelon, the licensee) informed the NRC staff of an issue with the underlined portion of the following paragraph from page 8 of the associated safety evaluation (SE):

> Prior to use of the special operation LCO 3.10.8 for the inservice leakage and hydrostatic testing of the RCS [reactor coolant system], all main steam isolation valves and the primary containment isolation valves connected to RCS should be in their fully closed position, even though the primary containment is inoperable. Therefore, if there is a main steam line break in the secondary containment during use of the LCO, the resulting conditions inside and outside the secondary containment are bounded by the conditions resulting from a large main steam line break inside the secondary containment in Mode 1 described in UFSAR [updated final safety analysis report] Section 15.6.4 (for all six plants) because the SGTS [standby gas treatment system] and secondary containment are

operable for all six plants. Based on this, the NRC staff finds the proposed LCO 3.10.8 acceptable to the extent that GDC [general design criterion]-16 for LSCS and draft GDC-10 for DNPS and QCNPS would continue to be satisfied.

The NRC staff discussed this issue with Exelon personnel during a call on January 28, 2016. Exelon explained that some of the isolation valves are open or bypassed during testing to maintain shutdown cooling capability or to facilitate the 10-year extended boundary test of the reactor coolant system.

As discussed in the license amendment request and reinforced by Exelon during the call, the plant conditions and conservatisms in the main steam line break analysis (UFSAR Section 15.6.4) envelope the expected conditions during testing. Exelon stated that its UFSAR Section 15.6.4 analysis assumed full power operations and did not take credit for secondary containment and the SGTS. Under the test conditions, the reactor is not operating and the RCS has a lower temperature thus any break would result in a smaller source term. Furthermore, LCO 3.10.8 requires that secondary containment and the SGTS are operable such that any radioactive release would be reduced due to holdup within secondary containment and filtration through the SGTS.

The NRC staff considered the potential for some of the isolation valves to be open or bypassed during testing and determined that this does not alter the staff's finding in the SE that the UFSAR Section 15.6.4 analysis bounds the consequences of a pipe break in the primary system under the test conditions. Therefore, the staff's conclusions in the SE are not affected. The staff does not expect the licensee to change how it performs its testing to conform to the above statement. If you have any questions, please contact me at 301-415-1380.

Sincerely,

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

Docket Nos. 50-237, 50-249, 50-373,
50-374, 50-254, and 50-265

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Sincerely,

/RA/

Blake Purnell, Project Manager
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