



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

February 29, 2016

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

SUBJECT: SAFETY EVALUATION REPORT WITH OPEN ITEMS RELATED TO THE
LASALLE COUNTY STATION, UNITS 1 AND 2 (TAC NOS. MF5347 AND
MF5346)

Dear Mr. Gallagher:

By letter dated December 9, 2014, Exelon Generation Company, LLC (Exelon or the applicant) submitted a license renewal application (LRA) pursuant to Title 10 of the *Code of Federal Regulations* Part 54, to renew operating licenses NPF-11 and NPF-18 for LaSalle County Station (LSCS), Units 1 and 2, respectively, for review by the U.S. Nuclear Regulatory Commission (NRC or the staff). The staff determined that the LRA was complete and acceptable for docketing on January 26, 2015.

The staff has reviewed the LSCS LRA and has developed the enclosed "Safety Evaluation Report with Open Items Related to the License Renewal of LaSalle County Station, Units 1 and 2" (ML16053A439), hereinafter referred to as the Safety Evaluation Report (SER). This SER reflects the status of the staff's review of the LRA to date, requests for additional information (RAIs), and the applicant's responses to the staff's RAIs and other questions related to the LRA through February 1, 2016, unless otherwise noted. It also identifies open items remaining in the review.

The staff has identified 2 open items in its review, which must be resolved before it can make a final determination on the application. SER Section 1.5 includes the open items with summaries of information required to resolve each issue. The open items each have an associated RAI described below. Despite active efforts to reach technical resolution, the staff's review of these issues continues, pending resolution of the RAIs.

Open Item 3.0.3.1.2-1 BWR Vessel ID Attachment Welds

The LRA describes the BWR Vessel ID Attachment Welds program as an existing program that is consistent with the program elements in Generic Aging Lessons Learned (GALL) Report aging management program (AMP) XI.M4, "BWR Vessel ID Attachment Welds." During the AMP audit, the staff reviewed documents relevant to the program, including ER-AB-331, Revision 14, and verified that program elements 1 through 6 are consistent with the corresponding program elements of GALL Report AMP XI.M4. However, during the subsequent NRC IP-71002, "License Renewal Inspection," at LSCS, the staff reviewed the applicant's document ER-AB-331 again and noted that changes to the examination qualification requirements in BWRVIP 03, "Reactor Pressure Vessel and Internals

Examination Requirements,” regarding enhanced visual examinations (EVT-1s) may have reduced the effective examination coverage to zero percent in some cases. The Boiling Water Reactor Vessel and Internals Project (BWRVIP) guidelines provide no minimum required effective examination coverage for EVT-1 examinations. Based on the AMP Audit Report dated September 22, 2015, the staff notes that the ER-AB-331 is the main implementing document for the applicant’s BWR Vessel ID Attachment Welds and BWR Vessel Internals AMPs.

The staff required additional information to verify that the applicant’s program will adequately monitor the condition of applicable welds during the period of extended operation. On February 16, 2016, the staff issued a request for additional information (RAI) requesting clarification from the applicant related to the EVT-1s performed at LSCS. Pending resolution of the issues related to the EVT-1s, this is identified as OI 3.0.3.1.2-1.

Open Item 3.0.3.1.5-1 BWR Stress Corrosion Cracking

During its review of recent LSCS Inservice Inspection Summary Reports, the staff noted that the examination coverage for several BWRVIP-75-A welds was only 50 percent. These welds are part of the program for Generic Letter 88-01, “NRC Position on IGSCC in BWR Austenitic Stainless Steel Piping,” and the associated inspections are classified as “Augmented Inservice Inspections.” Because of this classification, the applicant does not submit relief requests for the limited examination coverage, as would be necessary if they were ASME-required inspections where less than 90 percent of the weld is covered.

Based on additional information from the NRC IP-71002, “License Renewal Inspection” at LSCS, the staff became aware of an Exelon position that inspections in other BWRVIP programs will be credited for any percentage coverage because the BWRVIP program does not specify an examination coverage percentage. On February 16, 2016, the staff issued an RAI to confirm the percentage of examination coverage that Exelon considers meeting BWRVIP-75-A and to provide the technical bases for crediting examinations when the coverage obtained is less than 90 percent. Pending applicant’s response to this RAI, and the satisfactory resolution of staff’s concerns related to examination coverage, this has been identified as OI 3.0.3.1.5-1.

In accordance with the schedule for completing the review of LaSalle County Station, Units 1 and 2 LRA, the applicant is requested to review the enclosed SER, verify its accuracy, and provide comments to the staff within 45 days from the date of this letter. The next milestone for this project is the Advisory Committee on Reactor Safeguards Subcommittee meeting on April 19, 2016.

M. Gallagher

- 3 -

If you have any questions regarding this matter, please contact the license renewal project manager, Mr. Jeffrey Mitchell, at 301-415-3019 or by e-mail at Jeffrey.Mitchell2@nrc.gov.

Sincerely,

/RA/

Christopher G. Miller, Director
Division of License Renewal
Office of Nuclear Reactor Regulation

Docket Nos. 50-373 and 50-374

Enclosure:
As stated

cc: Listserv

M. Gallagher

- 3 -

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Letter to Michael Gallagher from Jeffrey S. Mitchell dated February 29, 2016

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