



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

June 15, 2017

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: LASALLE COUNTY STATION, UNITS 1 AND 2, REQUEST FOR ADDITIONAL INFORMATION REGARDING LICENSE AMENDMENT REQUEST FOR EXTENSION OF TYPE A AND TYPE C LEAK RATE TEST FREQUENCIES (CAC NOS. MF8700 AND MF8701)

Dear Mr. Hanson:

By letter dated October 26, 2016, Exelon Generation Company, LLC (the licensee) submitted an amendment request for LaSalle County Station, Units 1 and 2. The proposed amendment would revise technical specification 5.5.13, "Primary Containment Leakage Rate Testing Program," to allow for the permanent extension of the Type A integrated leak rate testing and Type C leak rate testing frequencies.

The U.S. Nuclear Regulatory Commission (NRC) staff reviewed your submittal and has determined that additional information is required to complete the review. The specific information requested is addressed in the enclosure to this letter. During the telephone call on June 14, 2017, between the NRC staff and the licensee for clarification of these requests for additional information, it was agreed that the licensee will provide a response no later than July 17, 2017.

The NRC staff considers that timely responses to requests for additional information help ensure sufficient time is available for NRC staff review and contribute toward the NRC's goal of efficient and effective use of staff resources.

If you have any questions, please call me at 301-415-3308.

Sincerely,

A handwritten signature in black ink that reads "Bhalchandra Vaidya".

Bhalchandra Vaidya, Project Manager
Plant Licensing Branch III
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-373 and 50-374

Enclosure: As stated

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REQUEST FOR ADDITIONAL INFORMATION

EXTENSION OF TYPE A AND TYPE C CONTAINMENT LEAK RATE TEST INTERVALS

LASALLE COUNTY STATION, UNITS 1 and 2

DOCKET NO.: 50-373, 50-374

CAC NOS.: MF8700 AND MF8701

In order for U.S. Nuclear Regulatory Commission (NRC) staff to assess the effectiveness and performance, including the results, under title 10 of the *Code of Federal Regulations* (10 CFR), Part 50, Appendix J, Option B, implementation at La Salle County Station (LSCS), Units 1 and 2, please provide the following additional information:

SBPB - RAI-1

Referring to Table 3.2.5-1 "LSCS Unit 1 Type A Test History" and Table 3.2.5-2 "LSCS Unit 2 Type A Test History" of Attachment 1 to the submittal, please provide past Type A integrated leak rate testing (ILRT) results.

- a. Provide a breakdown of the results into "As-found minimum leakage rate" and "As-left maximum leakage rate," to enable the NRC staff evaluation of the results against performance criteria and restart acceptance criteria.
- b. Technical Specification (TS) 5.5.13 states that the peak calculated primary containment pressure for the design basis loss of cooling accident is P_a (pressure absolute), at 42.6 pounds per square inch gauge (psig). Section 9.2.3 "Extended Test Intervals" of Nuclear Energy Institute (NEI) 94-01, Revision 2-A, states that "in the event where previous Type A tests were performed at reduced pressure (as described in 10 CFR 50, Appendix J, Option B), at least one of the two consecutive periodic Type A tests shall be performed at peak accident pressure (P_a). Provide the actual ILRT pressures employed during the last recent Type A tests for both LSCS units.

SBPB - RAI-2

In Table 3.7.1-1 "NEI 94-01 Revision 2-A, Limitations and Conditions" of Attachment 1 to the submittal, it states that:

LSCS will utilize the definition in NEI 94-01 Revision 3-A, Section 5.0. This definition has remained unchanged from Revision 2-A to Revision 3-A of NEI 94-01

Tables 3.2.5-1 and 3.2.5-2 provided the historical ILRT results for LSCS, Units 1 and 2.

Provide the definition of "performance leakage rate" used in Tables 3.2.5-1 and 3.2.5-2 during historical ILRT results for LSCS, Units 1 and 2, with a comparison and/or a conclusion that it is consistent with the definition in NEI 94-01, Revisions 2-A and 3-A, which includes the clarification provided in the NRC's safety evaluation (SE).

Enclosure

SBPB - RAI-3

In Table 3.7.1.1 of Attachment 1 to the submittal, the licensee indicates that "... there are no major modifications planned." Section 9.2.4 of NEI Topical Report 94-01, Revision 2, indicates that Type A testing is required after major modifications to the containment, or upon approval by the NRC, the licensee may perform a short duration structural test of the containment. For minor modifications or modifications to the pressure boundary, a local leak rate test (LLRT) was indicated.

As the LSCS, Unit 1 and 2, containments have been in service for more than 40 years, provide a summary of all significant modifications to the Units 1 and 2 containments since the last ILRTs and the subsequent post-modification testing. The summary should discuss the extent to which actions were completed consistent with the NRC staff limitations and conditions in the staff SE dated June 25, 2008 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML081140105), which endorsed NEI 94-01, Revision 2.

SBPB - RAI-4

Table 3.4.5-3 "LSCS Unit 1 Type B and Type C LLRT Program Implementation Review" and Table 3.4.5-4 "LSCS Unit 2 Type B and Type C LLRT Program Implementation Review" of Attachment 1 to the submittal, identified components that were on extended intervals and have not demonstrated acceptable performance during the last two outages for Unit 1 (L1R15-2014 and L1R16-2016) and Unit 2 (L2R14-2013 and L2R15-2015).

Provide the "As-found" and "As-left" maximum pathway leakage rate and minimum pathway leakage rate values, respectively, for the penetrations associated with the failed components.

SBPB - RAI-5

Provide a total count of Type B and Type C components at LSCS, Units 1 and 2, and how many of them are currently on extended performance-based test intervals of 120 months for Type B and 60 months for Type C.

SBPB - RAI-6

In a supplemental letter dated February 16, 2017, EGC stated that two new primary containment isolation valves (PCIVs) will be added to the 10 CFR Part 50, Appendix J, program at each of LPCS, Units 1 and 2. The valves are being added in response to the NRC issued Order EA-13-109, "Issuance of Order to Modify Licenses with Regard to Reliable Hardened Containment Vents Capable of Operation under Severe Accident Conditions," to all operating boiling-water reactor licenses with Mark I and Mark II containments.

Provide details regarding post-modification Appendix J leak rate testing of the subject penetrations that would be conducted prior to resuming power operations after the new PCIVs are installed during the spring 2017 refueling outage for Unit 2 and the spring refueling outage of 2018 for Unit 1, including the acceptance criteria of the test results, including information if a new opening through the primary containment is required or an existing opening would suffice.

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