



Order No. EA-12-049

RS-17-094

August 28, 2017

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

LaSalle County Station, Unit 1
Facility Operating License No. NPF-11
NRC Docket No. 50-373

Subject: Ninth Six-Month Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049)

References:

1. NRC Order Number EA-12-049, "Issuance of Order to Modify Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events," dated March 12, 2012
2. NRC Interim Staff Guidance JLD-ISG-2012-01, "Compliance with Order EA-12-049, Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events," Revision 0, dated August 29, 2012
3. NEI 12-06, "Diverse and Flexible Coping Strategies (FLEX) Implementation Guide," Revision 0, dated August 2012
4. Exelon Generation Company, LLC's Initial Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049), dated October 25, 2012
5. Exelon Generation Company, LLC Overall Integrated Plan in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049), dated February 28, 2013 (RS-13-021)
6. Exelon Generation Company, LLC First Six-Month Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049), dated August 28, 2013 (RS-13-121)

7. Exelon Generation Company, LLC Second Six-Month Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049), dated February 28, 2014 (RS-14-011)
8. Exelon Generation Company, LLC Third Six-Month Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049), dated August 28, 2014 (RS-14-209)
9. Exelon Generation Company, LLC Fourth Six-Month Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049), dated February 27, 2015 (RS-15-020)
10. Exelon Generation Company, LLC Fifth Six-Month Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049), dated August 28, 2015 (RS-15-211)
11. Exelon Generation Company, LLC Sixth Six-Month Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049), dated February 26, 2016 (RS-16-023)
12. Exelon Generation Company, LLC Seventh Six-Month Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049), dated August 26, 2016 (RS-16-146)
13. Exelon Generation Company, LLC Eighth Six-Month Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049), dated February 28, 2017 (RS-17-019)
14. NRC letter to Exelon Generation Company, LLC, LaSalle County Station, Units 1 and 2 – Interim Staff Evaluation Relating to Overall Integrated Plan in Response to Order EA-12-049 (Mitigation Strategies) (TAC Nos. MF1121 and MF1122), dated February 21, 2014
15. NRC letter to Exelon Generation Company, LLC, LaSalle County Station, Units 1 and 2 – Report for the Onsite Audit Regarding Implementation of Mitigating Strategies and Reliable Spent Fuel Pool Instrumentation Related to Orders EA-12-049 and EA-12-051 (TAC Nos. MF1119, MF1120, MF1121, and MF1122), dated March 23, 2015

On March 12, 2012, the Nuclear Regulatory Commission (“NRC” or “Commission”) issued an order (Reference 1) to Exelon Generation Company, LLC (EGC). Reference 1 was immediately effective and directs EGC to develop, implement, and maintain guidance and strategies to maintain or restore core cooling, containment, and spent fuel pool cooling capabilities in the

event of a beyond-design-basis external event. Specific requirements are outlined in Attachment 2 of Reference 1.

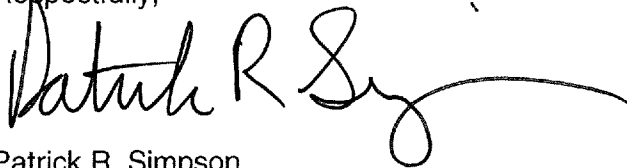
Reference 1 required submission of an initial status report 60 days following issuance of the final interim staff guidance (Reference 2) and an overall integrated plan pursuant to Section IV, Condition C. Reference 2 endorses industry guidance document NEI 12-06, Revision 0 (Reference 3) with clarifications and exceptions identified in Reference 2. Reference 4 provided the EGC initial status report regarding mitigation strategies. Reference 5 provided the LaSalle County Station, Units 1 and 2 Overall Integrated Plan.

Reference 1 requires submission of a status report at six-month intervals following submittal of the Overall Integrated Plan. Reference 3 provides direction regarding the content of the status reports. References 6, 7, 8, 9, 10, 11, 12, and 13 provided the first, second, third, fourth, fifth, sixth, seventh, and eighth six-month status reports, respectively, pursuant to Section IV, Condition C.2, of Reference 1 for LaSalle County Station. The purpose of this letter is to provide the ninth six-month status report pursuant to Section IV, Condition C.2, of Reference 1, that delineates progress made in implementing the requirements of Reference 1. The enclosed report provides an update of milestone accomplishments since the last status report, including any changes to the compliance method, schedule, or need for relief and the basis, if any. The enclosed report also addresses the NRC Interim Staff Evaluation Open and Confirmatory Items contained in Reference 14, and any NRC Audit Report open items contained in Reference 15.

This letter contains no new regulatory commitments. If you have any questions regarding this report, please contact David J. Distel at 610-765-5517.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 28th day of August 2017.

Respectfully,



Patrick R. Simpson
Manager - Licensing
Exelon Generation Company, LLC

Enclosure: LaSalle County Station, Unit 1 Ninth Six-Month Status Report for the Implementation of Order EA-12-049, Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events

cc: NRC Regional Administrator - Region III
NRC Senior Resident Inspector – LaSalle County Station
NRC Project Manager, NRR – LaSalle County Station
Mr. John P. Boska, NRR/JLD/JOMB, NRC
Illinois Emergency Management Agency - Division of Nuclear Safety

Enclosure

LaSalle County Station, Unit 1

**Ninth Six-Month Status Report for the Implementation of Order EA-12-049, Order
Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-
Design-Basis External Events**

(30 pages)

LaSalle County Station Unit 1
Ninth Six Month Status Report for the Implementation of FLEX

Enclosure

1 Introduction

LaSalle County Station, Units 1 and 2 developed an Overall Integrated Plan (Reference 1) documenting the diverse and flexible strategies (FLEX) in response to Reference 2. This enclosure provides an update of milestone accomplishments since submittal of the Overall Integrated Plan, including any changes to the compliance method, schedule, or need for relief/relaxation and the basis, if any.

With the report of Unit 2 full compliance (Ref.15) on April 4, 2017, this six month update provides the status of LaSalle County Station Unit 1 mitigating strategies implementation.

NOTE: The "Status" indicated in this document is as of August 1, 2017. This date was chosen to support the development, review, approval and submittal of this report by the required August 28, 2017 due date.

2 Milestone Accomplishments

- The Eighth 6-Month Update was submitted in February 2017 (Ref. 14).
- LaSalle Unit 2 completed full implementation of FLEX strategies, inclusive of Phase 1 Hardened Vents, before startup from L2R16 Refuel Outage on March 8, 2017.

3 Milestone Schedule Status

The following provides an update to Attachment 2 of the Overall Integrated Plan. It provides the activity status of each item, and whether the expected completion date has changed. The dates are planning dates subject to change as design and implementation details are developed.

Activity	Target Completion Date	Activity Status	Revised Target Completion Date
Submit 60 Day Status Report	Oct 2012	Complete	
Submit Overall Integrated Plan	Feb 2013	Complete	
Contract with National SAFER Response Center (NSRC)		Complete	
Submit 6 Month Updates:			
Update 1	Aug 2013	Complete	
Update 2	Feb 2014	Complete	
Update 3	Aug 2014	Complete	
Update 4	Feb 2015	Complete	
Update 5	Aug 2015	Complete	
Update 6	Feb 2016	Complete	
Update 7	Aug 2016	Complete	
Update 8	Feb 2017	Complete	
Update 9	Aug 2017	Complete with this submittal.	
Submit Completion Report Unit 1 (and FIP)	Mar 2016	Not Started	May 2018 See Section 5 of this enclosure.
Submit Completion Report Unit 2		Complete	April 2017

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Activity	Target Completion Date	Activity Status	Revised Target Completion Date
Modification Development & Implementation:			
Unit 1 Modification Development (All FLEX Phases)	Jan 2015	Complete	
Unit 1 Modification Implementation (All FLEX Phases)	Mar 2016	Complete	
Procedures:			
Create Site-Specific Procedures	Feb 2015	Complete	
Validate Procedures (NEI 12-06, Sect. 11.4.3)	Feb 2015	Complete	
Create Maintenance Procedures	Feb 2015	Complete	
Perform Staffing Analysis	Oct 2014	Complete	
Storage Plan and Construction	Feb 2015	Complete	
FLEX Equipment Acquisition	Feb 2015	Complete	

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Activity	Target Completion Date	Activity Status	Revised Target Completion Date
Training Completion	Feb 2015	Complete	
National SAFER Response Center Operational	Dec 2014	Complete	
Unit 1 FLEX Implementation	Mar 2016	Started	Mar 2018 See Section 5 of this enclosure
Full Site FLEX Implementation	Mar 2016	Started	Mar 2018 See Section 5 of this enclosure

4 Changes to Compliance Method

Exelon proposes an alternate approach to NEI 12-06 Revision 0 for protection of FLEX equipment as stated in Section 5.3.1 (seismic-protection of FLEX equipment), Section 7.3.1 (severe storms with high winds - protection of FLEX equipment), and Section 8.3.1 (impact of snow, ice and extreme cold - protection of FLEX equipment). This alternate approach is to store "N" sets of equipment in a fully robust building and selected +1 equipment in a commercial building. Note that for LaSalle, most of the +1 equipment is stored in a fully robust building. For all hazards scoped in for the site, the FLEX equipment is stored in a configuration such that no one external event can reasonably fail the site FLEX capability (N).

To ensure that no one external event will reasonably fail the site FLEX capability (N), Exelon will ensure that N equipment is protected in the robust building. To accomplish this, Exelon has developed procedures to address the unavailability allowance as stated in NEI 12-06 Revision 0 Section 11.5.3., (see Maintenance and Testing section below for further details). This section allows for a 90-day period of unavailability. If a piece of FLEX equipment stored in the robust building were to become or were found to be unavailable, Exelon will impose a shorter allowed outage time of 45 days. For portable equipment that is expected to be unavailable for more than 45 days, actions will be initiated within 24 hours of this determination to restore the site FLEX capability (N) in the robust storage location and implement compensatory measures (e.g., move the +1 piece of equipment into the robust building) within 72 hours where the total unavailability time is not to exceed 45 days. Once the site FLEX capability (N) is restored in the robust storage location, Exelon will enter the 90-day allowed out of service time for the unavailable piece of equipment with an entry date and time from the discovery date and time.

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MAINTENANCE AND TESTING

1. The unavailability of equipment and applicable connections that directly performs a FLEX mitigation strategy for core, containment, and SFP should be managed such that risk to mitigating strategy capability is minimized.
 - a. The unavailability of plant equipment is controlled by existing plant processes such as the Technical Specifications. When plant equipment which supports FLEX strategies becomes unavailable, then the FLEX strategy affected by this unavailability does not need to be maintained during the unavailability.
 - b. The required FLEX equipment may be unavailable for 90 days provided that the site FLEX capability (N) is met. If the site FLEX (N) capability is met but not protected for all of the site's applicable hazards, then the allowed unavailability is reduced to 45 days.¹
 - c. The duration of FLEX equipment unavailability, discussed above, does not constitute a loss of reasonable protection from a diverse storage location protection strategy perspective.
 - d. If FLEX equipment or connections become unavailable such that the site FLEX capability (N) is not maintained, initiate actions within 24 hours to restore the site FLEX capability (N) and implement compensatory measures (e.g., use of alternate suitable equipment or supplemental personnel) within 72 hours.
 - e. If FLEX equipment or connections to permanent plant equipment required for FLEX strategies are unavailable for greater than 45/90 days, restore the FLEX capability or implement compensatory measures (e.g., use of alternate suitable equipment or supplemental personnel) prior to exceedance of the 45/90 days.

For Section 5, seismic hazard, Exelon will also incorporate these actions:

1. Large portable FLEX equipment such as pumps and power supplies will be secured as appropriate to protect them during a seismic event (i.e., Safe Shutdown Earthquake (SSE) level).
2. Stored equipment and structures will be evaluated and protected from seismic interactions to ensure that unsecured and/or non-seismic components do not damage the equipment.

For Section 7, severe storms with high winds, Exelon will also incorporate this action:

- (N+1) of on-site FLEX equipment are required. The plant screens in per Sections 5 through 9 for seismic, wind (both tornado and hurricane), snow, ice and extreme cold, and high temperatures. To meet Section 7.3.1.1.a, either of the following is acceptable:
 - All equipment (N+1) in a structure(s) that meets the plant's design basis for high wind hazards, or
 - (N) equipment in a structure(s) that meets the plant's design basis for high wind hazards and (+1) equipment stored in a location not protected for a high wind hazard.

¹The spare FLEX equipment is not required for the FLEX capability to be met. The allowance of 90-day unavailability is based on a normal plant work cycle of 12 weeks. In cases where the remaining N equipment is not fully protected for the applicable site hazards, the unavailability allowance is reduced to 45 days to match a 6-week short cycle work period. Aligning the unavailability to the site work management program is important to keep maintenance of spare FLEX equipment from inappropriately superseding other more risk significant work activities.

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For Section 8, impact of snow, ice and extreme cold, Exelon will also incorporate this action:

- Storage of FLEX equipment should account for the fact that the equipment will need to function in a timely manner. The equipment should be maintained at a temperature within a range to ensure its likely function when called upon. For example, by storage in a heated enclosure or by direct heating (e.g., jacket water, battery, engine block heater, etc.).

Exelon will meet all of the requirements in NEI 12-06 Revision 0 for Section 6.2.3.1 for external flood hazard and Section 9.3.1 for impact of high temperatures.

LaSalle has implemented OU-AA-103, Rev. 17, "Shutdown Safety Management Program."

OU-AA-103 incorporates the guidance provided in NEI position paper entitled "Shutdown/Refueling Modes". There are no plant specific issues that require any additional plans or actions to meet the guidance of the position paper.

LaSalle has implemented the preventative maintenance (PMs) requirements of CC-AA-118, Rev 2, Diverse and Flexible Coping Strategies (FLEX) and Spent Fuel Pool Instrumentation Program Document. Preventative maintenance schedules have been adjusted accordingly and implemented through the predefine work process and through operating surveillance procedures. PMs previously identified in LOS-FSG-SR1 have been located in either predefine work instructions or the series of FLEX PM procedures:

- LOS-FSG-M1, "FLEX Monthly Equipment Surveillance"
- LOS-FSG-Q1, "FLEX Quarterly Equipment Surveillance"
- LOS-FSG-SA1, "FLEX Semi-Annual Equipment Surveillance"
- LOS-FSG-A1, "FLEX Equipment Annual Inventory"
- LOS-FSG-A2, "Annual FLEX Equipment Diesel Fuel Oil Sampling"
- LOS-FSG-A3, "FLEX Annual Equipment Surveillance"
- LOS-FSG-SR1, "FLEX Equipment Surveillance"

The Unit 1 FLEX connection to 1B FC EMU Piping is currently located in the Unit 1 Reactor Building '710 elevation. Engineering Change (EC) 618667 evaluations show that, if containment venting is utilized through the HCVS, radiation levels will be too high for entry into that area. The Unit 1 FLEX connection to 1B FC EMU Piping will be relocated to the Unit 1 Diesel Generator corridor (lower dose area). Since the Unit 1 FLEX connection to 1B FC EMU piping will be located closer to the penetrations coming into the building, time validations are bounded by the original validation times.

5 Need for Relief/Relaxation and Basis for the Relief /Relaxation

Previously, by letter dated February 27, 2014 (Ref. 3), LaSalle County Station requested relaxation from certain schedule requirements of Order EA-12-049 (Ref. 2) related to installation of the severe accident capable containment vent required by Order EA-13-109 (Ref. 6). The NRC granted that schedule relief via letter dated April 15, 2014 (Ref. 4). No additional need for relief/relaxation relative to Order EA-12-049 has been identified at this time.

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6 Open Items from Overall Integrated Plan and Interim Staff Evaluation

The following tables provide a summary of the open items documented in the Overall Integrated Plan and the Interim Staff Evaluation (ISE) (Ref. 5), and the status of each item.

NOTE: The "Status" indicated below is as of August 1, 2017. This date was chosen to support the development, review, approval and submittal of this report by the required August 28, 2017 due date.

Section Reference	Overall Integrated Plan Open Item	Status
Sequence of Events (p.5)	The times to complete actions in the Events Timeline are based on operating judgment, conceptual designs, and current supporting analyses. The final timeline will be time validated once detailed designs are completed and procedures developed.	<p>COMPLETE</p> <p>Time validation has been completed sufficient to demonstrate the ability to execute the FLEX strategies. Validation results are documented in CC-LA-118-1004, "LaSalle FLEX (BDBEE) Validation Process."</p> <p>CC-LA-118-1004 has been provided in eportal.</p>
Sequence of Events (p.10)	Initial evaluations were used to determine the fuel pool timelines. Formal calculations will be performed to validate this information during development of the spent fuel pool cooling strategy detailed design.	<p>COMPLETE</p> <p>Exelon determined that the initial evaluations that were performed are sufficient.</p> <p>EC 392196 Rev. 0 "Spent Fuel Pool Uncovery Time for Outage and Online Scenarios" is provided in eportal.</p>
Sequence of Events (p.10)	Analysis of deviations between Exelon's engineering analyses and the analyses contained in BWROG Document NEDC-33771P, "GEH Evaluation of FLEX Implementation Guidelines and documentation of results on Att. IB, "NSSS Significant Reference Analysis Deviation Table." Planned to be completed and submitted with August 2013 Six Month Update.	<p>COMPLETE</p> <p>LaSalle County Station, Units 1 and 2 Second Six-Month Status Report contains the analysis.</p>

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Section Reference	Overall Integrated Plan Open Item	Status
<p>Strategy Deployment (p.11)</p>	<p>Transportation routes will be developed from the equipment storage area to the FLEX staging areas. An administrative program will be developed to ensure pathways remain clear or compensatory actions will be implemented to ensure all strategies can be deployed during all modes of operation.</p> <p>Identification of storage areas and creation of the administrative program are open items.</p>	<p>COMPLETE</p> <p>LOA-FSG-012, "FLEX Deployment Path Debris Removal," identifies the deployment routes for the FLEX equipment from the FLEX storage areas. Procedure LOS-FSG-M1, "FLEX Monthly Equipment Surveillance," contains a monthly verification that the FLEX equipment deployment paths are unobstructed.</p> <p>The LaSalle Station Snow Removal Plan has been updated to ensure these paths are cleared in a timely manner. LaSalle has established a once per four (4) year task to validate the snow removal plan. The verification of the snow removal plan is referenced in the LaSalle FLEX Program document, CC-LA-118-1001.</p> <p>CC-LA-118-1001, LOA-FSG-012 and LOS-FSG-M1 are provided in eportal.</p>

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Section Reference	Overall Integrated Plan Open Item	Status
Programmatic Controls (p.12)	An administrative program for FLEX to establish responsibilities, and testing & maintenance requirements will be implemented.	<p>COMPLETE</p> <p>Procedure CC-LA-118-1001, "Site Implementation of Diverse and Flexible Coping Strategies (FLEX) and Spent Fuel Pool Instrumentation Program," has been issued.</p> <p>CC-LA-118-1001 is provided in eportal.</p>
Core Cooling Phase 1 (p.17)	Additional work will be performed during detailed design development to ensure Suppression Pool temperature will support RCIC operation, in accordance with approved BWROG analysis, throughout the event.	<p>COMPLETE</p> <p>The evaluation (EC 399297, Rev 0) shows that RCIC can survive for the first 13 hours of an ELAP with no plant modifications.</p> <p>EC 399297 Rev. 0 is provided in eportal.</p>
Fuel Pool Cooling Phase 1 (p.35)	Complete an evaluation of the spent fuel pool area for steam and condensation.	<p>COMPLETE</p> <p>The evaluation, Calc L-003968, Rev. 0) has been completed showing habitability conditions in the spent fuel pool area.</p> <p>Rev. 0. Calc L-003968 Rev. 0 is provided in eportal.</p>

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Section Reference	Overall Integrated Plan Open Item	Status
<p>Safety Functions Support Phase 1 (p.44)</p>	<p>Evaluate the habitability conditions for the Main Control Room and develop a strategy to maintain habitability.</p>	<p>COMPLETE</p> <p>The evaluation has been completed showing habitability maintained with the incorporation of cooling fans per the developed strategy contained in LOA-FSG-005, "Area Ventilation."</p> <p>Evaluation documented in calculation L-003969 Rev. 0.</p> <p>Calc L-003969 Rev. 0 and LOA-FSG-005 are provided in eportal.</p>
<p>Safety Functions Support Phase 1 (p.44)</p>	<p>Evaluate the habitability conditions for the Auxiliary Electric Equipment Room (AEER) and develop a strategy to maintain habitability.</p>	<p>COMPLETE</p> <p>The evaluation has been completed showing habitability maintained with the incorporation of cooling fans per the developed strategy contained in LOA-FSG-005, Area Ventilation."</p> <p>Evaluation documented in calculation L-003969 Rev. 0.</p> <p>Calc L-003969 Rev. 0 and LOA-FSG-005 are provided in eportal.</p>

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Section Reference	Overall Integrated Plan Open Item	Status
Safety Functions Support Phase 2 (p.48)	Develop a procedure to prop open battery room doors upon energizing the battery chargers to prevent a buildup of hydrogen in the battery rooms.	<p>COMPLETE</p> <p>LOA-FSG-005, "Area Ventilation," addresses propping open the applicable battery room doors.</p> <p>LOA-FSG-005 is provided in eportal.</p>
Maintain Core Cooling Phase 2 (Pg. 23)	<p>The Unit 1 FLEX connection to 1B FC EMU Piping is currently located in the Unit 1 Reactor Building '710 elevation. EC 618667 evaluations show if containment venting is utilized through the HCVS, radiation levels will be too high for entry into that area. The Unit 1 FLEX connection to 1B FC EMU Piping will be relocated to the Unit 1 Diesel Generator corridor (lower dose area).</p> <p>Since the Unit 1 FLEX connection to 1B FC EMU Piping will be located closer to the penetrations coming into the building, time validations are bounded by the original validation times.</p>	<p>STARTED</p> <p>Work is scheduled to begin and complete in September 2017.</p> <p>EC 618667 will be entered in ePortal once the EC is approved.</p>

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Interim Staff Evaluation Open and Confirmatory Items		
<u>Open Items</u>		
Item Number	Description	Status
3.2.3.A	Verify the modifications associated with Order EA-13-109 on a Hardened Containment Vent System support the sequence of events and actions associated with the LSCS mitigating strategies.	<p>COMPLETE</p> <p>Item Closed During Onsite NRC Audit (Ref. 16).</p> <p>From 8/28/14 update, ML14248A239:</p> <p>The modifications associated with Order EA 13-109 are scheduled to complete installation at LSCS in 2017 (Unit 2) and 2018 (Unit 1). The modifications will be designed to support the LSCS mitigating strategies.</p>
<u>Confirmatory Items</u>		
Item Number	Description	Status
3.1.1.2.A	Confirm that soil liquefaction will not prevent movement of equipment along transportation paths.	<p>COMPLETE</p> <p>Item Closed During Onsite NRC Audit (Ref. 16).</p> <p>While on site the NRC staff reviewed LaSalle Station Design Analysis L-004000, "Evaluation of Liquefaction Potential for BDBEE [beyond-design-basis external event] FLEX Staging Area and Equipment Deployment Paths." The review focused on whether the licensee's planned deployment and storage location are susceptible to seismically-induced soil</p>

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Interim Staff Evaluation Open and Confirmatory Items		
Item Number	Description	Status
		<p>liquefaction to a degree that will adversely affect the implementation of FLEX strategies following a seismic event. The calculation concludes that all haul path areas are not susceptible to liquefaction with the exception of one localized area near the deployment path associated with the 60X90 FLEX building inside the PA. The calculation stated that the vertical settlement resulting from liquefaction would be approximately 2 inches. The licensee stated that the mobile FLEX equipment vehicles have more than sufficient capacity to traverse 2-inch localized roadway depressions, should they appear following a seismic event. The staff had no further questions regarding liquefaction potential of the FLEX deployment paths.</p> <p>Implementation of the Hardened Containment Vent System (HCVS) required moving the pre-planned staging area for the FLEX generators due to anticipated dose rates from the HCVS. L-004000 documents that the new staging areas are acceptable.</p> <p>Calc L-004000 Rev. 0 is provided in eportal.</p>

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Interim Staff Evaluation Open and Confirmatory Items		
Item Number	Description	Status
3.1.1.2.B	Confirm that the egress path for personnel to reach the FLEX storage building is seismically robust, or multiple egress paths that are not seismically robust are identified.	<p>COMPLETE</p> <p>Item Closed During Onsite NRC Audit (Ref. 16).</p> <p>While on site the NRC staff reviewed and walked down egress and ingress paths for personnel to reach the FLEX storage buildings. The review focused on whether ingress/egress paths are seismically robust and, if not, are multiple paths available. The licensee stated that paths for personnel responding to FLEX equipment storage buildings are partially seismically robust (portions inside seismic structures) and there are multiple paths available for personnel to leave the power block. The staff had no further questions regarding ingress or egress paths for FLEX implementation.</p>

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Interim Staff Evaluation Open and Confirmatory Items		
Item Number	Description	Status
3.1.1.4.A	Confirm that the logistics for equipment transportation, area set up, and other needs for ensuring the equipment and commodities to sustain the site's coping strategies are available from offsite resources.	<p>COMPLETE</p> <p>Item Closed During Onsite NRC Audit (Ref. 16).</p> <p>AREVA Document No. 51-9233422, "LaSalle County Nuclear Generating Station SAFER Response Plan," Rev. 0, 12/19/14, showed that Staging Area C is the Pontiac Municipal Airport, Pontiac, IL, and the alternate to that (Staging Area D) was the Illinois Valley Regional Airport.</p> <p>LaSalle specific procedure CC-LA-118-1002, "SAFER Response Plan for LaSalle County Generating Station 38-9233758, Revision 1 has changed the Staging Area D to the Braidwood Station owner controlled area.</p> <p>Staging Area B is the plant contractor parking lot.</p> <p>Exelon Procedure EP-AA-112-400-F-04, "EOF Logistics Manager Checklist," Section 3.7, includes coordination for the SAFER Response Plan, including notifying the facility managers for Staging Areas C and D, obtaining road conditions, becoming the single point of contact for SAFER, and preparing for the arrival of SAFER personnel.</p>

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Interim Staff Evaluation Open and Confirmatory Items		
Item Number	Description	Status
		<p>Croman Corporation has filed a helicopter flight plan for the route from Pontiac airport to LaSalle. The State of Illinois Plan for Radiological Accidents (IPRA) shows that the State will cooperate with Exelon to provide law enforcement escorts for SAFER vehicles and provide helicopters (if available).</p> <p>AREVA Document No. 51-9233422, CC-LA-118-1002, EP-AA-112-400-F-04 are provided in eportal.</p>
3.1.3.1.A	<p>If the licensee credits separation of storage sites to address tornado threats, confirm that the axis of separation and distance between storage locations will provide assurance that a single tornado would not impact all locations if the licensee relies on NEI 12-06, Section 7.3.1, configurations I b or I.c for protection of the portable equipment from the high winds hazard.</p>	<p>COMPLETE</p> <p>Per Ref. 16, this ISE/Audit Item remains open as it relates to use of a commercial (non- robust) FLEX building for storage of the N+1 equipment. Exelon/LaSalle is proposing the use of an alternate approach in Section 4 of this document. Therefore, response to this item is complete.</p>

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Interim Staff Evaluation Open and Confirmatory Items		
Item Number	Description	Status
3.2.1.1.A	Confirm that benchmarks are identified and discussed that demonstrate that the Modular Accident Analysis Program (MAAP) is an appropriate code for the simulation of an ELAP event at LSCS.	<p>COMPLETE</p> <p>Item Closed During Onsite NRC Audit (Ref. 16).</p> <p>LS-MISC-025 Rev. 1 was referenced for item closure during the NRC Audit.</p> <p>LS-MISC-025 Rev. 1 is provided in eportal.</p>
3.2.1.1.B	Confirm that the collapsed level remains above Top of Active Fuel (TAP) and the cool down rate remains within technical specification limits for MAAP analyses.	<p>COMPLETE</p> <p>Item Closed During Onsite NRC Audit (Ref. 16).</p> <p>LS-MISC-025 Rev. 1 was referenced for item closure during the NRC Audit.</p> <p>LS-MISC-025 Rev. 1 is provided in eportal.</p>
3.2.1.1.C	Confirm that MAAP is used in accordance with Sections 4.1, 4.2, 4.3, 4.4, and 4.5 of the June 2013 position paper (ADAMS Accession No. ML13190A201).	<p>COMPLETE</p> <p>Item Closed During Onsite NRC Audit (Ref. 16).</p> <p>LS-MISC-025 Rev. 1 was referenced for item closure during the NRC Audit.</p> <p>LS-MISC-025 Rev. 1 is provided in eportal.</p>

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Interim Staff Evaluation Open and Confirmatory Items		
Item Number	Description	Status
3.2.1.1.D	Confirm that the licensee identifies and justifies the subset of key modeling parameters cited from Tables 4-1 through 4-6 of the "MAAP Application Guidance, Desktop Reference for Using MAAP Software, Revision 2" (Electric Power Research Institute Report 1020236). This should include response at a plant specific level regarding specific modeling options and parameter choices for key models that would be expected to substantially affect the ELAP analysis performed for that licensee's plant.	<p>COMPLETE</p> <p>Item Closed During Onsite NRC Audit (Ref. 16).</p> <p>LS-MISC-025 Rev. 1 was referenced for item closure during the NRC Audit.</p> <p>LS-MISC-025 Rev. 1 is provided in eportal.</p>
3.2.1.1.E	Confirm that the specific MAAP analysis case that was used to validate the timing of mitigating strategies in the Integrated Plan is identified and is appropriate for LSCS. Alternately, a comparable level of information may be included in the supplemental response.	<p>COMPLETE</p> <p>Item Closed During Onsite NRC Audit (Ref. 16).</p> <p>LS-MISC-025 Rev. 1 was referenced for item closure during the NRC Audit.</p> <p>LS-MISC-025 Rev. 1 is provided in eportal.</p>
3.2.1.2.A	Confirm adequacy of the technical basis for the assumptions made regarding the leakage rate through the recirculation pump seals and other sources. The analysis should include the assumed pressure-dependence of the leakage rate, and whether the leakage was determined or assumed to be single-phase liquid, two-phase mixture, or steam at the donor cell, and how mixing the leakage flow with the drywell atmosphere is modeled.	<p>COMPLETE</p> <p>Item Closed During Onsite NRC Audit (Ref. 16).</p> <p>LS-MISC-025 Rev. 1 was referenced for item closure during the NRC Audit.</p> <p>LS-MISC-025 Rev. 1 is provided in eportal.</p>

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Interim Staff Evaluation Open and Confirmatory Items		
Item Number	Description	Status
3.2.1.3.A	Confirm that taking readings from a standpipe which is not safety related or seismic does not make the CST level instrumentation inadequate for the automatic swap or informing the operators of CST loss so that they may respond with manual action using the control switches located in the main control room.	<p>COMPLETE</p> <p>Item Closed During Onsite NRC Audit (Ref. 16).</p> <p>With a potential loss of the CST Standpipe, which is located inside of the Turbine Building, the water would no longer be present to indicate high level; therefore, because the level instruments are seismically qualified, they will remain adequate to support the automatic suction source swap.</p>

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Interim Staff Evaluation Open and Confirmatory Items		
Item Number	Description	Status
3.2.1.4.A	Confirm that pump sizing results consider required water flow rates, the portable/FLEX pump complete head/flow characteristics, suction and discharge losses, system backpressure, elevation differences and piping losses to allow verification that this will be a successful strategy.	<p>COMPLETE</p> <p>Item Closed During Onsite NRC Audit (Ref. 16).</p> <p>While on site the NRC staff reviewed calculation L-003961 "FLEX Pump Sizing Hydraulic Calculation," FSG-TP-00141, Test Procedure IP4000DIM-TCL Pump Performance, and walked down pump deployment locations and hose deployment routes. The licensee's calculation and pump performance test show that the licensee's planned FLEX pumps should have the capability to provide water to each designated location with the proper flow and pressure. The Staff had no further questions regarding the FLEX hydraulic analysis.</p> <p>Calc L-003961 has been provided on eportal.</p>

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Interim Staff Evaluation Open and Confirmatory Items		
Item Number	Description	Status
3.2.1.4.B	Confirm the generator sizing results consider appropriate electrical loads and adequate capacity of portable/FLEX electrical generators planned for use during Phase 2 and Phase 3.	<p>COMPLETE</p> <p>Item Closed During Onsite NRC Audit (Ref.16).</p> <p>While on site the NRC staff reviewed Design Consideration Summary (DCS) - EC 396069 Rev. 001: FLEX Primary Strategy - Electrical (sections 4.1.35 Electrical Requirements)</p> <p>Reviewed TODI: SEAG 14-000042 (FLEX Electrical Loads - FLEX Primary Strategy LaSalle NPS U2)</p> <p>Reviewed procedure LOA-FSG-002, Rev. 0: Flex Electrical Strategy</p> <p>Phase rotation checks are complete and cables are color coded.</p> <p>Licensee plans to cope with Phase 2 FLEX equipment. The licensee will utilize the Phase 3 480VAC FLEX DG if necessary. LaSalle does not plan to use the Phase 3 4160VAC FLEX DG.</p> <p>EC 396069 Rev. 001, TODI: SEAG 14-000042, and LOA-FSG-002 have been provided in eportal.</p>

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Interim Staff Evaluation Open and Confirmatory Items		
Item Number	Description	Status
3.2.2.A	Confirm completion of the evaluation of the SFP area for steam and condensation and implementation of a vent path strategy, if needed.	<p>COMPLETE</p> <p>Item Closed During Onsite NRC Audit (Ref. 16).</p> <p>While onsite the NRC staff reviewed the licensee's plan for deploying FLEX hoses to the SFP and walked down the SFP area. The licensee plans to deploy hoses for SFP cooling before the onset of bulk boiling. Ventilation procedure LOA-FSG-005 provides the requirements for implementation of the vent path strategy.</p> <p>LOA-FSG-005, "Area Ventilation" has been provided in eportal.</p>
3.2.4.1.A	Confirm that operation of RCIC with suction temperatures above 200°F is acceptable.	<p>COMPLETE</p> <p>Item Closed During Onsite NRC Audit (Ref. 16).</p> <p>The LaSalle RCIC system was evaluated in EC 399297 Rev. 000 for the conditions during an ELAP. As shown in the study, the RCIC system can remain functional for a minimum of 13 hours following a BDBEE.</p> <p>This accounts for the peak suppression pool maximum temperature of 234°F.</p> <p>EC 399297 Rev. 000 has been provided in eportal.</p>

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Interim Staff Evaluation Open and Confirmatory Items		
Item Number	Description	Status
3.2.4.2.A	Confirm that the licensee provides acceptable hydrogen gas ventilation.	<p>COMPLETE</p> <p>Item Closed During Onsite NRC Audit (Ref. 16).</p> <p>NRC performed walkdown of vital battery rooms (125 and 250), Div. 1 and Div. 2 switchgear rooms.</p> <p>NRC reviewed procedure: LOA-FSG-005, Rev. 0: Area Ventilation. Licensee will open doors and use forced ventilation.</p> <p>NRC reviewed calculation: VX-09, Rev. 12C, Battery Rooms Hydrogen Concentration, Hydrogen concentration less than 2% during ELAP.</p> <p>LOA-FSG-005 and Calc VX-09 Rev 12C have been provided in eportal.</p>

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Interim Staff Evaluation Open and Confirmatory Items		
Item Number	Description	Status
3.2.4.4.A	Confirm that the upgrades to the plant communication systems discussed in the licensee communications assessment (ADAMS Accession Nos. ML12306A199 and ML13056A135) in response to the March 12, 2012 50.54(f) request for information letter for Limerick (sic) and, as documented in the staff analysis (ADAMS Accession No. ML13114A067) have been completed.	<p>COMPLETE Item Closed During Onsite NRC Audit (Ref 16.)</p> <p>UPDATED LOA-FSG-010, "FLEX Communications," addresses the use of sound-powered phones and handheld radios in the talk-around mode. The total number of available radios has been increased to more than 70 radios ready for event response. 14 radios are stored in the FLEX 60'X90' protected building and the remainder are available to on-shift personnel. It was previously reported that 48 would be available, 10 with on-shift personnel and 38 stored in the FLEX 60'X90' protected building. Spare batteries are available (normal on-shift charging/storage plus additional batteries/charging in the 60'X90' FLEX building).</p>

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Interim Staff Evaluation Open and Confirmatory Items		
Item Number	Description	Status
		<p>Portable EDGs are available (stored in 60'X90' and 30'X40' protected FLEX buildings) to power the battery chargers. Spare fuel is provided for the portable EDGs as part of the FLEX equipment fueling plan (LOA-FSG-009).</p> <p>Sound-powered phone kits (headsets/extension cords) are stored in the Aux Bldg/Control Room Area as well as other designated / protected storage areas in the plant. Suggested patching sequences are captured in LOA-FSG-010 to enable communication between key operating areas.</p> <p>LOA-FSG-010 and LOA-FSG-009 have been provided in eportal.</p>

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Interim Staff Evaluation Open and Confirmatory Items		
Item Number	Description	Status
3.2.4.6.A	Confirm that the proceduralized "toolbox" approach can ensure vital area habitability and confirm the proper staging and protection of any equipment to implement this approach..	<p>COMPLETE</p> <p>Item Closed During Onsite NRC Audit (Ref. 16).</p> <p>The proceduralized toolbox approach was shown to maintain habitability of vital areas. Equipment used for maintaining habitability is properly staged and maintained through execution of FLEX PMs.</p> <p>See LOA-FSG-005, Area Ventilation and Calculation L-003968 Rev. 0 "Temperature & Humidity Transient In The Reactor Building 843'-6" Operating Floor Following a BDBEE For Flex."</p> <p>LOA-FSG-005 and Calc L-003968 have been provided in eportal.</p>

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Interim Staff Evaluation Open and Confirmatory Items		
Item Number	Description	Status
3.2.4.7.A	Confirm that the design of the FLEX pump suctions will prevent introducing excessive amounts of entrained debris as a result of extreme external hazards (e.g., suspended solids especially from high wind debris) in the cooling water from the Lake Screen House/Lake.	<p>COMPLETE</p> <p>Item Closed During Onsite NRC Audit (Ref. 16).</p> <p>The FLEX pump has 2 submersible pumps to supply the main pump suction, powered from the FLEX pump diesel; either can provide full flow capability. Both have ¼ inch perforated screen with 11.2 ft² free surface area. The main pump will be discharging through RHR LPCI directly inside the core shroud.</p> <p>Pumps will be available at 6 hrs, but do not plan to inject until RCIC fails. The water is from a man-made lake and suction is downstream of the chad screens. Additionally, the submersible pumps float at least 34 inches below the surface of the water and at least 10 inches above the bottom of the lake.</p>

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Interim Staff Evaluation Open and Confirmatory Items		
Item Number	Description	Status
3.2.4.10.A	Confirm that the high/low temperature analysis (i.e., temperatures above/below those currently assumed in the sizing calculations) shows no adverse effects on expected battery life.	<p>COMPLETE</p> <p>Item Closed During Onsite NRC Audit (Ref. 16).</p> <p>The NRC performed walkdown of vital battery rooms (125 and 250), Div.1 and Div. 2 switchgear room</p> <p>NRC reviewed procedure: LOA-FSG-005, Rev. 0: Area Ventilation</p> <p>NRC reviewed calculation: L-003969, Rev. 0: U1/U2 Transient Heat-Up Analysis for the Control Room, AEERs, Div. 1 and Div. 2 Switchgear Rooms following a BDBEE (opening doors in switchgear rooms and forced ventilation (fans), exhaust path through roof of the DG building).</p> <p>Calc L-003969 and LOA-FSG-005 are provided in eportal.</p>

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Interim Staff Evaluation Open and Confirmatory Items		
Item Number	Description	Status
3.4.A And 3.1.1.4.A	Confirm conformance to considerations 2 through 10 of NEI 12-06, Section 12.2 for the use of offsite resources or that an acceptable alternate is developed.	COMPLETE Item Closed During Onsite NRC Audit (Ref. 16). NRC's endorsement of the NEI white paper on this topic is ML14265A107. The SAFER Response Plan for LaSalle has been issued by SAFER and is documented in procedure CC-LA-118-1002. CC-LA-118-1002 has been provided in eportal.

7 Potential Draft Safety Evaluation Impacts

The changes related to the FLEX strategies described in this update have the potential to impact the pending Safety Evaluation.

8 References

The following references support the updates to the Overall Integrated Plan described in this enclosure.

1. LaSalle County Station's Overall Integrated Plan in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049), dated February 28, 2013 (ADAMS Accession No. ML13060A421).
2. NRC Order Number EA-12-049, "Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events," dated March 12, 2012.
2. Exelon/LaSalle Request for Relaxation from NRC Order EA-12-049, dated February 27, 2014 (ADAMS Accession No. ML14059A076).
4. NRC Approval of Exelon/LaSalle Request for Relaxation from NRC Order EA-12-049, dated April 15, 2014 (ADAMS Accession No. ML14071A455).
5. LaSalle County Station, Units 1 and 2 - Interim Staff Evaluation Relating to Overall Integrated Plan in Response to Order EA-12-049 (Mitigation Strategies), dated February 21, 2014 (ADAMS Accession No. ML14030A220).
6. NRC Order Number EA-13-109, "Order Modifying Licenses With Regard to Reliable Hardened Containment Vents Capable of Operation Under Severe Accident Conditions," dated June 6, 2013.

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7. LaSalle County Station, Units 1 and 2, First Six-Month Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049), dated August 28, 2013 (ADAMS Accession No. ML13241A283).
8. LaSalle County Station, Units 1 and 2 Second Six-Month Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049), dated February 28, 2014 (ADAMS Accession No. ML14059A431).
9. LaSalle County Station, Units 1 and 2, Third Six-Month Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049), dated August 28, 2014 (ADAMS Accession No. ML14248A239).
10. LaSalle County Station, Units 1 and 2, Fourth Six-Month Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049), dated February 27, 2015 (ADAMS Accession No. ML15061A424).
11. LaSalle County Station, Units 1 and 2, Fifth Six-Month Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049), dated August 28, 2015 (ADAMS Accession No. ML15240A308).
12. LaSalle County Station, Units 1 and 2, Sixth Six-Month Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049), dated February 26, 2016 (ADAMS Accession No. ML16057A217).
13. LaSalle County Station, Units 1 and 2, Seventh Six-Month Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049), dated August 26, 2016 (ADAMS Accession No. ML16239A323).
14. Exelon Generation Company, LLC Eighth Six-Month Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049), dated February 28, 2017 (RS-17-019).
15. Exelon Generation Company, LLC LaSalle County Station Unit 2, Report of Full Compliance with March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events (Order Number EA-12-049), dated April 4, 2017 (RS-17-040).
16. LaSalle County Station, Units 1 and 2 - Report for the Onsite Audit Regarding Implementation of Mitigation Strategies and Reliable Spent Fuel Pool Instrumentation Related to Orders EA-12-049 and EA-12-051 (TAC NOS. MF1119, MF1120, MF1121, and MF1122), dated March 23, 2015 (ADAMS Accession No. ML15061A054).
17. NEI Position Paper: Shutdown/Refueling Modes, dated September 18, 2013, (ADAMS Accession No. ML13273A514).

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18. NRC letter from Jack R. Davis, Director Mitigating Strategies Directorate, Office of Nuclear Reactor Regulation, to Joseph E. Pollack, Vice President Nuclear Operations, Nuclear Energy Institute, dated September 30, 2013 (ADAMS Accession No. ML13267A382).

9 Attachments

1. None.