

NRR-DMPSPeM Resource

From: Vaidya, Bhalchandra
Sent: Thursday, May 10, 2018 2:11 PM
To: Gullott, David M.:(GenCo-Nuc; Sprengel, Ryan:(GenCo-Nuc
Subject: LaSalle Units 1 and 2, EPID-L-2018-LLA-0012 -- REQUEST FOR ADDITIONAL INFORMATION (RAIS) - License Amendment Request for Temporary Extensions to Technical Specifications Supporting Maintenance on Portions of the Core Standby Cooling System

Subject: LaSalle Units 1 and 2-- License Amendment Request for Temporary Extensions to Technical Specifications Supporting Maintenance on Portions of the Core Standby Cooling System

EPID- L-2018-LLA-0012 (CAC NOS. 000976/05000373/ L-2018-LLA-0012, and 000976/05000374/ L-2018-LLA-0012)

Docket Nos. 50-373 and 50-374

David and Ryan,

By submittal dated January 24, 2018 (Agencywide Documents Access and Management System Accession No. ML18024A275), Exelon Generation Company, LLC (EGC), requests an amendment to Renewed Facility Operating License Nos. NPF-11 and NPF-18 for LaSalle County Station (LSCS), Units 1 and 2, respectively.

The proposed changes modify Technical Specifications (TSs) 3.7.2, "Diesel Generator Cooling Water (DGCW) System" 3.8.1, "AC Sources-Operating;" and the associated TS Bases. The proposed changes allow an extended period to install isolation valves to support replacing degraded Core Standby Cooling System piping.

The NRC staff has determined that a request for additional information (RAI) is necessary to complete its review regarding the requested amendment.

The NRC Staff's RAIs are provided below:

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REQUEST FOR ADDITIONAL INFORMATION
BY THE OFFICE OF NUCLEAR REACTOR REGULATION
PROPOSED LICENSE AMENDMENT REQUEST
LASALLE COUNTY STATIONS UNITS 1 AND 2
DOCKET NOS. 50-373 and 50-374
EPID Number L-2018-LLA-0012

By application dated January 24, 2018 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML18024A275), Exelon Generation Company, LLC (EGC), the licensee requested an amendment to Renewed Facility Operating License Nos. NPF-11 and NPF-18 for LaSalle County Station (LSCS), Units 1 and 2, respectively. The license amendment request (LAR) is related to temporary extensions to technical specification's supporting maintenance on portions of the core standby cooling system. The proposed changes modify Technical Specifications (TSs) 3.7.2, "Diesel Generator Cooling Water (DGCW) System," 3.8.1, "AC Sources-Operating" and the associated TS Bases. The proposed changes allow an extended period to install isolation valves to support replacing degraded Core Standby Cooling System piping.

The NRC staff has reviewed the information provided by the licensee in the LAR. The EEOB staff used the applicable regulatory requirements to review the LAR and needs additional information to complete the review of the LAR.

Applicable Regulatory Requirements

General Design Criterion (GDC) 17, "Electric power systems," of Appendix A, "General Design Criteria for Nuclear Power Plants," to Title 10 of the *Code of Federal Regulations* (10 CFR) Part 50, states in part:

An onsite electric power system and an offsite electric power system shall be provided to permit functioning of structures, systems, and components important to safety. The safety function for each system (assuming the other system is not functioning) shall be to provide sufficient capacity and capability to assure that (1) specified acceptable fuel design limits and design conditions of the reactor coolant pressure boundary are not exceeded as a result of anticipated operational occurrences and (2) the core is cooled and containment integrity and other vital functions are maintained in the event of postulated accidents.

10 CFR Part 50.36 "Technical specifications," establish the requirements related to the content of the TSs. Section 50.36(c)(2)(ii) states:

Limiting conditions for operation. Limiting conditions for operation are the lowest functional capability or performance levels of equipment required for safe operation of the facility. When a limiting condition for operation of a nuclear reactor is not met, the licensee shall shut down the reactor or follow any remedial action permitted by the technical specifications until the condition can be met.

EEOB-RAI 1

The proposed TS changes will allow an extended 7 day limiting condition of operation (LCO) to install isolation valves to support replacing degraded Core Standby Cooling System (CSCS) piping. The CSCS provides cooling water to the associated Diesel Generators (DGs) in each safety related division required for safe shutdown of the plant. A portion of the DG cooling water (DGCW) system is being replaced and requires installation of isolation valves. Simplified sketches (Figures 1-4) of the LAR depict the proposed changes to the CSCS piping and valves. The staff notes that room coolers, not associated with DG operation but supplied by DG Cooling Water (DGCW) pumps, are indicated as inoperable and unavailable and the discharge lines (to be replaced) from room coolers have an isolation valve. The discharge line from DG Cooler 0A is depicted going straight to the common header and the discharge line from DG cooler 1A and 2A is connecting to the discharge line from the RHR heat exchangers which connects to the common header.

The LAR states that the proposed changes have no effect on the design of the CSCS and DGs. The LAR further states "In the periods of applicability, the Division 2 DGCW systems and the Division 2 DGs on both units will be available and capable of performing the design functions. No maintenance will be performed on the Division 2 DGs during the periods of applicability." In view of the planned work being performed on portions of the system that are also supplied by the DGCW pumps and a non-code valve will be installed on the discharge side of DG cooling system, please provide a discussion on operational steps and capability of the DG(s) to perform the design functions based on the following conditions:

- a) At the time when the degraded line has to be isolated for replacement, the DGCW system pumps and coolers will not be secured.
- b) A postulated failure of the temporary non-code stopple valve will not degrade the performance capabilities of the associated DG cooling system if the available DGs are required to power safety-related loads.

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Subsequent to the discussion with your staff on May 10, 2018, you have provided the confirmed date of response as COB June 11, 2018.

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

If you have any questions, please contact me at (301) 415-3308.

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Hearing Identifier: NRR_DMPS
Email Number: 365

Mail Envelope Properties (BN7PR09MB2642260F63620D7300877F538D980)

Subject: LaSalle Units 1 and 2, EPID-L-2018-LLA-0012 -- REQUEST FOR ADDITIONAL INFORMATION (RAIS) - License Amendment Request for Temporary Extensions to Technical Specifications Supporting Maintenance on Portions of the Core Standby Cooling System

Sent Date: 5/10/2018 2:11:04 PM

Received Date: 5/10/2018 2:11:00 PM

From: Vaidya, Bhalchandra

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Tracking Status: None

Post Office: BN7PR09MB2642.namprd09.prod.outlook.com

Files	Size	Date & Time
MESSAGE	6796	5/10/2018 2:11:00 PM

Options

Priority: Standard

Return Notification: No

Reply Requested: No

Sensitivity: Normal

Expiration Date:

Recipients Received: