

RS-18-071

10 CFR 50.90

June 11, 2018

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

LaSalle County Station, Units 1 and 2
Renewed Facility Operating License Nos. NPF-11 and NPF-18
NRC Docket Nos. 50-373 and 50-374

Subject: Response to Request for Additional Information Regarding License Amendment Request for Temporary Extensions to Technical Specifications Supporting Maintenance on Portions of the Core Standby Cooling System

References:

1. Letter from David M. Gullott (Exelon Generation Company, LLC) to U.S. NRC, "License Amendment Request for Temporary Extensions to Technical Specifications Supporting Maintenance on Portions of the Core Standby Cooling System," dated January 24, 2018
2. Email from B. Vaidya (U.S. NRC) to R. Sprengel (Exelon Generation Company, LLC), "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," dated May 10, 2018

In Reference 1, Exelon Generation Company, LLC (EGC) requested an amendment to Renewed Facility Operating License Nos. NPF-11 And NPF-18 for LaSalle County Station (LSCS), Units 1 and 2, respectively. In Reference 2, the NRC requested that EGC provide additional information to support their review of the subject License Amendment Request. As noted in Reference 2, a response was requested within 30 days, by June 11, 2018. The requested information is provided in Attachment 1.

EGC has reviewed the information supporting the No Significant Hazards Consideration and the Environmental Consideration that was previously provided to the NRC in Reference 1. The additional information provided in this submittal does not affect the conclusion that the proposed license amendment does not involve a significant hazards consideration. This additional information also does not affect the conclusion that neither an environmental impact statement nor an environmental assessment need be prepared in support of the proposed amendment.

In accordance with 10 CFR 50.91, "Notice for public comment; State consultation," paragraph (b), EGC is notifying the State of Illinois of this additional information by transmitting a copy of this letter and its attachment to the designated State Official.

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There are no regulatory commitments contained in this letter. Should you have any questions concerning this letter, please contact Ryan M. Sprengel at (630) 657-2814.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 11th day of June 2018.

Respectfully,

A handwritten signature in black ink, appearing to read 'D. Gullott', with a long horizontal line extending to the right.

David M. Gullott
Manager – Licensing
Exelon Generation Company, LLC

Attachment 1: Response to Request for Additional Information

cc: Regional Administrator – NRC Region III
NRC Senior Resident Inspector – LaSalle County Station
Illinois Emergency Management Agency

ATTACHMENT 1

Response to Request for Additional Information

In Reference 1, Exelon Generation Company, LLC (EGC) requested an amendment to Renewed Facility Operating License Nos. NPF-11 And NPF-18 for LaSalle County Station (LSCS), Units 1 and 2, respectively. In Reference 2, the NRC requested that EGC provide additional information to support their review of the subject License Amendment Request. As noted in Reference 2, a response was requested within 30 days, by June 11, 2018. The requested information is provided below.

Request for Additional Information

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.*

Response

- a) At the time when the degraded line has to be isolated for replacement, the DGCW system pumps and coolers will not be secured.*

Operational Steps

The first steps require installation of a saddle and flange on existing piping for mounting the line stop machine. The work will not breach the system pressure boundary and will be completed at a time prior to the refueling outage in accordance with current Technical Specifications. The affected Diesel Generator Cooling Water pump (DG CWP) will remain operable during this time. System preparations for installation of the isolation valve will require placement of clearance order boundaries that will isolate the ECCS room coolers in the affected division from the CWP

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and the associated cooling water return lines from the cooler. The installed line stop will be the downstream isolation that will isolate the section of piping to be replaced. During all phases of the work requiring entry into the proposed Technical Specifications the DG CWP for the affected Division will remain un-isolated and available to support any start of the affected Diesel Generator. The existing isolation valves for the cooling water inlet of the affected ECCS room coolers have been added to the supporting figures in Attachment 2 of RS-18-009 for clarification of available isolations.

Capability of DG during the installation of the stopple.

The affected Diesel Generators will be capable of performing their design function during the entire time that the amended tech specs are invoked. The only portion of the DG cooling water system that will be unavailable is the ECCS room cooler and piping for the affected division on the outage unit. All portions of the DG cooling water system on the operating unit will remain available. The DG cooling water system that supports the Diesel generators will remain intact and available to provide cooling water to the DG Coolers. The flow path for the cooling water through the DG coolers is separate from the piping associated with the ECCS room coolers and is routed to the return header downstream of the return from the ECCS room coolers. The DG cooling water system in the unaffected redundant Division 1 or 2 for both the outage and online units will remain operable and available.

- 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.*

Operational steps

The integrity of the non-code mechanical line stops will be leak tested prior to cutting the existing piping systems. Leakage control materials will be pre-staged at each valve location in the unlikely event the mechanical line stops were to begin leaking during maintenance evolutions while the line is breeched. Implementation of leakage control measures can be accomplished since the maximum operating pressure at the location of CSCS valve replacement is estimated to be less than 16 psig. In addition, each area/room where the new valves are scheduled to be replaced will be verified to have operable sump pump(s) during the time that the line stop is installed.

Work will commence around the clock until the code isolation is restored; therefore, any leakage will be apparent and addressed in a timely manner. Any leakage that is incurred will be on the outage unit and will not be exposed to LOCA conditions on the operating unit; thereby, allowing access for compensatory actions should leakage from the line stop occur. Emergency response procedures that address flooding in the reactor building allow continued use of the affected DG CWP as needed to support emergency response procedure actions.

Capability of DG during the installation of the stopple

The DG CWP will continue to supply the DG coolers without limitation as the leakage is downstream of the DG Cooler in return lines going to the lake. The mechanical line stop machine is designed to meet or exceed the same pressure requirements for the current system and will be seismically mounted. Significant leakage is not anticipated as the mechanical line stop is installed in an open-ended return line with a maximum estimated pressure of 16 psig. In the event that the machine begins to leak, the leakage is anticipated to be minor and will be contained on the outage unit in the affected corner room or reactor building raceway. None of

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the leakage would be in the rooms that would affect the DG CWP or DG; therefore, the DG CWP will continue operation and supply cooling water to the affected DG.

The non-code mechanical line stops for the installation of the additional new ECCS cooler discharge valves (one per outage) will be located in the respective units' RHR B/C Room or in the Reactor Building raceway areas with a floor elevation of 673' 4". The areas are flood protected from the Divisional ECCS rooms by watertight floodwalls to an elevation of 686' 7". These areas also have water level alarms and duplex sump pumps. These areas have approximately 1000 cu ft and 4800 cu ft of unoccupied space per foot of elevation, respectively. In the unlikely event that flooding were to occur, this available flood protected volume provides adequate time for the implementation of compensatory actions and ensures potential flooding does not impact redundant equipment in surrounding areas.

These design features, compensatory actions, and the inherent robust design of the mechanical line stops are considered adequate to ensure that flooding does not occur that could impact redundant Systems Structures and Components during the planned CSCS valve installation.

References

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