

RS-18-078

10 CFR 50.90

June 18, 2018

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555-0001LaSalle 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: Supplemental Information Related to Application to Revise Technical Specifications to Adopt TSTF-542, "Reactor Pressure Vessel Water Inventory Control"

- References:
1. Letter from P. R. Simpson (Exelon Generation Company, LLC (EGC)) to NRC, "Application to Revise Technical Specifications to Adopt TSTF-542, 'Reactor Pressure Vessel Water Inventory Control,'" dated December 13, 2017
 2. Email from B. K. Vaidya (NRC) to D. M. Gullott (EGC), "LaSalle Units 1 and 2, EPID-L-2017-LLA-0415 - - Request for Additional Information (RAIs) – License Amendment Request (LAR) to Adopt TSTF-542," dated June 12, 2018

In Reference 1, EGC submitted a request for amendments to the Technical Specifications (TS) for LaSalle County Station (LSCS), Units 1 and 2. In Reference 2, the NRC determined that additional information was required to complete its evaluation of the Reference 1 request. The requested information is provided in Attachment 1. Additionally, in Reference 2, the NRC identified two typographical issues associated with the Technical Specifications (TS) changes provided in Reference 1. The identified issues are addressed through the resubmission of the affected TS markups and revised pages in Attachments 2 and 3, respectively.

EGC has reviewed the information supporting a finding of no significant hazards consideration, and the environmental consideration, that were previously provided to the NRC in Reference 1. The additional information provided in this submittal does not affect the bases for concluding that the proposed license amendments do not involve a significant hazards consideration. In addition, the information provided in this submittal does not affect the bases for concluding that neither an environmental impact statement nor an environmental assessment needs to be prepared in connection with the proposed amendments.

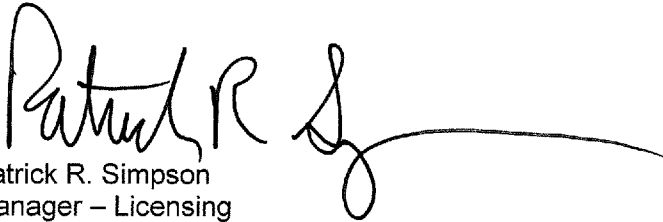
EGC is notifying the State of Illinois of this supplement to a previous application for a change to the TS by sending a copy of this letter and its attachment to the designated State Official in accordance with 10 CFR 50.91, "Notice for public comment; State consultation," paragraph (b).

Approval of the proposed amendments continues to be requested by December 13, 2018. Once approved, the amendments will be implemented for LSCS, Units 1 and 2 prior to initial entry into Mode 4 during the LSCS, Unit 2 refuel outage in 2019 (i.e., L2R17), which is currently scheduled to occur in February 2019.

There are no regulatory commitments contained within this letter. Should you have any questions concerning this letter, please contact Mr. Mitchel A. Mathews at (630) 657-2819.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 18th day of June 2018.

Respectfully,

A handwritten signature in black ink, appearing to read "Patrick R. Simpson", with a long horizontal flourish extending to the right.

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

- Attachments:
1. Supplemental Information Related to Application to Revise Technical Specifications to Adopt TSTF-542, "Reactor Pressure Vessel Water Inventory Control"
 2. Revised Technical Specifications Page Changes (Mark-Ups)
 3. Revised Technical Specifications Pages

cc: NRC Regional Administrator, Region III
NRC Senior Resident Inspector – LaSalle County Station
Illinois Emergency Management Agency – Division of Nuclear Safety

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

ATTACHMENT 1

**SUPPLEMENTAL INFORMATION RELATED TO APPLICATION TO REVISE TECHNICAL
SPECIFICATIONS TO ADOPT TSTF-542, "REACTOR PRESSURE VESSEL WATER
INVENTORY CONTROL"**

**ATTACHMENT 1 –
SUPPLEMENTAL INFORMATION RELATED TO APPLICATION TO REVISE TECHNICAL
SPECIFICATIONS TO ADOPT TSTF-542, "REACTOR PRESSURE VESSEL WATER
INVENTORY CONTROL"**

REQUEST FOR ADDITIONAL INFORMATION
APPLICATION TO REVISE TECHNICAL SPECIFICATION TO ADOPT TSTF-542
REVISION 2, "REACTOR PRESSURE VESSEL WATER INVENTORY CONTROL"
EXELON GENERATION COMPANY (LLC)
LASALLE COUNTY STATION
(DOCKET NOS. 50-373 and 50-374) (EPID: L-2017-LLA-0415)

By application dated December 13, 2017 (Agencywide Documents Access and Management System Accession No. ML ML17360A159), 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) to adopt TSTF-542.

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

EICB-RAI-1

Background:

In Attachment 2 of the LAR, on page 3.3.5.2-3, proposed LSCS TS Table 3.3.5.2-1, Function 1.a, "Low Pressure Coolant Injection-A (LPCI) and Low Pressure Core Spray (LPCS) Subsystems, and Function 2.a, "LPCI-B and LPCI-C Subsystem," Reactor Steam Dome Pressure – Low (Injection Permissive)," are not consistent with TSTF-542.

For Modes 4 and 5, the equivalent function in TSTF-542 standard technical specifications (STS) Table 3.3.5.2-1 retains the same requirement for channels per function (three) as found in STS Table 3.3.5.1-1. However, LSCS proposed to reduce the channels per function from two in current LSCS TS table 3.3.5.1-1 (Functions 1.d and 2.d) to one in proposed Table 3.3.5.2-1. This difference was not identified as a variation in Section 2.2 of Attachment 1 of the LAR.

Question:

Please provide technical justification for the proposed required channels per function for Functions 1.a and 2.a in LSCS TS Table 3.3.5.2-1.

Exelon Generation Company, LLC (EGC) Response

In Attachment 2 of EGC's December 13, 2017, request to adopt Technical Specifications Task Force (TSTF) Traveler TSTF-542, EGC indicated in the proposed LaSalle County Station (LSCS), Units 1 and 2 Technical Specifications (TS), that for Table 3.3.5.2-1 Functions 1.a and 2.a, "Reactor Steam Dome Pressure Low (Injection Permissive)," only one channel is needed. This applied to the required Low Pressure Coolant Injection-A (LPCI) and Low Pressure Core Spray (LPCS) Subsystems, and required LPCI B and LPCI C Subsystems, respectively. This proposal is related to bracketed values in the markup of the Standard Technical Specifications pages provided in TSTF-542; therefore, EGC did not initially consider this a variation. However,

**ATTACHMENT 1 –
SUPPLEMENTAL INFORMATION RELATED TO APPLICATION TO REVISE TECHNICAL
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the following explanation provides additional clarity to aid the NRC in its review of the EGC proposal. Specifically, the instruments associated with TS Table 3.3.5.2-1, Functions 1.a and 2.a are installed in a parallel configuration, so only one of the two channels for these functions is required to satisfy the logic and provide the permissive for the associated subsystem. Moreover, if the required channel is found to be inoperable, Limiting Condition for Operation 3.3.5.2, "RPV Water Inventory Control Instrumentation," Condition C applies. Required Action C.1, requires the channel to be placed in trip within one hour, which will allow manual operation of the associated subsystem. Therefore, for manual operation of a required subsystems in Modes 4 and 5 as proposed, only one instrument channel is needed for Table 3.3.5.2-1, Functions 1.a and 2.a.

Additional Corrections:

The NRC staff noted that the following corrections are needed to the TS Mark-up Pages submitted in the Application:

1. *Attachment 2 of the License Amendment Request (LAR), markup page 3.5.2-1, Required Action B.1*

As proposed: B.1 Initiate action to establish a method of water injection capable of operating without offsite power.

'Electrical' is missing between offsite and power

2. *Attachment 2 of the LAR, markup page 3.5.2-2, Condition C is missing period.*

EGC Response

Updated TS Page Changes (i.e., markups) and the corresponding revised TS Pages (i.e., clean pages) that address the identified issues have been included as Attachments 2 and 3, respectively.

LaSalle County Station, Units 1 and 2

**Supplemental Information Related to Application to Revise Technical Specifications to
Adopt TSTF-542, "Reactor Pressure Vessel Water Inventory Control"**

ATTACHMENT 2

REVISED TECHNICAL SPECIFICATIONS PAGE CHANGES (MARK-UPS)

3.5.2-1

3.5.2-2

3.5 EMERGENCY CORE COOLING SYSTEMS (ECCS), ~~REACTOR PRESSURE VESSEL (RPV) WATER INVENTORY CONTROL~~, AND REACTOR CORE ISOLATION COOLING (RCIC) SYSTEM

3.5.2 ~~RPV Water Inventory Control/ECCS Shutdown~~

LCO 3.5.2 *DRAIN TIME of RPV water inventory to the top of active fuel (TAF) shall be ≥ 36 hours.*

AND

~~One Two~~ ECCS injection/spray subsystems shall be OPERABLE.

-----NOTE-----
~~One A~~ *Low Pressure Coolant Injection (LPCI) subsystem may be considered OPERABLE during alignment and operation for decay heat removal, if capable of being manually realigned and not otherwise inoperable.*

APPLICABILITY: MODES 4 ~~and~~,
~~MODE 5 except with the spent fuel storage pool gates removed and water level ≥ 22 ft over the top of the reactor pressure vessel flange.~~

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One r Required ECCS injection/spray subsystem inoperable.	A.1 Restore required ECCS injection/spray subsystem to OPERABLE status.	4 hours
B. Required Action and associated Completion Time of Condition A not met.	B.1 Initiate action to suspend operations with a potential for draining the reactor vessel (OPDRVs) <i>establish a method of water injection capable of operating without offsite electrical power.</i>	Immediately

(continued)

ACTIONS *(continued)*

CONDITION	REQUIRED ACTION	COMPLETION TIME
C. Two required ECCS injection/spray subsystems inoperable.	C.1 Initiate action to suspend OPDRVs. <u>AND</u> C.2 Restore one required ECCS injection/spray subsystem to OPERABLE status.	Immediately 4 hours
C. DRAIN TIME < 36 hours and ≥ 8 hours.	C.1 Verify secondary containment boundary is capable of being established in less than the DRAIN TIME. <u>AND</u> C.2 Verify each secondary containment penetration flow path is capable of being isolated in less than the DRAIN TIME. <u>AND</u> C.3 Verify one standby gas treatment subsystem is capable of being placed in operation in less than the DRAIN TIME.	4 hours 4 hours 4 hours

(continued)

LaSalle County Station, Units 1 and 2

**Supplemental Information Related to Application to Revise Technical Specifications to
Adopt TSTF-542, "Reactor Pressure Vessel Water Inventory Control"**

ATTACHMENT 3

REVISED TECHNICAL SPECIFICATIONS PAGES

3.5.2-1

3.5.2-2

3.5 EMERGENCY CORE COOLING SYSTEMS (ECCS), REACTOR PRESSURE VESSEL (RPV) WATER INVENTORY CONTROL, AND REACTOR CORE ISOLATION COOLING (RCIC) SYSTEM

3.5.2 RPV Water Inventory Control

LC0 3.5.2 DRAIN TIME of RPV water inventory to the top of active fuel (TAF) shall be \geq 36 hours.

AND

One ECCS injection/spray subsystem shall be OPERABLE.

-----NOTE-----
A Low Pressure Coolant Injection (LPCI) subsystem may be considered OPERABLE during alignment and operation for decay heat removal, if capable of being manually realigned and not otherwise inoperable.

APPLICABILITY: MODES 4 and 5.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. Required ECCS injection/spray subsystem inoperable.	A.1 Restore required ECCS injection/spray subsystem to OPERABLE status.	4 hours
B. Required Action and associated Completion Time of Condition A not met.	B.1 Initiate action to establish a method of water injection capable of operating without offsite electrical power.	Immediately

(continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
C. DRAIN TIME < 36 hours and ≥ 8 hours.	C.1 Verify secondary containment boundary is capable of being established in less than the DRAIN TIME.	4 hours
	<u>AND</u>	
	C.2 Verify each secondary containment penetration flow path is capable of being isolated in less than the DRAIN TIME.	4 hours
	<u>AND</u>	
	C.3 Verify one standby gas treatment subsystem is capable of being placed in operation in less than the DRAIN TIME.	4 hours

(continued)