

NRR-DMPSPeM Resource

From: Vaidya, Bhalchandra
Sent: Thursday, May 31, 2018 7:19 AM
To: david.gullott@exeloncorp.com; Sprengel, Ryan:(GenCo-Nuc)
Subject: LaSalle Units 1 and 2, EPID-L-2018-LLA-0035 -- DRAFT REQUEST FOR ADDITIONAL INFORMATION (RAIS) - License Amendment Request to adopt TSTF-334-A

Subject: LaSalle County Station, Units 1 and 2 - Application to Revise Technical Specifications to Adopt TSTF-334-A, "Relaxed Surveillance Frequency for Excess Flow Check Valve Testing."

EPID- L-2018-LLA-0035 (CAC NOS. 000976/05000373/ L-2018-LLA-0035, and 000976/05000374/ L-2018-LLA-0035)

Docket Nos. 50-373 and 50-374

David and Ryan,

By application dated February 7, 2018 (Agencywide Documents Access and Management System Accession No. ML18039A123), 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-334-A, "Relaxed Surveillance Frequency for Excess Flow Check Valve Testing." Specifically, the proposed changes would revise surveillance requirement (SR) 3.6.1.3.8 in LSCS Technical Specifications (TS) 3.6.1.3, "Primary Containment Isolation Valves."

The NRC staff has determined that additional information is necessary to complete its review regarding the requested amendment.

The NRC Staff's DRAFT request for additional information (RAIs) are provided below:

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DRAFT 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 February 7, 2018 (Agencywide Documents Access and Management System Accession No. ML18039A123), 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.

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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 the LAR, the licensee requested to revise the number of EFCVs tested by TS SR 3.6.1.3.8 from "each" to a "representative sample," in accordance with the Surveillance Frequency Control program (SFCP). The representative sample is based on approximately 20 percent of the reactor instrumentation line EFCVs. Currently, each EFCV of the LSCS is required to be tested on a 24-month frequency for SR 3.6.1.3.8. Therefore, approximately 20 percent of the reactor instrumentation line EFCVs would be tested every operating cycle, thus, each EFCV would be tested at least one every 10 years (nominal) - or once every 5 refueling cycles. Based on the criteria of Title 10 of the *Code of Federal*

Regulations (10 CFR), Paragraph 50.34(f)(2)(iv) and (xiv) and Regulatory Guide 1.11, "Instrument Lines Penetrating Primary Reactor Containment," the NRC staff evaluates how licensees ensure the reliability and safety of the systems that indicate the open/closed status of EFCVs during the 10-year surveillance period when the EFCV is not being exercised. Regulatory Guide 1.11 states: "It is desirable to have valve status (opened or closed indicated in the control room) because without such an indication, a valve may be closed and the effectiveness of the instrument impaired for long periods of time." TSTF-334-A does not address the reliability of the valve open-close status indication, nor was there any data regarding the operating experience data associated with the open-close status indication system. However, changing the surveillance frequency (SR frequency) of the valve to once every ten years without continuing to test the status indication system does not appear to be a conservative action, unless there is also an evaluation of the operating experience for the open-close status indication equipment which indicates that the indication equipment is at least as reliable as the EFCV performance.

Within the LAR, the licensee has referenced NEDO-32977-A, "Excess Flow Check Valve Testing Relaxation," which includes an evaluation of past operating experience regarding the ability of the EFCVs to check process flow to within acceptable limits, for EFCVs of various manufacturers installed at a number of BWR facilities, when they are tested (and thereby exercised) at intervals not in excess of 24 months. Table 4-1 of NEDO-32977-A (which does not include data from LSCS operating experience) indicates that a composite failure rate for all non-LSCS EFCVs is approximately between 1.0E-07 to 2.0E-07. Table 4-2 indicates an "Upper Limit Failure Rate" of approximately 3.0E-7 for the Dragon EFCVs (which are the same type of EFCV used at LaSalle), when the valves are tested on intervals not exceeding 24 months. However, the report does not discuss the reliability of the EFCV open/closed status indication system over either a 24-month surveillance interval or an interval greater than 24 months.

Question (RAI):

Please provide a description of the overall reliability of the EFCV status indication system (e.g., position switches, indicating lights in the control room) that would enable the ability of plant operators to readily identify whether a EFCV has actuated or closed, which could impair the effectiveness of downstream instruments for significant periods of time. Describe the basis for concluding that a surveillance test which exercises the EFCV valve position switch once per 10 years is considered sufficient to confirm reliable operation of the position indication system, or provide a description of any alternate means by which a plant operator can readily identify whether an EFCV has closed, thus impairing the effectiveness of the instruments downstream of the valve.

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Please contact me to schedule a telephone conference to ensure that the licensee clearly understands the staff concerns and also to ascertain when the licensee will respond to these RAIs.

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

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