NRR-DMPSPEm Resource

From: Vaidya, Bhalchandra
Sent: Tuesday, March 5, 2019 8:15 AM
To: Sprengel, Ryan:(GenCo-Nuc); david.gullott@exeloncorp.com
Subject: RE: RE: LaSalle 1 and 2, EPID-L-2018-LLR-0162, LAR RE: Removal of Operating Mode Restrictions for Performing Surveillance Testing of the Div 3 Battery and HPCS DG, ADDITIONAL DRAFT Request for Additional Information (RAI)

Ryan and David,

The Revised Draft RAI-3 providing the regulatory basis and more specific request, is provided below:

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ADDITIONAL DRAFT REQUEST FOR ADDITIONAL INFORMATION
LICENSE AMENDMENT REQUEST TO REVISE THE TECHNICAL SPECIFICATIONS TO
3.8.4 AND 3.8.6 TO REMOVE MODE RESTRICTIONS FROM TECHNICAL SPECIFICATIONS SURVEILLANCE REQUIREMENTS
DOCKET NOS. 50-373 AND 50-374
(EPID NO. L-2018-LLA-0162)

By application dated April 19, 2018 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML18157A123), Exelon Generation Corporation, LLC (the licensee), requested an amendment to the Renewed Facility Operating License Nos. NPF-11 and NPF-18 for LaSalle County Station Units 1 and 2 respectively. The proposed amendment would revise Technical Specifications (TS) 3.8.1, “AC Sources-Operating," and TS 3.8.4, "DC Sources-Operating." Specifically, the proposed changes would remove operating Mode restrictions for performance of TS Surveillance Requirements pertaining to the Division 3 battery and high pressure core spray diesel generator. To complete its review, the U.S. Nuclear Regulatory Commission (NRC) staff requests a response to the questions below.

Request Additional Information (RAI) 3

Section 8.3.1, “AC Power Systems (Onsite),” of NUREG-0800, “Standard Review Plan for the Review of Safety Analysis Reports for Nuclear Power Plants: LWR Edition – Electric Power,” states, in part, that in reviewing the mode of operation where both power systems are being operated in parallel, the interlock scheme, including electrical protective relay coordination and settings, is closely examined to verify that the independence of the necessary redundant portions of the onsite power system is established upon a failure in the offsite power system. The event of concern under this mode of operation is an accident concurrent with a LOOP and a single failure preventing the opening of the feeder-isolation breaker through which the paralleling of the power systems was being accomplished. Because the signal to start the diesel generator sets is normally derived from undervoltage relays, and under this situation the voltage is maintained above the trip relay settings by the diesel generator under test, the remaining redundant diesel generators will not be commanded to start running. Consequently, the added capacity resulting from the connection of non-safety-related loads to the diesel generator under test will cause the tripping of this diesel due to overload or under-frequency. The end result could be the total loss of power to the safety buses.

Subsection 3.2.1, “General Basis,” of the LAR states, in part, that the effect on safety of performing the subject SRs for the Division 3 DG during plant operation is not significantly different than the effect on safety associated with the performance of other DG surveillances required by the TS that are not prohibited from being performed during plant operation. For example, SRs 3.8.1.9, 3.8.1.10, and 3.8.1.17 are performed by paralleling the DG in test with offsite power, similar to the existing monthly run of the DG, which is conducted with the plant online.

It is not clear, during the online load rejection testing of the Division 3 DG, in which the DG is paralleled to the offsite power, what the impact is to the safety buses if an event of loss of offsite power (LOOP), with or without LOCA, occurs.

Please provide a discussion of how the Division 3 DG and its associated equipment, during the online load rejection testing, respond to a LOOP and/or LOCA signal and the impact of the equipment responses to the safety buses.

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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.

Bhalchandra K. Vaidya
Licensing Project Manager
NRC/NRR/DORL/LPL3

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From: Sprengel, Ryan:(GenCo-Nuc) [mailto:Ryan.Sprengel@exeloncorp.com]
Sent: Friday, February 22, 2019 3:45 PM
To: Vaidya, Bhalchandra <Bhalchandra.Vaidya@nrc.gov>
Subject: [External_Sender] RE: LaSalle 1 and 2, EPID-L-2018-LLR-0162, LAR RE: Removal of Operating Mode Restrictions for Performing Surveillance Testing of the Div 3 Battery and HPCS DG, ADDITIONAL DRAFT Request for Additional Information (RAI)

Bhalchandra,

I have a question prior to reaching out to the site, can you clarify one portion? The question seems to ask what the impact to offsite power is if there is a loss of offsite power. Is there something missing in the question or should one of these not be offsite power?

Ryan Sprengel
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Sr. Regulatory Engineer, Corporate Licensing
Generation Nation Site Champion
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From: Vaidya, Bhalchandra <Bhalchandra.Vaidya@nrc.gov>
Sent: Friday, February 22, 2019 2:17 PM
To: Gullott, David M.:(GenCo-Nuc) <David.Gullott@exeloncorp.com>; Sprengel, Ryan:(GenCo-Nuc) <Ryan.Sprengel@exeloncorp.com>
Subject: [EXTERNAL] LaSalle 1 and 2, EPID-L-2018-LLR-0162, LAR RE: Removal of Operating Mode Restrictions for Performing Surveillance Testing of the Div 3 Battery and HPCS DG, ADDITIONAL DRAFT Request for Additional Information (RAI)

Subject: LaSalle County Station, Units 1 and 2 - License Amendment Request to Remove Operating Mode Restrictions for Performing Surveillance Testing of the Division 3 Battery and High Pressure Core Spray Diesel Generator.

EPID- L-2018-LLA-0162 (CAC NOS. 000976/05000373/ L-2018-LLA-0162, and 000976/05000374/ L-2018-LLA-0162)

Docket Nos. 50-373 and 50-374

David and Ryan,

By application dated April 19, 2018 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML18157A123), 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 the changes to Technical Specifications to Remove Operating Mode Restrictions for Performing Surveillance Testing of the Division 3 Battery and High Pressure Core Spray Diesel Generator.

Subsequent to the clarification call on February 13, 2019, the NRC staff has determined that some additional information is necessary to complete its review regarding the requested amendment.

The NRC Staff's DRAFT request for this additional information (RAIs) are provided below:
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ADDITIONAL DRAFT REQUEST FOR ADDITIONAL INFORMATION
LICENSE AMENDMENT REQUEST TO REVISE THE TECHNICAL SPECIFICATIONS TO
3.8.4 AND 3.8.6 TO REMOVE MODE RESTRICTIONS FROM TECHNICAL SPECIFICATIONS SURVEILLANCE REQUIREMENTS
DOCKET NOS. 50-373 AND 50-374
(EPID NO. L-2018-LLA-0162)

By application dated April 19, 2018 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML18157A123), Exelon Generation Corporation, LLC (the licensee), requested an amendment to the Renewed Facility Operating License Nos. NPF-11 and NPF-18 for LaSalle County Station Units 1 and 2 respectively. The proposed amendment would revise Technical Specifications (TS) 3.8.1, “AC Sources-Operating," and TS 3.8.4, "DC Sources-Operating." Specifically, the proposed changes would remove operating Mode restrictions for performance of TS Surveillance Requirements pertaining to the Division 3 battery and high pressure core spray diesel generator. To complete its review, the U.S. Nuclear Regulatory Commission (NRC) staff requests a response to the questions below.

Request Additional Information (RAI) 3

Subsection 3.2.1, “General Basis,” of the LAR states, in part, that the effect on safety of performing the subject SRs for the Division 3 DG during plant operation is not significantly different than the effect on safety associated with the performance of other DG surveillances required by the TS that are not prohibited from being performed during plant operation. For example, SRs 3.8.1.9, 3.8.1.10, and 3.8.1.17 are performed by paralleling the DG in test with offsite power, similar to the existing monthly run of the DG, which is conducted with the plant online.

It is not clear, during the online load rejection testing of the Division 3 DG in which the DG is paralleled to the offsite power, what the impact is to the offsite power and the safety buses if either an event of loss of offsite power (LOOP), with or without LOCA, occurs.

Please provide a discussion of how the Division 3 DG and its associated equipment respond to a LOOP and/or LOCA signal during the online load rejection testing and the impact of this test concurrent with a LOOP and/or LOCA signal.

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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.

Bhalchandra K. Vaidya
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Hearing Identifier: NRR_DMPS
Email Number: 844

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Subject: RE: RE: LaSalle 1 and 2, EPID-L-2018-LLR-0162, LAR RE: Removal of Operating Mode Restrictions for Performing Surveillance Testing of the Div 3 Battery and HPCS DG, ADDITIONAL DRAFT Request for Additional Information (RAI)
Sent Date: 3/5/2019 8:14:56 AM
Received Date: 3/5/2019 8:14:00 AM
From: Vaidya, Bhalchandra

Created By: Bhalchandra.Vaidya@nrc.gov

Recipients:
"Sprengel, Ryan:(GenCo-Nuc)" <Ryan.Sprengel@exeloncorp.com>
Tracking Status: None
"david.gullott@exeloncorp.com" <david.gullott@exeloncorp.com>
Tracking Status: None

Post Office: BN7PR09MB2595.namprd09.prod.outlook.com

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Options
Priority: Standard
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Reply Requested: No
Sensitivity: Normal
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