

From: Vaidya, Bhalchandra
Sent: Monday, March 30, 2020 2:38 PM
To: Kusumawatimurray, Putri:(GenCo-Nuc); Taken, Jason C.:(Exelon Nuclear)
Cc: Salgado, Nancy
Subject: LaSalle Units 1 and 2, EPID-L-2020-LLA-0017 License Amendment Request re: 10 CFR 50.69 , Audit Plan

Subject: LA SALLE COUNTY STATION, Units 1 and 2 - AUDIT PLAN REGARDING LICENSE AMENDMENT REQUEST FOR CATEGORIZATION AND TREATMENT OF STRUCTURES, SYSTEMS AND COMPONENTS, DOCKET NOS. 50-373 and 50-374 (EPID-L-2020-LLA-0017)

Dwi and Jason,

The U.S. Nuclear Regulatory Commission (NRC) staff has started the review of the license amendment request (LAR) to modify LaSalle's licensing basis to allow for the implementation of the provisions of Title 10 of the Code of Federal Regulations (10 CFR), Part 50, Section 69 (50.69), and determined that a regulatory audit of the technical acceptability of the probabilistic risk assessments (PRAs) used to develop insights to support the licensee's proposed approach would assist in the timely completion of the LAR review. A regulatory audit is a planned activity that includes the examination and evaluation of primarily non-docketed information. The audit will be conducted to increase the NRC staff's understanding of the LAR and identify information that will require docketing to support the NRC staff's regulatory finding. The NRC staff will conduct a regulatory audit to support its review of the LAR in accordance with the following audit plan.

I. BACKGROUND

By letter dated January 31, 2020 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML20031E699), Exelon Generation Company, LLC (Exelon, the licensee) requested that the NRC modify the Licensing Basis of Renewed Facility Operating License Nos. NPF-11 and NPF-18 for LaSalle County Station, Units 1 and 2 (LaSalle). Exelon's proposed license amendment request would modify LaSalle's licensing basis to allow for the implementation of the provisions of Title 10 of the Code of Federal Regulations (10 CFR), Part 50, Section 69 (50.69), "Risk-Informed Categorization and Treatment of Structures, Systems and Components [SSCs] for Nuclear Power Reactors". The proposed changes are based on NEI 00-04, "10 CFR 50.69 SSC Categorization Guideline," Revision 0 dated July 2005 (ADAMS Accession No. ML052910035).

II. REGULATORY AUDIT BASES

The basis of this audit is the licensee's LAR for LaSalle, and the Standard Review Plan Section 19.2, "Review of Risk Information Used to Support Permanent Plant-Specific Changes to the Licensing Basis: General Guidance" (ADAMS Accession No. ML071700658).

The audit will be performed consistent with NRC Office of Nuclear Reactor Regulation Office Instruction LIC-111, Revision 1, "Regulatory Audits," dated October 31, 2019 (ADAMS Accession No. ML19226A274). An audit was determined to be the most efficient approach toward a timely resolution of issues associated with this LAR review, since the staff will have an opportunity to minimize the potential for multiple rounds of requests for additional information

(RAIs) and ensure no unnecessary burden will be imposed by requiring the licensee to address issues that are no longer necessary to make a safety determination.

III. PURPOSE AND SCOPE

The purpose of the audit is to gain a more detailed understanding of licensee's process to implement risk-informed categorization and treatment of structures, systems and components as proposed in the LAR. The NRC staff will review internal events and fire PRA and the risk informed approach implementing 10 CFR 50.69.

The areas of focus for the regulatory audit are the information contained in the licensee's submittal, the enclosed audit information needs, and all associated and relevant supporting documentations (e.g., methodology, process information, calculations, etc.). The relevant supporting documents are identified below.

IV. INFORMATION AND OTHER MATERIAL NECESSARY FOR THE REGULATORY AUDIT

The following documentation should be available to the audit team:

1. Reports of peer reviews (full-scope and focused-scope), self-assessments, and Facts & Observations (F&Os) closure reviews for the internal events, internal flooding, and fire PRAs cited in LaSalle's LAR dated January 31, 2020;
2. Uncertainty notebooks for the LaSalle internal events, internal flooding, and fire PRAs related to PRA model assumptions and sources of uncertainty;
3. Documentation on evaluation of the generic and plant specific uncertainties with respect to the Lasalle LAR dated January 31, 2020;
4. PRA notebooks for the modeling of FLEX equipment and FLEX human error probabilities, if credited in the PRA;
5. Results of the fire PRA and resolution of F&Os;
6. Available 10 CFR 50.69 SSC categorization program procedures (e.g., categorization review and adjustment process, decision criteria for Independent Decision-Making Panel (IDP)); and
7. Any other supporting documentation that the licensee may determine is responsive to the staff's above information requests;

The NRC staff may request additional documents that would be needed on the portal as the audit progresses.

V. AUDIT TEAM

The members of the audit team for "In-Office" as well as "Site" Audits are:

Name	Organization	Email
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Adrienne Brown	NRC	Adrienne.Driver@nrc.gov
Todd Hilsmeier	NRC	Todd.Hilsmeier@nrc.gov
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Bhalchandra Vaidya	NRC	Bhalchandra.Vaidya@nrc.gov

The NRC staff may request access for additional staff as the audit progresses.

VI. LOGISTICS

The audit will be conducted in two parts: “In-Office” which will commence when an online portal (i.e., electronic portal, ePortal, electronic reading room) containing the documents requested in Section IV of this audit plan is established by Exelon, and “Site” from June 15, 2020 to June 19, 2020. The NRC staff requests dedicating 2 – 2.5 days for the audit of the proposed alternate seismic approach, including a potential plant walkdown for that audit (i.e., the audit for the proposed alternate seismic approach is not conducted in parallel with other audit(s)). NRC staff and contractors’ access to the online portal should be terminated when the Audit Report is issued.

The NRC project manager will coordinate any changes to the audit schedule and location with the licensee.

VII. SPECIAL REQUESTS

A walkdown as part of the alternate seismic approach audit would be conducted during the Site Audit. Those details will be provided as part of the supplement to the Audit Plan later. . The NRC staff would like access to the documents listed above in Section IV through an online portal that allows the NRC staff and contractors to access documents via the internet. The following conditions associated with the online portal must be maintained throughout the duration that the NRC staff and contractors have access to the online portal:

- The online portal will be password-protected, and separate passwords will be assigned to the NRC staff and contractors who are participating in the audit.
- The online portal will be sufficiently secure to prevent the NRC staff and contractors from printing, saving, downloading, or collecting any information on the online portal.
- Conditions of use of the online portal will be displayed on the login screen and will require acknowledgement by each user.
- User name and password information should be provided directly to the NRC staff and contractors. The NRC project manager will provide Exelon the names and contact information of the NRC staff and contractors who will be participating in the audit. All other communications should be coordinated through the NRC project manager.

VIII. DELIVERABLES

An audit summary, which may be public, will be prepared within 90 days of the completion of the audit. If the NRC staff identifies information during the audit that is needed to support its regulatory decision, the staff will issue RAIs to the licensee.

Please contact me, if you have any questions.

Sincerely,

Bhalchandra K. Vaidya., Licensing Project Manager
Plant Licensing Branch 3
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation
Docket Nos. 50-373 and 50-374
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Recipients:

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Tracking Status: None

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