

September 1, 1995

Mr. D. L. Farrar  
Manager, Nuclear Regulatory Services  
Commonwealth Edison Company  
Executive Towers West III  
1400 Opus Place, Suite 500  
Downers Grove, IL 60515

SUBJECT: LASALLE COUNTY STATION, UNITS 1 AND 2 - REQUEST FOR ADDITIONAL INFORMATION (TAC NOS. M90704 AND M90705)

Dear Mr. Farrar:

By letter dated October 14, 1994, Commonwealth Edison Company submitted the Second Ten-Year Interval Inservice Inspection Program Plan, Revision 0, and the associated requests for relief from the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code (Code), Section XI, requirements for LaSalle County Station, Units 1 and 2. The NRC staff has completed a preliminary review of your submittal and has identified additional information needed to continue its evaluation, as discussed in the enclosure.

We request your response be provided within 60 days of receipt of this letter to meet the staff's inservice inspection program plan review schedule. In addition, to expedite the review process, we request that you send a copy of your response to our contractor, Idaho National Engineering Laboratory, at the following address:

Mike T. Anderson  
INEL Research Center  
2157 North Boulevard  
P.O. Box 1625  
Idaho Falls, Idaho 83415-2209

This requirement affects one respondent and, therefore, is not subject to the Office of Management and Budget review under Public Law 96-511.

Sincerely,

Original signed by:

Robert M. Latta, Project Manager  
Project Directorate III-2  
Division of Reactor Projects III/IV  
Office of Nuclear Reactor Regulation

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PDR ADOCK 05000373  
PDR

Docket Nos. 50-373, 50-374

Enclosure: Request for Additional Information

cc w/encl: See next page

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D. L. Farrar  
Commonwealth Edison Company

LaSalle County Station  
Unit Nos. 1 and 2

cc:

Phillip P. Steptoe, Esquire  
Sidley and Austin  
One First National Plaza  
Chicago, Illinois 60603

Robert Cushing  
Chief, Public Utilities Division  
Illinois Attorney General's Office  
100 West Randolph Street  
Chicago, Illinois 60601

Assistant Attorney General  
100 West Randolph Street  
Suite 12  
Chicago, Illinois 60601

Michael I. Miller, Esquire  
Sidley and Austin  
One First National Plaza  
Chicago, Illinois 60603

U.S. Nuclear Regulatory Commission  
Resident Inspectors Office LaSalle Station  
2605 N. 21st Road  
Marseilles, Illinois 61341-9756

Chairman  
LaSalle County Board of Supervisors  
LaSalle County Courthouse  
Ottawa, Illinois 61350

Attorney General  
500 South Second Street  
Springfield, Illinois 62701

Chairman  
Illinois Commerce Commission  
Leland Building  
527 East Capitol Avenue  
Springfield, Illinois 62706

Illinois Department of Nuclear Safety  
Office of Nuclear Facility Safety  
1035 Outer Park Drive  
Springfield, Illinois 62704

Regional Administrator  
U.S. NRC, Region III  
801 Warrenville Road  
Lisle, Illinois 60532-4351

LaSalle Station Manager  
LaSalle County Station  
Rural Route 1  
P.O. Box 220  
Marseilles, Illinois 61341

REQUEST FOR ADDITIONAL INFORMATION

SECOND 10-YEAR INTERVAL INSERVICE INSPECTION PROGRAM PLAN

1. Scope/Status of Review

Throughout the service life of a water-cooled nuclear power facility, 10 CFR 50.55a(g)(4) requires that components (including supports) that are classified as American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code (Code) Class 1, 2, and 3 meet the requirements, except design and access provisions and preservice examination requirements, set forth in the ASME Code, Section XI, "Rules for Inservice Inspection of Nuclear Power Plant Components", to the extent practical within the limitations of design, geometry and materials of construction of the components. This section of the regulations also requires that inservice examinations of components and system pressure tests conducted during the successive 120-month inspection interval shall comply with the requirements in the latest edition and addenda of the Code incorporated by reference in 10 CFR 50.55a(b) on the date 12 months prior to the start of a successive 120-month interval, subject to the limitations and modifications listed therein. The components (including supports) may meet requirements set forth in subsequent editions and addenda of the Code that are incorporated by reference in 10 CFR 50.55a(b) subject to the limitations and modifications listed therein. The licensee, Commonwealth Edison Company, has prepared the LaSalle County Station, Units 1 and 2, Second 10-Year Interval Inservice Inspection (ISI) Program Plan to meet the requirements of the 1989 Edition of Section XI of the ASME Code.

As required by 10 CFR 50.55a(g)(5), if the licensee determines that certain Code examination requirements are impractical and requests relief, the licensee shall submit information to the Nuclear Regulatory Commission (NRC) to support that determination.

The staff has reviewed the available information in the LaSalle County Station, Units 1 and 2, Second 10-Year Interval ISI Program Plan, Revision 0, submitted October 14, 1994, and the requests for relief from the ASME Code, Section XI, requirements that the licensee has determined to be impractical.

2. Additional Information Required

Based on the above review, the staff has concluded that additional information and/or clarification is required to complete the review of the ISI Program Plan.

- A. Provide a list of the components subject to examination during the second 10-year interval; include a list of Code Class 1, 2, and 3 piping and components that have been exempted from examination and the basis for their exemption.

ENCLOSURE

Note: The requested list, along with the isometric/component drawings provided, will permit the staff to review the extent to which ISI examinations meet the applicable Code requirements.

- B. Provide a list of the ultrasonic calibration standards being used during the second 10-year interval ISI at LaSalle County Station, Units 1 and 2. The list should include the calibration standard identifications, material specifications, and sizes, as well as a reference to the piping and/or components to which the calibration standards apply.
- C. Address the degree of compliance with augmented examinations that have been established by the NRC when added assurance of structural reliability is deemed necessary. Examples of documents that address augmented examinations are:
- (1) Branch Technical Position MEB 3-1, *High Energy Fluid Systems, Protection Against Postulated Piping Failures in Fluid Systems Outside Containment*;
  - (2) Regulatory Guide 1.150, *Ultrasonic Testing of Reactor Vessel Welds During Preservice and Inservice Examinations*;
  - (3) NUREG-0619, *BWR Feedwater Nozzle and CRD Return Line Nozzle Cracking*;
  - (4) NUREG-0803, *Integrity of BWR Scram System Piping*; and
  - (5) Generic Letter 88-01, "NRC Position on IGSCC in BWR Austenitic Stainless Steel Piping" (reference NUREG-0313).

Discuss these and any other augmented examinations that may have been incorporated in the LaSalle County Station, Units 1 and 2, Second 10-Year Interval Inservice Inspection Program Plan.

- D. Define the systems or portions of systems that provide Residual Heat Removal (RHR), Emergency Core Cooling (ECC), and Containment Heat Removal (CHR) functions at LaSalle County Station, Units 1 and 2, and provide a list of the subject welds that have been excluded from selection based on wall thickness as allowed by Table IWC-2500-1. From this list, identify those welds that will be scheduled for examination to provide an appropriate sampling of excluded examination areas.

Note: Paragraph 10 CFR 50.55a(b)(2)(iv) requires that appropriate ASME Code Class 2 piping welds in the RHR, ECC, and CHR systems shall be examined. Portions of these systems should not be completely omitted from inservice volumetric examination based on Section XI selection criteria (piping wall thickness) specified in Table IWC-2500-1. The staff has previously determined that a

7.5 percent augmented volumetric sample of thin-wall welds constitutes an acceptable resolution at similar plants.

- E. Provide the staff with the status of the augmented reactor pressure vessel (RPV) examinations required by new regulations issued September 8, 1992, and provide a technical discussion describing how the regulation was/will be implemented for these welds at LaSalle County Station. Include in the discussion a description of the approach and any specialized techniques or equipment that was/will be used to complete the required augmented examination.

Note: Effective September 8, 1992, new regulations were issued regarding augmented examination of reactor vessels. As a result of these regulations, all licensees must augment their reactor vessel examinations by implementing once, as part of the ISI interval in effect on September 8, 1992, the examination requirements for reactor vessel shell welds specified in Item B1.10 of Examination Category B-A of the 1989 Code. In addition, all previously granted relief for Item B1.10, Examination Category B-A, for the interval in effect on September 8, 1992, is revoked by the new regulation. For licensee's with fewer than 40 months remaining in the interval on the effective date, deferral of the augmented examination is permissible with the conditions stated in the regulations.

- F. Regarding Request for Relief No. CR-12, which deals with reactor vessel closure stud examination requirements, address LaSalle County Station's compliance with Appendix VI and provide assurance that the enhanced volumetric technique provides an equivalent sensitivity to that of the Code-required surface examination.

[Although a discussion on the use of an enhanced ultrasonic examination technique for the reactor closure studs was provided, it appears that the enhanced technique is being used in lieu of removal of additional studs when surface examinations of removed studs reveal flaws that exceed acceptance standards. It should be noted that the applicable requirement for volumetric examination of studs is in Appendix VI of the 1989 Edition of Section XI. This Appendix requires that the volumetric technique and personnel be qualified for examination of studs.]

- G. Regarding Request for Relief CR-10, which addresses limited ultrasonic and surface examination of Examination Category B-J, C-F-1, and C-F-2 welds, provide a list of the applicable welds, drawings depicting the joint designs, and ultrasonic coverage plots where Code requirements are not satisfied.

Note: This request for relief appears to be generic in nature as specific welds have not been identified. For this request for relief to be considered, the licensee must submit information

specific to each weld where Code-required examinations have not been satisfied.

- H. Regarding Request for Relief CR-14, which addresses examination of the RPV support weld, provide a technical discussion of the possibility of a volumetric examination of the C-D region of Figure IWB-2500-13. Based on the review of Figure IWB-2500-13, the required surface examination, and the licensee's submittal, it appears that access to examination area C-D is restricted due to the RPV lower head and support skirt configuration. The licensee has not, however, proposed any alternative examination for the C-D region.
- I. Regarding Request for Relief No. PR-04, which addresses alternative testing for the RHR heat exchanger tubes, discuss how the proposed alternative provides an acceptable level of quality and safety when it is essentially based on the loss of system integrity. (The licensee's proposed alternative is to monitor radiation levels across the pressure boundary during shell-side pressure tests.) Other utilities have proposed eddy current testing of the heat exchanger tubing and a VT-2 visual examination when the channel head cover is removed for maintenance activities.
- J. Verify that there are no relief requests in addition to those submitted. If additional relief requests are required, the licensee should submit them for staff review.