



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**

REGION III
2443 WARRENVILLE ROAD, SUITE 210
LISLE, ILLINOIS 60532-4352

December 29, 2020

Mr. Bryan C. Hanson
Senior VP, Exelon Generation Company, LLC
President and CNO, Exelon Nuclear
4300 Winfield Road
Warrenville, IL 60555

**SUBJECT: LASALLE COUNTY STATION UNITS 1 AND 2 - NOTIFICATION OF AN NRC
TRIENNIAL HEAT SINK PERFORMANCE INSPECTION AND REQUEST FOR
INFORMATION; INSPECTION REPORT 05000373/2021002;
05000374/2021002**

Dear Mr. Hanson:

On April 5, 2021, the U.S. Nuclear Regulatory Commission (NRC) will begin the onsite portion of the Triennial Heat Sink Performance Inspection at your Lasalle County Nuclear Power Plant. This inspection will be performed in accordance with NRC baseline Inspection Procedure 71111.07.

In order to minimize the impact that the inspection has on the site and to ensure a productive inspection, we have enclosed a request for documents needed for the inspection. The documents have been divided into three groups.

- The first group lists information necessary for our initial inspection scoping activities. This information should be available to the lead inspector no later than February 8, 2021. By February 19, 2021, the inspector will communicate the initial selected set of approximately 2-3 risk significant heat exchangers.
- The second group is needed to support our in-office preparation activities. This set of documents, including the calculations associated with the selected heat exchangers, should be available at the Regional Office no later than March 15, 2021. This information should be separated for each selected component, especially if provided electronically (e.g., folder with component name that includes calculations, condition reports, maintenance history, etc.). During the in-office preparation activities, the inspector may identify additional information needed to support the inspection.
- The last group includes the additional information above as well as plant specific reference material. This information should be available to the inspector on March 22, 2021. It is also requested that corrective action documents and/or questions developed during the inspection be provided to the inspector as the documents are generated.

All requested documents are to be for the time period from the onsite inspection period back to the documents that were provided in response to the previous Heat Sink Performance Inspection. If no activities were accomplished in that time period, then the request applies to the last applicable document in the previous time period. It is important that these documents be as complete as possible, in order to minimize the number of documents requested during the preparation week or during the onsite inspection.

The lead inspector for this inspection is Gerard O'Dwyer. We understand that our licensing contact for this inspection is Jereme Greenblott of your organization. If there are any questions about the inspection or the material requested in the enclosure, please contact the lead inspector at 630-829-9624 or via e-mail at Gerard.O'Dwyer@nrc.gov.

This letter does not contain new or amended information collection requirements subject to the Paperwork Reduction Act of 1995 (44 U.S.C. 3501 et seq.). Existing information collection requirements were approved by the Office of Management and Budget, Control Number 3150-0011. The NRC may not conduct or sponsor, and a person is not required to respond to, a request for information or an information collection requirement unless the requesting document displays a currently valid Office of Management and Budget Control Number."

In accordance with Title 10 of the *Code of Federal Regulations* (10 CFR) 2.390, "Public Inspections, Exemptions, Requests for Withholding," of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's Agencywide Documents Access and Management System (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

Sincerely,

/RA/

Gerard O'Dwyer, Reactor Engineer
Engineering Branch 2
Division of Reactor Safety

Docket Nos. 50-373; 50-374
License Nos. NPF-11; NPF-18

Enclosure:
Triennial Heat Sink Performance Inspection
Document Request

cc: Distribution via LISTSERV®

Letter to Bryan C. Hanson from Gerard O'Dwyer dated December 29, 2020.

SUBJECT: LASALLE COUNTY STATION UNITS 1 AND 2 - NOTIFICATION OF AN NRC
TRIENNIAL HEAT SINK PERFORMANCE INSPECTION AND REQUEST FOR
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05000374/2021002

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TRIENNIAL HEAT SINK PERFORMANCE INSPECTION DOCUMENT REQUEST

Inspection Report: 05000373/2021002; 05000374/2021002

Inspection Dates: April 5 – 9, 2021

Inspection Procedure: IP 71111.07, "Heat Sink Performance"

Lead Inspector: Gerard O'Dwyer
630-829-9624
Gerard.O'Dwyer@nrc.gov

I. Information Requested By February 8, 2021

1. List of the Generic Letter (GL) 89-13, "Service Water System Problems Affecting Safety-Related Equipment," heat exchangers in order of risk significance.
2. Copy of heat exchanger performance trending data tracked for each GL 89-13 heat exchanger.
3. List of corrective action program documents (with a short description) associated with GL 89-13 heat exchangers, heat sinks, silting, corrosion, fouling, or heat exchanger testing, for the previous three years or since the last corrective action program document list was sent to the NRC for the previous heat sink performance inspection. The list should include all corrective action program documents not on the last corrective action program document list.
4. Copy of any self-assessment done on any of GL 89-13 heat exchangers.
5. Last two System Health Report(s) and maintenance rule system notebooks for all the GL 89-13 heat exchangers.
6. List of engineering-related operator workarounds (with a short description) associated with GL 89-13 heat exchangers. The requested documents are to be for the time period from the onsite inspection period back to the documents that were provided in response to the previous heat sink performance inspection.
7. List of permanent and temporary modifications (with a short description) associated with GL 89-13 heat exchangers. The requested documents are to be for the time period from the onsite inspection period back to the documents that were provided in response to the previous heat sink performance inspection.

II. Information Requested By March 15, 2021

1. Copies of the GL 89-13 responses.
2. Copy of the Updated Final Safety Analysis Report (UFSAR) section applicable to the GL 89-13 Heat Exchanger Program.

Enclosure

TRIENNIAL HEAT SINK PERFORMANCE INSPECTION DOCUMENT REQUEST

3. Copies of procedures developed to implement the recommendations of GL 89-13 (e.g. the GL 89-13 Heat Exchanger Program description).
4. Copies of the selected corrective action program documents.
5. For the specific heat exchangers selected:
 - a. Copies of the UFSAR sections applicable for each heat exchanger.
 - b. Copy of system description and design basis document for the heat exchangers (as applicable).
 - c. Provide a list of calculations (with a short description) which currently apply to each heat exchanger.
 - i. Establish the limiting design basis heat load required to be removed by each of these heat exchangers;
 - ii. Demonstrate the heat exchangers capacity to remove the limiting heat load;
 - iii. Correlate surveillance testing and/or inspection results from these heat exchangers with design basis heat removal capability (e.g., basis for surveillance test and/or inspection acceptance criteria);
 - iv. Evaluate the potential for water hammer in each heat exchanger or associated piping; and
 - v. Evaluate excessive tube vibration in each heat exchanger.
 - d. Copy of any operability determinations or other documentation of degradation associated with the heat exchangers or the systems that support the operation for the selected heat exchangers.
 - e. Copy of the construction code, Design Specification, heat exchanger data sheets, and vendor documents including component drawings applicable for the heat exchangers.
 - f. Copies of normal, abnormal, and emergency operating procedures associated with the selected heat exchangers.
6. For the ultimate heat sink (UHS) and the safety-related service water system (or equivalent):
 - a. Copies of the applicable UFSAR sections.
 - b. Copy of system description and design basis document (as applicable).
 - c. Copy of any operability determinations or other documentation of degradation associated with the UHS and the safety-related service water system.

TRIENNIAL HEAT SINK PERFORMANCE INSPECTION DOCUMENT REQUEST

- d. Copy of the document (e.g. UFSAR, Technical Requirements Manual or procedure) that states the maximum cooling water system inlet temperature limit that still allows full licensed power operation of the nuclear reactor.
 - e. Copy of system description and design basis document (as applicable).
 - f. Copy of the construction code and Design Specification.
 - g. Copies of normal, abnormal, and emergency operating procedures associated with the UHS and safety-related service water systems including procedures for loss of these systems.
 - h. Copies of corrective action documents associated with water hammer or hydraulic transients in the service water system since the last Heat Sink Inspection.
 - i. Provide an electronic copy of piping and instrumentation diagrams (P&IDs) for the service water system, including the intake structure.
 - j. Provide a list of calculations (with a short description), which currently apply to UHS and safety-related service water system.
 - k. Provide a list of instruments (with a short description) associated with automatic or alarm functions for the safety-related service water system and/or UHS.
 - l. Provide a list of any design change (with a short description) performed on the UHS or safety-related service water system since the last heat sink performance inspection.
7. A schedule of all inspections, cleanings, maintenance, or testing of any safety-related plant heat exchanger to be performed during the on-site portion of the inspection.

III. Information Requested to Be Available for Inspection Preparation, March 22, 2021

- 1. For the specific heat exchangers selected:
 - a. Copy of the calculation which correlates surveillance testing results from these heat exchangers with design basis heat removal capability (e.g. basis for surveillance test acceptance criteria).
 - b. Copies of the two most recent completed tests and evaluation data confirming thermal performance for those heat exchangers which are performance tested.
 - c. Documentation and procedures that identify the types, accuracy, and location of any special instrumentation used for the two most recently completed thermal performance tests for the heat exchangers (e.g., high accuracy ultrasonic flow instruments or temperature instruments). Include calibration records for the instruments used during these tests.
 - d. Information regarding any alarms which monitor on-line performance.

TRIENNIAL HEAT SINK PERFORMANCE INSPECTION DOCUMENT REQUEST

- e. Copy of the document describing the inspection results of each heat exchanger. The requested documents are to be for the time period from the onsite inspection period back to the documents that were provided in response to the previous heat sink performance inspection.
 - f. The cleaning and inspection maintenance schedule for each heat exchanger for the next 5 years.
 - g. Copy of the design specification and heat exchanger data sheets for each heat exchanger.
 - h. Copy of the vendor manuals including component drawings for each heat exchanger.
 - i. Copy of the calculation which establishes the limiting (maximum) design basis heat load which is required to be removed by each of these heat exchangers.
 - j. Copy of the operating procedures that ensure that the maximum cooling water system inlet temperature limit is not exceeded.
 - k. Copy of the calculations or documents which evaluate the potential for water hammer in each heat exchanger or associated piping.
 - l. Copy of the calculations that evaluate excessive tube vibration in each heat exchanger and the documents that describe the controls that prevent heat exchanger degradation due to excessive flow induced vibration during operation.
 - m. Copy of the periodic flow testing at or near maximum design flow. The requested documents are to be for the time period from the onsite inspection period back to the documents that were provided in response to the previous heat sink performance inspection.
 - n. Copy of the document which identifies the current number of tubes in service for each heat exchanger and the supporting calculation which establishes the maximum number of tubes which can be plugged in each heat exchanger.
 - o. Copy of the document establishing the repair criteria (plugging limit) for degraded tubes which are identified in each heat exchanger.
 - p. Copies of the documents that verify the structural integrity of the heat exchanger (e.g. eddy current summary sheets, ultrasonic testing results, and visual inspection results).
 - q. Copies of those documents that describe the methods taken to control water chemistry in the heat exchangers.
2. For the review of the operation of the safety-related service water system (or equivalent) and the UHS:

TRIENNIAL HEAT SINK PERFORMANCE INSPECTION DOCUMENT REQUEST

- a. Copies of any design change performed on the UHS. The requested documents are to be for the time period from the onsite inspection period back to the documents that were provided in response to the previous heat sink performance inspection.
- b. Copies of any design change performed on the safety-related service water system. The requested documents are to be for the time period from the onsite inspection period back to the documents that were provided in response to the previous heat sink performance inspection.
- c. Copies of procedures for a loss of UHS. Provide documentation that the instrumentation, which is relied on for decision-making is available and functional.
- d. Copies of procedures for a loss of service water system. Provide copies of procedures that include specific guidance for a loss of intake structure, loss of all service water pumps, or pipe rupture, as applicable. Provide documentation that Intake bay water level instrumentation used by emergency operating procedures (EOPs) and Emergency Plan emergency action levels (EAL), during abnormal or emergency conditions use that same locations for measuring the Technical Specification UHS water level and the emergency plan EAL UHS water level is effectively the same.
- e. Provide documentation of inspections and maintenance done to prevent macrofouling (e.g. silt, dead mussel shells, or debris) and biotic fouling (e.g. fish, algae, grass, or kelp). Provide documentation of biocide treatments were accomplished as scheduled, controlled, and the results were monitored, trended, and evaluated. Provide documentation that the biocide treatment program is consistent with industry standards. Provide documentation that treatment results met licensee established acceptance criteria and maintained satisfactory biotic control. Provide documentation that microbiological induced corrosion (MIC) was monitored, trended, and controlled. The requested documents are to be for the time period from the onsite inspection period back to the documents that were provided in response to the previous heat sink performance inspection.
- f. Copies of chemistry procedures that monitor service water intake for pH, calcium hardness, etc. Also, provide copies of the associated results. Provide documentation showing that calcium would not plate-out on hot heat exchanger tubes during a design basis event. Provide documentation that common water quality chemistry analysis of indicators, e.g., Langeliers Index were used to reduce the likelihood of degrading the heat transfer coefficient due to calcium deposits. The requested documents are to be for the time period from the onsite inspection period back to the documents that were provided in response to the previous heat sink performance inspection.
- g. Copies of documents associated with the monitoring of pump performance for potential strong-pump vs. weak-pump interaction that demonstrate the potential does not exist or no adverse effects result from the interaction during routine system operation, testing and following pump maintenance. Provide vendor pump curves and pump curves developed during system testing. Provide Lasalle Station's response to Bulletin 88-04. Provide Lasalle's system hydraulic model,

TRIENNIAL HEAT SINK PERFORMANCE INSPECTION DOCUMENT REQUEST

with assumptions on mini-flow, and case studies with parallel pumps operating in the mini-flow mode.

3. For the review associated with the system walkdown of the safety-related service water system:
 - a. Copies of the testing, inspection, or monitoring program procedures for buried or inaccessible piping and documentation of the associated results and evaluations including documentation of any licensee walkdowns (including pictures, notes, etc.). Provide documentation with results demonstrating that piping inspections and monitoring programs included periodic checks of riser penetrations (e.g., a vertical pipe coming up through a cement floor or foundation) and also included checks of inspection manways on large bore piping (e.g., where the manway attaches to the pipe). The requested documents are to be for the time period from the onsite inspection period back to the documents that were provided in response to the previous heat sink performance inspection.
 - b. Copies of the ultrasonic test results and visual inspection results that verify the structural integrity of the piping.
 - c. Copies of the procedures with results monitoring, assessing, and dispositioning of active thru wall pipe leaks, including structural evaluations and/or planned corrective actions.
 - d. Provide the history of any thru wall pipe leaks on the system. The requested documents are to be for the time period from the onsite inspection period back to the documents that were provided in response to the previous heat sink performance inspection.
 - e. Copies of the documents associated with the periodic inspection program (and results) used to detect protective coating failure, corrosion, and erosion.
 - f. Copies of the IST vibration monitoring results and operational history for deep draft vertical pumps, if applicable. Provide Lasalle's responses to Bulletin 79-15, and Information Notices 80-07, 93-68, 94-45, and 07-05. The requested documents are to be for the time period from the onsite inspection period back to the documents that were provided in response to the previous heat sink performance inspection.

If the information requested above will not be available, please contact Gerard O'Dwyer as soon as possible at 630-829-9624 or e-mail Gerard.O'Dwyer@nrc.gov.