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RS-17-133

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October 3, 2017

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

LaSalle County Station, Units 1 and 2
Renewed Facility Operating License Nos. NPF-11 and NPF-18
NRC Docket Nos. 50-373 and 50-374

Subject: Additional Supplemental Information Regarding LaSalle County Station License Amendment Request for Extension of Type A and Type C Containment Leak Rate Test Intervals

References:

1) Letter from D. M. Gullott (Exelon Generation Company, LLC) to U.S. Nuclear Regulatory Commission, "License Amendment Request to Revise Technical Specifications 5.5.13, 'Primary Containment Leakage Rate Testing Program,' for Permanent Extension of Type A and Type C Leak Rate Test Frequencies," dated October 26, 2016 (ADAMS Accession No. ML16300A200)

2) Letter from D. M. Gullott (Exelon Generation Company, LLC) to U.S. Nuclear Regulatory Commission, "Supplement to License Amendment Request for Permanent Extension of Type A and Type C Leak Rate Test Frequencies Regarding Hardened Containment Vent System (HCVS) Modifications and Installation of Primary Containment Isolation Valves (PCIVs)," dated February 16, 2016 (ADAMS Accession No. ML17048A255)

3) Letter from D. M. Gullott (Exelon Generation Company, LLC) to U.S. Nuclear Regulatory Commission, "Response to Request for Additional Information Regarding LaSalle County Station License Amendment Request for Extension of Type A and Type C Containment Leak Rate Test Intervals (SBPB Branch)," dated July 17, 2017 (ADAMS Accession No. ML17200C944)

4) Letter from D. M. Gullott (Exelon Generation Company, LLC) to U.S. Nuclear Regulatory Commission, "Response to Request for Additional Information Regarding LaSalle County Station License Amendment Request for Extension of Type A and Type C Containment Leak Rate Test Intervals (PRA Branch)," dated August 8, 2017 (ADAMS Accession No. ML17220A168)

5) Letter from D. M. Gullott (Exelon Generation Company, LLC) to U.S. Nuclear Regulatory Commission, "Supplemental Information Regarding LaSalle County Station License Amendment Request for Extension of Type A and Type C Containment Leak Rate Test Intervals," dated September 27, 2017 (ADAMS Accession No. ML17270A274)

By a letter to the U.S. Nuclear Regulatory Commission (NRC) dated October 26, 2016, (Reference 1), Exelon Generation Company, LLC (EGC) submitted an amendment request for LaSalle County Station (LSCS), Units 1 and 2. The proposed amendment would revise the Technical Specifications (TS) 5.5.13, "Primary Containment Leakage Rate Testing Program," to allow for the permanent extension of the Type A integrated leak rate testing (ILRT) and Type C leak rate testing frequencies. This request was supplemented by EGC letters dated February 16, July 17, August 8, and September 27, 2017 (References 2, 3, 4, and 5).

As discussed during a conference call with the NRC on September 28, 2017, additional supplemental information is being provided to support the NRC's review of the EGC request submitted on October 26, 2016 (Reference 1) and the supplement submitted September 27, 2017 (Reference 5). The Attachment to this letter provides the supplemental information.

EGC has reviewed the information supporting a finding of no significant hazards consideration that was previously provided to the NRC in Attachment 1 of Reference 1. The supplemental information provided in this submittal does not affect the bases for concluding that the proposed license amendment request does not involve a significant hazards consideration. In accordance with 10 CFR 50.91, "Notice for public comment; State consultation," paragraph (b), EGC is notifying the State of Illinois of this application for license amendment by transmitting a copy of this letter and its Attachment to the designated State Official.

There are no regulatory commitments contained within this letter. Should you have any questions concerning this letter, please contact Ms. Lisa A. Simpson at (630) 657-2815.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 3rd day of October 2017.

Respectfully,

David M. Gullott
Manager – Licensing
Exelon Generation Company, LLC

Attachment: Supplemental Information

cc: NRC Regional Administrator, Region III
NRC Senior Resident Inspector, LaSalle County Station
Illinois Emergency Management Agency – Division of Nuclear Safety

ATTACHMENT
Supplemental Information

By a letter to the U.S. Nuclear Regulatory Commission (NRC) dated October 26, 2016, Exelon Generation Company, LLC (EGC) submitted an amendment request to revise the Technical Specifications (TS) 5.5.13, "Primary Containment Leakage Rate Testing Program," to allow for the permanent extension of the Type A integrated leak rate testing (ILRT) and Type C leak rate testing frequencies for LaSalle County Station (LSCS), Units 1 and 2. This request was supplemented by EGC letters dated February 16, July 17, August 8, and September 27, 2017 (References 2, 3, 4, and 5).

As discussed during a conference call with the NRC on September 28, 2017, supplemental information is being provided to support the NRC's review of the EGC request submitted on October 26, 2016 (Reference 1) and the supplement submitted September 27, 2017 (Reference 5). The information below provides a detailed explanation of Tables 3.4.5-1 and 3.4.5-2 in Reference 1.

References:

1) Letter from D. M. Gullott (Exelon Generation Company, LLC) to U.S. Nuclear Regulatory Commission, "License Amendment Request to Revise Technical Specifications 5.5.13, 'Primary Containment Leakage Rate Testing Program,' for Permanent Extension of Type A and Type C Leak Rate Test Frequencies," dated October 26, 2016 (ADAMS Accession No. ML16300A200)

2) Letter from D. M. Gullott (Exelon Generation Company, LLC) to U.S. Nuclear Regulatory Commission, "Supplement to License Amendment Request for Permanent Extension of Type A and Type C Leak Rate Test Frequencies Regarding Hardened Containment Vent System (HCVS) Modifications and Installation of Primary Containment Isolation Valves (PCIVs)," dated February 16, 2016 (ADAMS Accession No. ML17048A255)

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4) Letter from D. M. Gullott (Exelon Generation Company, LLC) to U.S. Nuclear Regulatory Commission, "Response to Request for Additional Information Regarding LaSalle County Station License Amendment Request for Extension of Type A and Type C Containment Leak Rate Test Intervals (PRA Branch)," dated August 8, 2017 (ADAMS Accession No. ML17220A168)

5) Letter from D. M. Gullott (Exelon Generation Company, LLC) to U.S. Nuclear Regulatory Commission, "Supplemental Information Regarding LaSalle County Station License Amendment Request for Extension of Type A and Type C Containment Leak Rate Test Intervals," dated September 27, 2017 (ADAMS Accession No. ML17270A274)

6) Letter from C. Gratton (U.S. Nuclear Regulatory Commission) to M. J. Pacilio (Exelon Nuclear), "LaSalle County Station, Units 1 and 2 – Issuance of Amendments Re: Application of Alternative Source Term (TAC Nos. ME0068 and ME0069," dated September 6, 2010 (ADAMS Accession No. ML101750625)

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Supplemental Information

The following information is provided for the purposes of correction and clarification.

- The maximum allowable primary leakage containment leakage rate, L_a, changed from 0.635 percent to 1.0 percent with the approval of Alternative Source Term (AST) on September 6, 2010 (Reference 6).

  Post - AST

  - The leakage acceptance value, L_a is equal to 1.0 % of containment air weight per day (Reference TS 5.5.13, "Primary Containment Leakage Rate Testing Program").

  - L_a is currently equivalent to 640.4 standard cubic ft per hour (SCFH). This value was calculated using Attachment B of EGC program procedure LTS-300-4, Revision 29, "Unit 1(2) Primary Containment Integrated Leak Rate Test (ILRT)."

  - 0.6 L_a is currently equal to 384.2 SCFH. This value was calculated based on the L_a value given in EGC program procedure LTS-300-4, Revision 29.

  - An administrative limit for 0.6 L_a (i.e., less than 384.2 SCFH) is utilized by LSCS for the Type B and C tests. This administrative limit is used for the purpose of providing operating margin below the 0.6 L_a value of 384.2 SCFH.

  Pre - AST

  - Prior to the implementation of AST at LSCS, L_a was equal to 0.635 % of containment air weight per day (Reference 6).

  - Prior to the implementation of AST at LSCS, L_a was equivalent to 387.8 SCFH. This value was calculated using Attachment B of EGC program procedure LTS-300-4, Revision 26, "Unit 1(2) Primary Containment Integrated Leak Rate Test (ILRT)."

  - Prior to the implementation of AST at LSCS, 0.6 L_a was equal to 232.7 SCFH. This value was calculated based on the L_a value given in EGC program procedure LTS-300-4, Revision 26.

  - Prior to the implementation of AST at LSCS, an administrative limit for 0.6 L_a (i.e., less than 232.7 SCFH) was utilized by LSCS for the purpose of providing operating margin below the 0.6 L_a value of 232.7 SCFH.

- The percentages shown in Tables 3.4.5-1 and 3.4.5-2 of Reference 1 were originally calculated using the administrative limits for 0.6 L_a that were applicable at the time of the tests. The administrative limits for 0.6 L_a have changed over time due to engineering judgement.

ATTACHMENT
Supplemental Information

As shown below, Tables 3.4.5-1 and 3.4.5-2 of Reference 1 have been updated to present the data based on the actual 0.6 L_a values applicable at the time rather than the administrative limits. This summary demonstrates a history of satisfactory Type B and Type C tested components performance from 2005 through 2016 for LSCS, Units 1 and 2.

Table 3.4.5-1 – LCSC Unit 1 Type B and C LLRT Combined As-Found/As-Left Trend Summary

	Pre-AST [1]			Post-AST [2]		
RFO	2006	2008	2010	2012	2014	2016
	L1R11	L1R12	L1R13	L1R14	L1R15	L1R16
AF Min Path (SCFH)	122.01	88.98	106.54	104.31	115.88	169.34
Fraction of 0.6 La	52.43%	38.24%	45.78%	27.15%	30.16%	44.08%
AL Max Path (SCFH)	145.81	160.06	187.49	206.39	192.03	221.08
Fraction of 0.6 La	62.66%	68.78%	80.57%	53.72%	49.98%	57.54%
AL Min Path (SCFH)	80.79	78.21	72.25	101.23	115.55	112.97
Fraction of 0.6 La	34.72%	33.61%	31.05%	26.35%	30.08%	29.40%

Note 1: Prior to the implementation of AST at LSCS, 0.6 L_a was equal to 232.7 SCFH.
Note 2: 0.6 L_a is currently equal to 384.2 SCFH.

Table 3.4.5-2 – LCSC Unit 2 Type B and C LLRT Combined As-Found/As-Left Trend Summary

	Pre-AST [1]			Post-AST [2]		
RFO	2005	2007	2009	2011	2013	2015
	L2R10	L2R11	L2R12	L2R13	L2R14	L2R15
AF Min Path (SCFH)	106.9	56.61	85.17	92.56	110.37	148.72
Fraction of 0.6 La	45.94%	24.33%	36.60%	24.09%	28.73%	38.71%
AL Max Path (SCFH)	173.17	125.11	136.35	150.35	160.93	214.14
Fraction of 0.6 La	74.42%	53.76%	58.59%	39.13%	41.89%	55.74%
AL Min Path (SCFH)	73.99	55.8	62.25	77.14	73.38	117.98
Fraction of 0.6 La	31.80%	23.98%	26.75%	20.08%	19.10%	30.71%

Note 1: Prior to the implementation of AST at LSCS, 0.6 L_a was equal to 232.7 SCFH.
Note 2: 0.6 L_a is currently equal to 384.2 SCFH.