

RS-06-118

10 CFR 50.90

August 24, 2006

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D. C. 20555

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

Subject: Additional Information Supporting the License Amendment Request
Associated With Direct Current Electrical Power

- References: 1. Letter from K. R. Jury (Exelon Generation Corporation, LLC) to U.S. NRC, "Request for an Amendment to Technical Specifications Associated With Direct Current Electrical Power," dated December 9, 2004
2. U.S. NRC to C. M. Crane (Exelon Generation Company, LLC), "LaSalle County Power Station, Units 1 and 2 – Request for Additional Information Related to Request for Amendment to Technical Specifications Associated With Direct Current Electrical Power," dated June 2, 2006
3. Letter from D. M. Benyak (Exelon Generation Corporation, LLC) to U.S. NRC, "Additional Information Supporting the License Amendment Request Associated With Direct Current Electrical Power," dated August 16, 2006

In Reference 1, Exelon Generation Company, LLC, (EGC), requested an amendment to Appendix A, Technical Specifications (TS), of Facility Operating License Nos. NPF-11 and NPF-18 for LaSalle County Station (LSCS) Units 1 and 2 respectively. Specifically, the proposed changes were to modify TS Sections 3.8.4, "DC Sources - Operating," 3.8.5, "DC Sources - Shutdown," 3.8.6, "Battery Cell Parameters," and 5.5, "Programs and Manuals." The proposed changes also requested new actions for an inoperable battery charger and alternate battery charger testing criteria for Limiting Condition for Operation (LCO) 3.8.4 and 3.8.5.

The proposed changes also included the relocation of a number of Surveillance Requirements (SRs) in TS Section 3.8.4 that perform preventive maintenance on the safety related batteries to a licensee-controlled program. It was proposed that TS Table 3.8.6-1, "Battery Cell Parameter Requirements," be relocated to a licensee-controlled program, and specific actions with associated completion times for out-of-limits conditions for battery cell voltage, electrolyte level, and electrolyte temperature be added to TS Section 3.8.6. In addition, specific SRs were proposed for verification of these parameters.

A new program was also proposed for the maintenance and monitoring of station batteries based on the recommendations of Institute of Electrical and Electronics Engineers (IEEE) Standard 450-1995, "IEEE Recommended Practice for Maintenance, Testing, and Replacement of Vented Lead-Acid Batteries for Stationary Applications." The items relocated would be contained within this new program.

In Reference 2, the NRC requested additional information to complete the review of the license amendment. Question 7 of Reference 2 requested clarification on the proposed SR 3.8.6.6 regarding the battery performance test in the subject unit and why the proposed SR 3.8.6.6 is not required to be performed when the opposite unit is in Mode 4 or 5, or during movement of irradiated fuel in the secondary containment.

NOTE 2 of the proposed SR 3.8.6.6 was intended to be editorial and relocated from part of the current TS SR 3.8.4.9 (i.e., the NOTE in the current TS SR 3.8.4.9 refers to TS SR 3.8.4.8 that is proposed to be relocated to the new SR 3.8.6.6) and the current TS SR 3.8.5.1 (i.e., SR 3.8.4.8 was not required to be performed).

As stated in Reference 3, (i.e., the response to question 7), to address this issue and to clarify and correct the information provided in Reference 1, the proposed SR 3.8.6.6 NOTE 2 has been revised and divided into NOTE 2 and NOTE 3.

The additional proposed NOTE(s) 2 and 3 of SR 3.8.6.6 are required for completeness and there are no changes in the proposed SR 3.8.6.6 from the current LSCS TS. The justification (i.e., item 6 on page 19 of Reference 1) is still applicable with the exception of the reference to NOTE 2 is now revised to NOTE(s) 2 and 3.


In a teleconference on August 14, 2006, Ms. Alison Mackellar of EGC notified Mr. Stephen P. Sands of the NRC regarding the issue. A corrected TS mark-up page and retyped TS page are provided in Attachments 1 and 2. The associated corrected TS Bases page is provided in Attachment 3. The TS Bases page is provided for information only and does not require NRC approval.

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 does not involve a significant hazards consideration.

There are no regulatory commitments contained in this letter. Should you have any questions concerning this letter, please contact Ms. Alison Mackellar at (630) 657-2817.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 24th day of August 2006.

Respectfully,

A handwritten signature in dark ink, appearing to read "Darin M Benyak", with a long horizontal flourish extending to the right.

Darin M. Benyak
Manager, Licensing and Regulatory Affairs

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Attachment 1: Revised Technical Specification Markup Page for SR 3.8.6.6
Attachment 2: Revised Technical Specification Retyped Page for SR 3.8.6.6
Attachment 3: Revised Technical Specification Bases Page for SR 3.8.6.6

ATTACHMENT 1

**LaSalle County Station
Facility Operating License Nos. NPF-11 and NPF-18**

Revised Technical Specification Markup Page for SR 3.8.6.6

TS page 3.8.4-5

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
<p>SR 3.8.4-8^{6.6} -----NOTES-----</p> <p>1. This Surveillance shall not normally be performed in MODE 1 or 2 for the 125 VDC batteries. However, portions of the Surveillance may be performed to reestablish OPERABILITY provided an assessment determines the safety of the plant is maintained or enhanced. Credit may be taken for unplanned events that satisfy this SR.</p> <p>Verify battery capacity is $\geq 80\%$ of the manufacturer's rating when subjected to a performance discharge test or a modified performance discharge test.</p> <p>2. In MODE 1, 2 or 3, and the opposite unit in MODE 4 or 5, or moving irradiated fuel in the secondary containment, this Surveillance is not required to be performed for the opposite unit Division 2 DC electrical power subsystem</p> <p>3. In MODE 4, 5 or during movement of irradiated fuel in Mode 4, 5 or defueled, this Surveillance is not required to be performed.</p>	<p>60 months</p> <p><u>AND</u></p> <p>12 months when battery shows degradation or has reached 85% of expected life with capacity $< 100\%$ of manufacturer's rating</p> <p><u>AND</u></p> <p>24 months when battery has reached 85% of the expected life with capacity $\geq 100\%$ of manufacturer's rating</p>

(continued)

ATTACHMENT 2

**LaSalle County Station
Facility Operating License Nos. NPF-11 and NPF-18**

Revised Technical Specification Retyped Page for SR 3.8.6.6

TS page 3.8.6-4

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
<p>SR 3.8.6.6 -----NOTES-----</p> <ol style="list-style-type: none"> 1. This Surveillance shall not normally be performed in MODE 1 or 2 for the 125 VDC batteries. However, portions of the Surveillance may be performed to reestablish OPERABILITY provided an assessment determines the safety of the plant is maintained or enhanced. Credit may be taken for unplanned events that satisfy this SR. 2. In MODE 1, 2 or 3, and the opposite unit in MODE 4 or 5, or moving irradiated fuel in the secondary containment, this Surveillance is not required to be performed for the opposite unit Division 2 DC electrical power subsystem. 3. In MODE 4, 5 or during movement of irradiated fuel in the secondary containment in Mode 4, 5 or defueled, this Surveillance is not required to be performed. <p>-----</p> <p>Verify battery capacity is $\geq 80\%$ of the manufacturer's rating when subjected to a performance discharge test or a modified performance discharge test.</p>	<p>60 months</p> <p><u>AND</u></p> <p>12 months when battery shows degradation or has reached 85% of expected life with capacity $< 100\%$ of manufacturer's rating</p> <p><u>AND</u></p> <p>24 months when battery has reached 85% of the expected life with capacity $\geq 100\%$ of manufacturer's rating</p>

ATTACHMENT 3

**LaSalle County Station
Facility Operating License Nos. NPF-11 and NPF-18**

Revised Technical Specification Bases Page for SR 3.8.6.6

TS Bases page B 3.8.6-10

BASES (continued)

partial Surveillance, a successful partial Surveillance, and a perturbation of the offsite or onsite system when they are tied together or operated independently for the partial Surveillance; as well as the operator procedures available to cope with these outcomes. These shall be measured against the avoided risk of a plant shutdown and startup to determine that plant safety is maintained or enhanced when portions of the Surveillance are performed in MODE 1 or 2. Risk insights or deterministic methods may be used for this assessment. Credit may be taken for unplanned events that satisfy this SR.

The reason for the second Note is if the opposite unit is in MODE 4 or 5, or moving irradiated fuel assemblies in secondary containment, this Surveillance is not required to be performed for an operating unit. This ensures that a given operating unit SR will not require an opposite unit SR to be performed, when the opposite unit Technical Specifications exempts performance of an opposite unit SR. Furthermore, it precludes requiring the OPERABLE DC source on the shutdown unit from being discharged below its capability to provide the required power supply or otherwise be rendered inoperable during the performance of this Surveillance. It is the intent that this SR must still be capable of being met, but actual performance is not required.

The reason for the third Note is to preclude requiring the OPERABLE DC sources on the shutdown unit from being discharged below their capability to provide the required power supply or otherwise be rendered inoperable during the performance of this SR. It is the intent that this SR must still be capable of being met, but actual performance is not required.

REFERENCES

1. UFSAR, Chapter 6.
2. UFSAR, Chapter 8.
3. UFSAR, Chapter 15.
4. IEEE Standard 450, 1995.
5. IEEE Standard 485, 1983.
6. Technical Requirements Manual