

RS-15-081

April 27, 2015

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

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: Report of Full Compliance with March 12, 2012 Commission Order Modifying Licenses
with Regard to Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051)

References:

1. NRC Order Number EA-12-051, "Issuance of Order to Modify Licenses with Regard to Reliable Spent Fuel Pool Instrumentation," dated March 12, 2012
2. NRC Interim Staff Guidance JLD-ISG-2012-03, "Compliance with Order EA-12-051, Reliable Spent Fuel Pool Instrumentation," Revision 0, dated August 29, 2012
3. NEI 12-02, Industry Guidance for Compliance with NRC Order EA-12-051, "To Modify Licenses with Regard to Reliable Spent Fuel Pool Instrumentation," Revision 1, dated August 2012
4. Exelon Generation Company, LLC's Initial Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Requirements for Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051), dated October 25, 2012
5. Exelon Generation Company, LLC Overall Integrated Plan in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051), dated February 28, 2013 (RS-13-031)
6. NRC letter to Exelon Generation Company, LLC, Request for Additional Information Regarding Overall Integrated Plan for Reliable Spent Fuel Pool Instrumentation, dated June 7, 2013
7. Exelon Generation Company, LLC letter to NRC, Response to Request For Additional Information - Overall Integrated Plan in Response to Commission Order Modifying License Requirements for Reliable Spent Fuel Pool Instrumentation (Order EA-12-051), dated July 3, 2013 (RS-13-158)
8. Exelon Generation Company, LLC First Six-Month Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051), dated August 28, 2013 (RS-13-120)

9. Exelon Generation Company, LLC Second Six-Month Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051), dated February 28, 2014 (RS-14-021)
10. Exelon Generation Company, LLC Third Six-Month Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051), dated August 28, 2014 (RS-14-199)
11. Exelon Generation Company, LLC Fourth Six-Month Status Report in Response to March 12, 2012 Commission Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051), dated February 27, 2015 (RS-15-029)
12. NRC letter to Exelon Generation Company, LLC, LaSalle County Station, Units 1 and 2 – Interim Staff Evaluation and Request for Additional Information Regarding the Overall Integrated Plan for Implementation of Order EA-12-051, Reliable Spent Fuel Pool Instrumentation (TAC Nos. MF1119 and MF1120), dated November 26, 2013
13. NRC letter to Exelon Generation Company, LLC, LaSalle County Station, Units 1 and 2 – Report for the Onsite Audit Regarding Implementation of Mitigating Strategies and Reliable Spent Fuel Pool Instrumentation Related to Orders EA-12-049 and EA-12-051 (TAC Nos. MF1119, MF1120, MF1121, and MF1122), dated March 23, 2015

On March 12, 2012, the Nuclear Regulatory Commission (“NRC” or “Commission”) issued Order EA-12-051, “Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation,” (Reference 1) to Exelon Generation Company, LLC (EGC). Reference 1 was immediately effective and directed EGC to install reliable spent fuel pool level instrumentation. Specific requirements are outlined in Attachment 2 of Reference 1.

Reference 1 required submission of an initial status report 60 days following issuance of the final interim staff guidance (Reference 2) and an overall integrated plan (OIP) pursuant to Section IV, Condition C. Reference 2 endorsed industry guidance document NEI 12-02, Revision 1 (Reference 3) with clarifications and exceptions identified in Reference 2. Reference 4 provided the EGC initial status report regarding reliable spent fuel pool instrumentation. Reference 5 provided the LaSalle County Station, Units 1 and 2 OIP.

Reference 1 required submission of a status report at six-month intervals following submittal of the OIP. References 8, 9, 10, and 11 provided the first, second, third, and fourth six-month status reports, respectively, pursuant to Section IV, Condition C.2, of Reference 1 for LaSalle County Station.

The purpose of this letter is to provide the report of full compliance with the March 12, 2012 Commission Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation (Order Number EA-12-051) (Reference 1) pursuant to Section IV, Condition C.3 of the Order for LaSalle County Station, Units 1 and 2.

LaSalle County Station has installed two independent full scale level monitors for the Spent Fuel Pool (SFP) in response to Order EA-12-051. LaSalle County Station OIP Open Items have been addressed and closed as documented in References 8, 9, 10, and 11, and are considered complete pending NRC Closure. The information provided herein documents full compliance for LaSalle County Station, Units 1 and 2 with Reference 1.

EGC's response to the NRC OIP Requests for Additional Information (OIP RAIs), and the NRC Interim Staff Evaluation (ISE) Open Items (ISE RAIs) identified in References 6 and 12 have been addressed and closed as documented in References 7, 8, 9, 10, and 11, and below, and are considered complete pending NRC Closure. The following table provides completion references for each NRC OIP RAI and ISE RAI.

OIP Open Item No. 1	Reference 8
OIP RAI Nos. 1, 2	Reference 7
OIP RAI Nos. 3, 4, 5, 6, 7, 8a, 8b, 8d, 9, 10, 11a	Reference 10
OIP RAI No. 8c	Reference 10 and updated with this submittal as provided below
OIP RAI Nos. 11b, 11c	References 10 and 11
ISE RAI Nos. 1, 3, 4, 11, 12	References 10
ISE RAI No. 6	References 10 and 11

Note: ISE RAIs are not duplicated in the table above if previously issued as OIP RAIs in Reference 6.

EGC's response to the NRC audit questions and any additional audit open items have been addressed and closed as documented in the NRC Site Audit Report (Reference 13). Reference 13 contains no remaining audit open items regarding LaSalle County Station's compliance with NRC Order EA-12-051.

The table below documents the completion of the final remaining open action as identified in Reference 11. As stated above, EGC provides the response for the following item and considers it to be complete for LaSalle County Station.

Item	Description	Reference
OIP Item 9 (RAI-8, Ref. 6) c) A description of how functional checks will be performed, and the frequency at which they will be conducted. Describe how calibration tests will be performed, and the frequency at which they will be conducted. Provide a discussion as to how these surveillances will be	c) The LaSalle functional test and calibration are combined in the same procedure(s) (LIP-FC-501 for U1 and LIP-FC-601 for U2). Each Spent Fuel Pool Level Indicating System (Primary/Backup) has its own procedure. The LaSalle procedures are associated with a preventive maintenance task that establishes the required performance of both procedures 60 days prior to a scheduled refueling outage on either unit. These procedures are based on the Westinghouse Two Point Verification Method and WNA-TP-04709-GEN Spent Fuel Pool Instrument System Calibration Procedure. LaSalle procedures establish the current water level by measuring the distance	<u>Complete</u>

incorporated into the plant surveillance program.	to the water referenced from the bottom of the launch plate. This distance is compared to the level indication to obtain the As-Found indication value. The probe is then lifted out of the water to a predetermined mark on the probe. The water level at the predetermined mark is then recorded. The probe is lowered back into the water freely suspended from the launch plate. The level indication is recorded. If all three As-Found Level indications are within the tolerance specified, the procedures are exited. If the As-Found values are not within tolerance, the calibration is performed to bring the indication within the calibration requirements. The calibration steps of the LaSalle procedures were taken from Westinghouse document WNA-TP-04709-GEN Spent Fuel Pool Instrument System Calibration Procedure.	
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MILESTONE SCHEDULE – ITEMS COMPLETE

Milestone	Completion Date
Submit 60 Day Status Report	October 25, 2012
Submit Overall Integrated Plan	February 28, 2013
Submit Responses to RAIs	July 3, 2013
Submit 6 Month Updates:	
Update 1	August 28, 2013
Update 2	February 28, 2014
Provide Final Safety Evaluation (SE) Information	March 31, 2014
Update 3	August 28, 2014
Update 4	February 27, 2015
Modifications:	
Conceptual Design	3Q2012
Begin Detailed Design Engineering	2Q2013
Issue Exelon Fleet contract to procure SFPI Equipment	4Q2013
Complete and Issue SFPI Modification Package	2Q2014
Begin Installation	3Q2014
Complete SFPI Installation and Put Into Service	February 26, 2015

ORDER EA-12-051 COMPLIANCE ELEMENTS SUMMARY

The elements identified below for LaSalle County Station, as well as the site overall integrated plan response submittal (Reference 5), the 6-Month Status Reports (References 8, 9, 10, and 11), and any additional docketed correspondence, demonstrate compliance with Order EA-12-051.

IDENTIFICATION OF LEVELS OF REQUIRED MONITORING - COMPLETE

LaSalle County Station has identified the three required levels for monitoring SFP level in compliance with Order EA-12-051. These levels have been integrated into the site processes for monitoring level during events and responding to loss of SFP inventory.

INSTRUMENT DESIGN FEATURES - COMPLETE

The design of the instruments installed at LaSalle County Station complies with the requirements specified in the Order and described in NEI 12-02 "Industry Guidance for Compliance with NRC Order EA-12-051". The instruments have been installed in accordance with the station design control process.

The instruments have been arranged to provide reasonable protection against missiles. The instruments have been mounted to retain design configuration during and following the maximum expected ground motion. The instruments will be reliable during expected environmental and radiological conditions when the SFP is at saturation for extended periods. The instruments are independent of each other and have separate and diverse power supplies. The instruments will maintain their design accuracy following a power interruption and are designed to allow for routine testing and calibration.

The instrument display is readily accessible during postulated events and allows for SFP level information to be promptly available to decision makers.

PROGRAM FEATURES - COMPLETE

Training for LaSalle County Station, Units 1 and 2 has been completed in accordance with an accepted training process as recommended in NEI 12-02, Section 4.1.

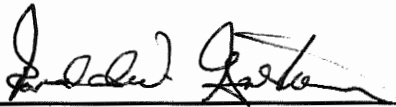
Operating and maintenance procedures for LaSalle County Station have been developed and integrated with existing procedures. Procedures have been verified and are available for use in accordance with the site procedure control program.

Site processes have been established to ensure the instruments are maintained at their design accuracy.

This letter contains no new regulatory commitments. If you have any questions regarding this report, please contact David P. Helker at 610-765-5525.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 27th day of April 2015.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Ronald W. Gaston", written over a horizontal line.

Ronald W. Gaston
Manager - Licensing & Regulatory Affairs
Exelon Generation Company, LLC

cc: Director, Office of Nuclear Reactor Regulation
NRC Regional Administrator - Region III
NRC Senior Resident Inspector – LaSalle County Station, Units 1 and 2
NRC Project Manager, NRR – LaSalle County Station, Units 1 and 2
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