UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

June 19, 2015

Mr. Michael P. Gallagher
Vice President, License Renewal Projects
Exelon Generation Company, LLC
200 Exelon Way
Kennett Square, PA 19348

SUBJECT: REQUESTS FOR ADDITIONAL INFORMATION FOR THE REVIEW OF THE LASALLE COUNTY STATION, UNITS 1 AND 2 LICENSE RENEWAL APPLICATION – SET 4 (TAC NOS. MF5347 AND MF5346)

Dear Mr. Gallagher:

By letter dated December 9, 2014, Exelon Generation Company, LLC (Exelon) submitted an application pursuant to Title 10 of the *Code of Federal Regulations* Part 54, to renew the operating licenses NPF-11 and NPF-18 for LaSalle County Station (LSCS), Units 1 and 2, respectively. The staff of the U.S. Nuclear Regulatory Commission (NRC or the staff) is reviewing the information contained in the license renewal application and has identified, in the enclosure, areas where additional information is needed to complete the review.

These requests for additional information were discussed with Mr. John Hufnagel, and a mutually agreeable date for the response is within 30 days from the date of this letter. If you have any questions, please contact me at 301-415-3019 or by e-mail at Jeffrey.Mitchell2@nrc.gov.

Sincerely,

/RA/

Jeffrey S. Mitchell, Project Manager
Projects Branch 1
Division of License Renewal
Office of Nuclear Reactor Regulation

Docket Nos. 50-373 and 50-374

Enclosure:
As stated

cc: Listserv

June 19, 2015

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200 Exelon Way
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LASALLE COUNTY STATION, UNITS 1 AND 2
LICENSE RENEWAL APPLICATION
REQUESTS FOR ADDITIONAL INFORMATION – SET 4
(TAC NOS. MF5347 AND MF5346)

RAI B.2.1.29-1

Background:

Title 10 of the *Code of Federal Regulations* (10 CFR) Section 54.21(a)(3), requires the applicant to demonstrate that the effects of aging for structures and components will be adequately managed so that the intended function(s) will be maintained consistent with the current licensing basis (CLB) for the period of extended operation (PEO). As described in the Standard Review Plan for License Renewal (SRP-LR), an applicant may demonstrate compliance with 10 CFR 54.21(a)(3) by referencing the Generic Aging Lessons Learned (GALL) Report when evaluation of the matter in the GALL Report applies to the plant.

License renewal application (LRA) Section B.2.1.29 states that the ASME Section XI, Subsection IWE aging management program (AMP) with enhancements will be consistent with the ten elements of the GALL Report AMP XI.S1, "ASME Section XI, Subsection IWE," specified in NUREG-1801. The Detection of Aging Effects program element recommends that the program be augmented to require surface examination, in addition to visual examination, to detect cracking in stainless steel penetration sleeves, dissimilar metal welds, bellows; and steel components that are subject to cyclic loading but have no CLB fatigue analysis. This program element also states that, where feasible, Appendix J tests (GALL Report AMP XI.S4) may be performed in lieu of surface examination. This AMP recommendation is also related to GALL Report line item II.B4.CP-38, associated with SRP-LR Table 3.5-1, item 10, which recommends further evaluation specifically of the adequacy of the detection of aging effects with regard to stress corrosion cracking of stainless steel and dissimilar metal welds of penetration sleeves and penetration bellows.

During the license renewal AMP audit, the staff noted that the Detection of Aging Effects program element in the LRA AMP basis document (LA-PBD-AMP-XI.S1, Revision 1, Section 3.4) states that the “primary containment penetration sleeves are carbon steel and stainless steel IWE pressure boundary surfaces including containment sleeves and associated welds are subject to Appendix J tests which are performed in addition to visual IWE examinations.”

Issue:

It is not clear to the staff that the Detection of Aging Effects program element is consistent with the GALL Report because the LRA AMP basis document does not state that supplemental surface examinations will be performed, in addition to visual examinations, to detect cracking in stainless steel penetration sleeves, or dissimilar metal welds. Further, if the option to perform Appendix J tests in lieu of surface examinations will be used for any of the mentioned components, the basis document does not mention the type of Appendix J test that would be performed for the specific components in order for the Nuclear Regulatory Commission (NRC) staff to evaluate the appropriateness of the test to detect cracking in these components.

ENCLOSURE

Request:

1. State whether the supplemental surface examinations recommended in GALL Report AMP XI.S1 will be performed to detect cracking in stainless steel and dissimilar metal welds of penetration sleeves. If supplemental surface examination will be performed, indicate what standard will be used to perform surface examination of these stainless steel and dissimilar metal welds.
2. If an Appendix J test is used in lieu of supplemental surface examinations, indicate the type of Appendix J test that will be used for the applicable components and justify its appropriateness to detect cracking prior to loss of intended function.
3. If supplemental examinations will not be performed, or supplemental examination methods other than those described in GALL Report AMP XI.S1 will be used, describe and justify the exception to GALL Report AMP XI.S1.

RAI B.2.1.29-2

Background:

Section 54.21(a)(3) of 10 CFR requires applicants to demonstrate that the effects of aging for structures and components will be adequately managed so that the intended function(s) will be maintained consistent with the CLB for the PEO. As described in the SRP-LR, an applicant may demonstrate compliance with 10 CFR 54.21(a)(3) by referencing the GALL Report when evaluation of the matter in the GALL Report applies to the plant. LRA Section B.2.1.29 states that the ASME Section XI, Subsection IWE AMP with enhancements will be consistent with the ten elements of GALL Report AMP XI.S1, "ASME Section XI, Subsection IWE," specified in NUREG-1801.

The Operating Experience section of LRA AMP B.2.1.29, "ASME Section XI, Subsection IWE," discusses leakage from the reactor cavity pool drain line welds at the interface with the cavity pool liner which has been observed as seepage through the surrounding concrete. The LRA AMP provides an enhancement to the Monitoring and Trending program element to perform periodic ultrasonic thickness (UT) measurements of the containment liner in the vicinity of the leakage while the leakage persists. As stated in the SRP-LR, the staff reviewed the applicant's programs for consistency with those described in the GALL Report and with plant-specific operating experience during the performance of an AMP audit.

Issue:

During the license renewal AMP audit, the NRC staff reviewed an action request (AR) report (LaSalle AR Report 02447966) from the Unit 2, 2015 refueling outage. The report identified indications of reactor cavity leakage in a different location from where it has been historically identified.

Request:

Explain, with sufficient technical detail, how the existing LRA AMP B.2.1.29 with the associated enhancement, is adequate to address the impact of the new operating experience on the

potential for loss of material due to corrosion of the containment liner, or propose a new/revised enhancement to address the operating experience. Explain whether the proposed UT location is adequate to address the newly identified leakage location, or if additional UT locations will be necessary.

RAI B.2.1.31-1

Background:

Section 54.21(a)(3) of 10 CFR requires applicants to demonstrate that the effects of aging will be adequately managed so that intended functions will be maintained consistent with the CLB during the PEO. As described in the SRP-LR, an applicant may demonstrate compliance with 10 CFR 54.21(a)(3) by referencing the GALL Report when evaluation of the matter in the GALL Report applies to the plant.

LRA Section B.2.1.31 states that the ASME Section XI, Subsection IWF program is an existing AMP with enhancements that will be consistent with the program elements in GALL Report AMP XI.S3, "ASME Section XI, Subsection IWF." The Preventive Action program element of the LRA AMP provides an enhancement (Enhancement 1; LR Commitment No. 31, item 1) in order to become consistent with the corresponding GALL Report program element. This enhancement states in part that, prior to the PEO, the program will be enhanced to:

> Provide guidance for proper specification of bolting material, storage, lubricant and sealants, and installation torque or tension to prevent or mitigate degradation and failure of structural bolting. Requirements for high strength bolts shall include the preventive actions for storage, lubricants and stress corrosion cracking potential discussed in Section 2 of RCSC (Research Council on Structural Connections) publication "Specification for Structural Joints Using ASTM A325 or A490 Bolts.

The Preventive Action program element in the GALL Report AMP XI.S3 also includes a recommendation for using bolting material that has an actual measured yield strength less than 150 ksi or 1,034 MPa, intended as a preventive measure against the potential for stress corrosion cracking (SCC). During the audit, the staff noted that Section 3.2, "Preventive Actions," in the LRA program basis document (LA-PBD-XI.S3, Revision 4) states that high strength bolting (actual measured yield strength greater than or equal to 150 ksi or 1,034 MPa) in sizes greater than 1 inch nominal diameter are not used in LaSalle County Station, Units 1 and 2 IWF supports. The staff also noted that, on the basis of the previous statement, the Detection of Aging Effects program element in Section 3.4 of the applicant's program basis document does not include the supplemental volumetric examination recommended in the Detection of Aging Effects program element of the GALL Report AMP to detect cracking due to SCC. This supplemental volumetric examination recommendation is specifically for high strength bolting (actual measured yield strength greater than or equal to 150 ksi or 1,034 MPa) in sizes greater than 1 inch nominal diameter.

Issue:

It is not clear if Enhancement 1 (LR Commitment No. 31, item 1) is consistent with the Preventive Action program element of the GALL Report AMP XI.S3, with regard to the recommendation related to the use of bolting material that has an actual measured yield strength less than 150 ksi or 1,034 MPa. Specifically, since the enhancement does not prevent future use of high strength bolting material (actual measured yield strength greater than or equal to 150 ksi or 1,034 MPa) in sizes greater than 1 inch nominal diameter, that are susceptible to SCC, and the LRA AMP has no provisions for recommended supplemental volumetric examination of such bolting, this aspect of the Preventive Action program element of the LRA AMP appears to be not consistent with the GALL Report AMP.

Request:

1. Clarify how Enhancement 1 (LR Commitment No. 31, item 1) to the Preventive Action program element of the LRA AMP B.2.1.31, "ASME Section XI, Subsection IWF," is consistent with the corresponding program element recommendation of the GALL Report AMP XI.S3, specifically with regard to the future use of high strength bolting (actual measured yield strength greater than or equal to 150 ksi or 1,034 MPa) in sizes greater than 1 inch nominal diameter for IWF supports, considering that such bolting is susceptible to SCC and the LRA AMP has no provisions for recommended supplemental volumetric examination to detect cracking if used in the future.
2. If criteria other than that described in the GALL Report are being used, provide the basis to justify the adequacy of the proposed exception to manage aging effects on high strength bolting (actual measured yield strength greater than or equal to 150 ksi) in sizes greater than 1 inch nominal diameter for IWF supports.

RAI B.2.1.33-1

Background:

Section 54.21(a)(3) of 10 CFR requires applicants to demonstrate that the effects of aging will be adequately managed so that intended functions will be maintained consistent with the CLB during the PEO. As described in the SRP-LR, an applicant may demonstrate compliance with 10 CFR 54.21(a)(3) by referencing the GALL Report when evaluation of the matter in the GALL Report applies to the plant.

LRA Section B.2.1.33 states that the Masonry Walls program is an existing AMP with enhancements that will be consistent with the program elements in the GALL Report AMP XI.S5, "Masonry Walls." The LRA AMP includes an enhancement (Enhancement 1; LR Commitment No. 33, item 1) applicable to the Parameters Monitored or Inspected, and Acceptance Criteria program elements in order to become consistent with the corresponding GALL Report program elements. This enhancement states that, prior to the PEO, the program will be revised to "provide guidance for inspection of masonry walls for separation and gaps between the supports for masonry walls." The Parameters Monitored or Inspected program element of the GALL Report AMP XI.S5 states that "[t]he primary parameters monitored are potential shrinkage and/or separation and cracking of masonry walls and gaps between the

supports and masonry walls that could impact the intended function or potentially invalidate its evaluation basis."

Issue:

It is not clear that Enhancement 1 (LR Commitment No. 33, item 1), applicable to the Parameters Monitored or Inspected, and Acceptance Criteria program elements of LRA AMP B.2.1.33, is adequate to establish consistency with the GALL Report AMP with regard to monitoring for gaps between supports and masonry walls. In this regard, the critical parameters intended to be monitored, as provided in the GALL Report AMP, are gaps between the masonry walls and component supports (i.e., supports for safety-related systems or components that are located in close proximity to or have attachments to the walls, or edge supports that establish boundary conditions used in the design analysis of the walls) to ensure that intended function and/or evaluation basis of the masonry wall is not adversely impacted. This is different from the parameter described as "gaps between the supports for masonry walls" in the LRA AMP enhancement.

Request:

1. Clarify how the enhancement for the Parameters Monitored or Inspected, and Acceptance Criteria program elements of LRA AMP B.2.1.33 is consistent with the parameters and criteria described in the GALL Report AMP XI.S5 with regard to monitoring for gaps between supports and masonry walls.
2. If parameters or criteria other than that described in the GALL Report are being used, provide the basis to justify the adequacy of the proposed exception to manage the aging effects to masonry walls.

RAI B.2.1.34-1

Background:

Section 54.21(a)(3) of 10 CFR requires applicants to demonstrate that the effects of aging for structures and components will be adequately managed so that the intended function(s) will be maintained consistent with the CLB for the PEO. As described in SRP-LR, an applicant may demonstrate compliance with 10 CFR 54.21(a)(3) by referencing the GALL Report when evaluation of the matter in the GALL Report applies to the plant.

LRA Section B.2.1.34 states that the Structures Monitoring program, with enhancements, will be consistent with the ten program elements of GALL Report AMP XI.S6, "Structures Monitoring."

The Detection of Aging Effects program element of GALL Report AMP XI.S6 recommends the following for inaccessible below-grade structural elements of plants with non-aggressive groundwater/soil environment:

a) evaluating the acceptability of inaccessible areas when conditions exist in accessible areas that could indicate the presence of, or result in, degradation to such inaccessible areas, and

b) examining representative samples of the exposed portions of the below grade concrete, when excavated for any reason.

During the license renewal AMP audit, the staff noted that the Detection of Aging Effects program element in the LRA AMP basis document (LA-PBD-AMP-XI.S6, Revision 3, Section 3.4e) states:

> The existing Structures Monitoring and excavation procedures will be enhanced to require monitoring of buried concrete by (a) evaluation of the acceptability of inaccessible areas when conditions exist in accessible areas that could indicate the presence of, or result in, degradation to such inaccessible areas, and (b) examination of representative samples of the exposed portions of the below grade concrete, when excavated for any reason.

However, the enhancement in LRA Section B.2.1.34 (Enhancement 7; LR Commitment No. 34, item 7) only addresses item (b) of the GALL Report recommendations stated above.

Issue:

It is not clear to the staff that the LRA contains adequate enhancements for the Detection of Aging Effects program element to address consistency with both recommendations, (a) and (b), from the GALL Report AMP XI.S6 as noted above.

Request:

1. Clarify how the enhancement for the Detection of Aging Effects program element is consistent with that described in the GALL Report AMP XI.S6 for managing aging effects in inaccessible areas exposed to non-aggressive ground water/soil environment.
2. If criteria other than that described in the GALL Report are being used, provide the basis to justify the adequacy of the proposed exception to manage the aging effects in inaccessible areas.

RAI B.2.1.34-2

Background:

Section 54.21(a)(3) of 10 CFR requires applicants to demonstrate that the effects of aging for structures and components will be adequately managed so that the intended function(s) will be maintained consistent with the CLB for the PEO. As described in SRP-LR, an applicant may demonstrate compliance with 10 CFR 54.21(a)(3) by referencing the GALL Report when evaluation of the matter in the GALL Report applies to the plant.

Enhancement 1 (LR Commitment No. 34, item 1) of the LRA Structures Monitoring AMP (LRA Section B.2.1.34) adds the plant-specific component type “permanent drywell shielding” to the scope of the Structures Monitoring program. The aging management review (AMR) results line item in LRA Table 3.5.2-7 (LRA page 3.5-160) associated with generic note J and plant-specific note 3, indicates that this component includes the material “fiberglass,” lists the aging effect

requiring management as “change in material properties” in an air-indoor uncontrolled environment, and credits the Structures Monitoring program for aging management. LRA Table 3.5.2-7, note 3, associated with this line item, notes that the “fiberglass blanket covers [of the permanent drywell shielding] will be inspected by the Structures Monitoring program for rips and tears.” Further, generic Note J states that “neither the component nor the material and environment combination is evaluated in NUREG-1801.”

The staff notes that the GALL Report AMP XI.S6 does not include fiberglass blanket covers of shielding components as part of the scope of the program and does not include “rips and tears” in the Parameters Monitored or Inspected program element, nor does it include associated acceptance criteria in the Acceptance Criteria program element.

Issue:

It is not clear to the staff how the LRA Structures Monitoring program will be adequate to manage aging effects without providing enhancement(s) to the applicable program elements to include relevant parameters to be monitored or inspected, detection of aging effects, and the associated acceptance criteria, as applicable, for the plant-specific component “fiberglass blanket covers for permanent drywell shielding” for which the AMP is credited. Further, there is an inconsistency in the aging effect being managed between the associated LRA Table 3.5.2-7 AMR results line item and the corresponding plant-specific note 3 (“change in material properties” versus “rips and tears”).

Request:

1. Explain how the enhancement to the Scope of Program program element that adds a plant-specific component type “permanent drywell shielding” is adequate to manage aging effects without providing corresponding enhancement(s) to the applicable program elements to include relevant parameters to be monitored or inspected, detection of aging effects, and the associated acceptance criteria, as applicable, for the plant-specific component. Otherwise, provide the necessary enhancement to the program elements of the Structures Monitoring program to adequately manage the applicable aging effects for the plant-specific component/material/environment/aging effect combination described above.
2. Describe the aging effect(s) and aging mechanism that will be managed by the AMP for the permanent drywell shielding fiberglass blanket covers and clarify the inconsistency between the aging effect described in LRA Table 3.5.2-7 AMR results line item (LRA page 3.5-160) and the corresponding plant-specific note 3 (“change in material properties” versus “rips and tears”).

RAI B.2.1.35-1

Background:

Section 54.21(a)(3) of 10 CFR requires applicants to demonstrate that the effects of aging for structures and components will be adequately managed so that the intended function(s) will be maintained consistent with the CLB for the PEO. As described in the SRP-LR, an applicant may

demonstrate compliance with 10 CFR 54.21(a)(3) by referencing the GALL Report when evaluation of the matter in the GALL Report applies to the plant.

LRA Section B.2.1.35 states that the RG 1.127, Inspection of Water-Control Structures Associated with Nuclear Power Plants program will be consistent with the aging management program specified in the GALL Report AMP XI.S7, "RG 1.127, Inspection of Water-Control Structures Associated with Nuclear Power Plants." The Scope of Program program element of GALL Report AMP XI.S7 states that the water-control structures included in the NRC Regulatory Guide (RG) 1.127 program are concrete structures, structural steel and structural bolting, among other structures, associated with emergency cooling water systems or flood protection of nuclear power plants.

During the license renewal AMP audit, the staff noted that the Scope of Program program element in the LRA AMP basis document (LA-PBD-AMP XI.S7, Revision 3) included enhancement 1 (LR Commitment No. 35, item 1) which states that the existing program and procedures will be enhanced to include, among others, the "shad net anchors" to the scope of the existing RG 1.127 program. During the audit, the staff noted that the concrete structure (concrete piers), to which the anchors for the shad net are attached, is within the scope of license renewal; however, this concrete structure did not appear to be included as part of the LRA enhancement to the Scope of Program program element. During the license renewal AMP audit, the applicant clarified that the "shad net anchors" component referenced in the LRA includes both the steel elements of the anchors and the concrete pier structures.

Issue:

It is unclear to the staff whether the different materials/components associated with the "shad net anchors" are within the scope of the RG 1.127 program. The staff is concerned that the RG 1.127 program might not adequately manage the aging effects of in-scope components associated with water-control structures if the different materials/components from the "shad net anchors" structure are not clearly described in the LRA AMP Scope of Program program element. The staff notes that different materials/components (i.e. the steel anchors elements and the concrete piers) have different aging effects that require different parameters to be monitored or inspected for aging management to ensure that their intended function(s) is maintained for the PEO.

Request:

Clarify how the enhancement for the Scope of Program program element is consistent with that described in the GALL Report AMP XI.S7 for including the water-control structures associated with the RG 1.127 program (e.g. concrete pier and anchors from the shad net anchors) to ensure that the aging effects of in-scope components are being adequately managed. Include a description of all the different materials/components associated with the "shad net anchors" that are within the scope of the RG 1.127 program. Also, describe any differences in the parameters to be monitored or inspected between the different materials (e.g., steel, concrete) or components associated with the "shad net anchors." Also, provide applicable conforming updates to the LRA and/or Updated Final Safety Analysis Report (UFSAR) supplement, as appropriate, based on the clarification.

RAI B.3.1.2-1

Background:

An evaluation of time limited aging analyses (TLAA), pursuant to 10 CFR 54.21(c)(1)(iii), requires an applicant to demonstrate that the effects of aging on the intended function(s) will be adequately managed for the PEO. As described in Section 4.5.3.1.3 of the SRP-LR, an applicant may demonstrate adequate management of aging effects on concrete containment tendon prestress, under 10 CFR 54.21(c)(1)(iii), by referencing the GALL Report AMP X.S1, "Concrete Containment Tendon Prestress," when evaluation of the matter in the GALL Report AMP applies to the plant.

The Acceptance Criteria program element of the GALL Report AMP X.S1 states, in part, "[t]he goal is to keep the trend line above the PLL [predicted lower limit] because, as a result of any inspection performed in accordance with ASME Section XI, Subsection IWL, if the trend line crosses the PLL, the existing prestress in the containment tendon could go below the MRV [minimum required value] soon after the inspection and would not meet the requirements…." This statement in the Acceptance Criteria program element of the GALL Report AMP is intended to address acceptance criteria for the case where the updated trend line crosses the PLL line.

The "Concrete Containment Tendon Prestress" AMP described in LRA Sections B.3.1.2 and A.3.1.2 includes an enhancement (Enhancement 1, LR Commitment No. 44) applicable to the Monitoring and Trending program element that will be implemented prior to the PEO to establish consistency with the GALL Report AMP X.S1. This enhancement states:

> For each surveillance interval, trending lines will be updated ["projected" in LRA Section A.3.1.2] through the period of extended operation as part of the regression analysis and compared to the predicted lower limit and minimum required values for each tendon group. Program element Affected: Monitoring and Trending (Element 5).

During the audit, the staff noted that the program element description in Section 3.6, "Acceptance Criteria," of the applicant's program basis document (LA-PBD-AMP-X.S1, Revision 1) states, in part:

> The trend line regression analysis for each tendon group is updated after each surveillance inspection to reflect newly acquired data from each tendon within its respective group, consistent with NRC Information Notice 99-10. If the trend line for any tendon group falls below the respective PLL line, then the cause should be determined, evaluated, and corrected.

The staff also noted that the second statement cited above was also included in Section 3.7, "Corrective Actions," of the program basis document. These statements appear to indicate that Enhancement 1 (LR Commitment No. 44) is applied and implemented in the Acceptance Criteria program element of the LRA AMP to address the case where the trend line goes below the PLL, when the comparison of the two lines is made as committed to by the enhancement.

However, Section 3.6 of the program basis document indicated that the LRA AMP program element was consistent with that of the GALL Report AMP without any enhancement.

Issue:

The Acceptance Criteria program element of GALL Report AMP includes a provision intended to address the case where the trend line goes below the PLL when the comparison of the two lines is made. It is not clear if the program enhancement (LR Commitment No. 44), that commits to comparison of the trend line and the PLL, will also be applicable to and implemented in the Acceptance Criteria program element of the LRA AMP because:

- the LRA AMP and the program basis document state that Enhancement 1 to the LRA AMP is applicable only to the Monitoring and Trending program element, and
- statements exist in the description of the Acceptance Criteria program element of the LRA program basis document that appear to address the case when the trend line goes below the PLL; however the program element description also states that there is no enhancement to the program element.

The staff needs additional information to determine if the Acceptance Criteria program element of the LRA AMP is consistent with the GALL Report AMP.

Request:

Clarify, with the basis, whether the enhancement (Enhancement 1, LR Commitment No. 44) in LRA Section B.3.1.2, intended to establish consistency with the GALL Report AMP X.S1 and described in the LRA AMP as applicable only to the Monitoring and Trending program element, will also be applicable to and implemented in the Acceptance Criteria program element in order to become consistent with the Acceptance Criteria program element of the GALL Report AMP. Also, provide applicable conforming updates to the LRA and/or UFSAR supplement, as appropriate, based on the response.