



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

August 28, 2015

LICENSEE: Exelon Generation Co., LLC

FACILITY: LaSalle County Station, Units 1 and 2

SUBJECT: SUMMARY OF TELECON HELD ON JUNE 3, 2015, BETWEEN THE NRC AND EXELON GENERATION CO., LLC, CONCERNING REQUEST FOR ADDITIONAL INFORMATION SET 4 PERTAINING TO THE LASALLE COUNTY STATION LICENSE RENEWAL APPLICATION (TAC NOS. MF5347 AND MF5346)

The U.S. Nuclear Regulatory Commission (NRC or the staff) and representatives of Exelon Generation Co., LLC (Exelon or the applicant) held a telephone conference call on June 3, 2015, to discuss and clarify the staff's draft requests for additional information (DRAIs) provided in Enclosure 2 concerning the LaSalle County Station, Units 1 and 2, license renewal application. The telephone conference call was useful in clarifying the intent of the staff's DRAIs.

Enclosure 1 provides a listing of the participants and Enclosure 2 contains the DRAIs discussed with the applicant, including a brief description on the status of the items.

The applicant had an opportunity to comment on this summary.

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

Enclosures:

1. List of Participants
2. Summary of Telephone Conference Call

cc: Listserv

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DATE	8/ 19 /15	8/ 25 /15	8/ 26 /15	8/ 28 /15	8/ 28 /15

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Memo to Exelon Generation Co. from J. Mitchell dated August 28, 2015

SUBJECT: SUMMARY OF TELECON HELD ON JUNE 3, 2015, BETWEEN THE NRC AND EXELON GENERATION CO., LLC, CONCERNING REQUEST FOR ADDITIONAL INFORMATION SET 4 PERTAINING TO THE LASALLE COUNTY STATION LICENSE RENEWAL APPLICATION (TAC NOS. MF5347 AND MF5346)

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TELEPHONE CONFERENCE CALL
LASALLE COUNTY STATION, UNITS 1 AND 2
LICENSE RENEWAL APPLICATION

LIST OF PARTICIPANTS
JUNE 3, 2015

PARTICIPANTS

AFFILIATION

Jeffrey Mitchell	U.S. Nuclear Regulatory Commission (NRC)
George Thomas	NRC
Bryce Lehman	NRC
John Hufnagel	Exelon Generation Co., LLC (Exelon)
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Wayne Choromanski	Exelon
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SUMMARY OF TELEPHONE CONFERENCE CALL
LASALLE COUNTY STATION, UNITS 1 AND 2
LICENSE RENEWAL APPLICATION
JUNE 3, 2015

The U.S. Nuclear Regulatory Commission (NRC or the staff) and representatives of Exelon Generation Co., LLC (Exelon or the applicant) held a telephone conference call on June 3, 2015, to discuss and clarify the following draft requests for additional information (DRAIs) concerning the LaSalle County Station, Units 1 and 2 license renewal application (LRA).

DRAI B.2.1.29-1

Background:

Section 54.21(a)(3) of Title 10 of the *Code of Federal Regulations* 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, appropriate Appendix J tests (GALL Report AMP XI.S4) may be performed in lieu of surface examination.

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 appropriate 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

ENCLOSURE 2

Commission (NRC) staff to evaluate the appropriateness of the test to detect cracking in these components.

Request:

1. State whether the supplemental surface examinations recommended in GALL Report AMP XI.S1 will or will not 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 the GALL Report AMP XI.S1 will be used, describe the exception to the GALL Report AMP XI.S1, and justify the exception.

Teleconference Summary:

The staff clarified a question regarding the specific line item in the GALL Report associated with this RAI, and agreed to add information to the RAI to include the line item information, as well as background information from NUREG 1950, "Disposition of Public Comments and Technical Bases for Changes in the License Renewal Guidance Documents NUREG 1801 and NUREG 1800." The applicant had no other questions regarding this RAI.

DRAI B.2.1.33-1

Background:

The regulation in 10 CFR 54.21(a)(3) 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 SRP LR, an applicant may demonstrate compliance with 10 CFR 54.21(a)(3) by referencing the GALL Report and 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 states 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: "The 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 parameter intended to be monitored, as evaluated 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 that described in the GALL Report AMP XI.S6 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.

Teleconference Summary:

The staff clarified that Request 1 should reference the GALL Report AMP XI.S5 instead of XI.S6, and will correct this reference in the final RAI. The applicant had no other questions regarding this RAI.