



**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 10, 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 10, 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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Memo to Exelon Generation Co. from J. Mitchell dated August 28, 2015

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

LIST OF PARTICIPANTS  
JUNE 10, 2015

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AFFILIATION

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U.S. Nuclear Regulatory Commission (NRC)

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SUMMARY OF TELEPHONE CONFERENCE CALL  
LASALLE COUNTY STATION, UNITS 1 AND 2  
LICENSE RENEWAL APPLICATION  
JUNE 10, 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 10, 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.2.1.34-1**

Background:

Section 54.21(a)(3) of 10 CFR 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 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 and 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 elements of aging management program specified in 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 no. 7; LR Commitment No 34, item 7) only addresses item (b) of the GALL Report recommendations stated above.

ENCLOSURE 2

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 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.

Teleconference Summary:

The staff clarified that Request 1 should read "non-aggressive ground water/soil environment," instead of "aggressive ground water/soil environment," and agreed to correct this error in the final RAI. The applicant had no other questions regarding this RAI.

**DRAI B.2.1.34-2**

Background:

Section 54.21(a)(3) of 10 CFR 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 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 and 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/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 (i.e., “change in material properties” versus “rips and tears”).

Request:

1. Explain how the enhancement for the “scope of program” program element to add 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 (i.e., “change in material properties” versus “rips and tears”).

Teleconference Summary:

The applicant had no questions regarding this RAI.

**DRAI B.2.1.35-1**

Background:

Section 54.21(a)(3) of 10 CFR 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 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 and 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 (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 "shad net anchors" are attached to, is within the scope of license renewal; however, these structures were not 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 within scope components associated with water-control structures if the different material 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) has different aging effects that requires 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 within scope components are being adequately manage. In the clarification 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, in the clarification, describe any differences in the parameters to be monitored or inspected between the different materials (e.g., steel, concrete) 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.

Teleconference Summary:

The staff clarified the wording regarding the reference to the "shad net anchors" in the Background section of this RAI. The staff will revise the wording in this section in the final RAI to more clearly identify the component in question. The applicant had no other questions regarding this RAI.