

## NRR-DMPSPeM Resource

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**From:** Vaidya, Bhalchandra  
**Sent:** Tuesday, January 22, 2019 8:54 AM  
**To:** david.gullott@exeloncorp.com; Sprengel, Ryan:(GenCo-Nuc)  
**Subject:** LaSalle 1 and 2, EPID-L-2018-LLR-0162, LAR RE: Removal of Operating Mode Restrictions for Performing Surveillance Testing of the Div 3 Battery and HPCS DG, DRAFT Request for Additional Information (RAI)

**Subject:** LaSalle County Station, Units 1 and 2 - License Amendment Request to Remove Operating Mode Restrictions for Performing Surveillance Testing of the Division 3 Battery and High Pressure Core Spray Diesel Generator.

EPID- L-2018-LLA-0162 (CAC NOS. 000976/05000373/ L-2018-LLA-0162, and 000976/05000374/ L-2018-LLA-0162)

Docket Nos. 50-373 and 50-374

David and Ryan,

By application dated April 19, 2018 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML18157A123), Exelon Generation Company, LLC (EGC), the licensee requested an amendment to Renewed Facility Operating License Nos. NPF-11 and NPF-18 for LaSalle County Station (LSCS), Units 1 and 2, respectively. The license amendment request (LAR) is related to the changes to Technical Specifications to Remove Operating Mode Restrictions for Performing Surveillance Testing of the Division 3 Battery and High Pressure Core Spray Diesel Generator.

The NRC staff has determined that additional information is necessary to complete its review regarding the requested amendment.

The NRC Staff's DRAFT request for additional information (RAIs) are provided below:

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**DRAFT REQUEST FOR ADDITIONAL INFORMATION**  
**LICENSE AMENDMENT REQUEST TO REVISE THE TECHNICAL SPECIFICATIONS TO**  
**3.8.4 AND 3.8.6 TO REMOVE MODE RESTRICTIONS FROM TECHNICAL SPECIFICATIONS SURVEILLANCE REQUIREMENTS**  
**DOCKET NOS. 50-373 AND 50-374**  
**(EPID NO. L-2018-LLA-0162)**

By application dated April 19, 2018 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML18157A123), Exelon Generation Corporation, LLC (the licensee), requested an amendment to the Renewed Facility Operating License Nos. NPF-11 and NPF-18 for LaSalle County Station Units 1 and 2 respectively. The proposed amendment would revise Technical Specifications (TS) 3.8.1, "AC Sources-Operating," and TS 3.8.4, "DC Sources-Operating." Specifically, the proposed changes would remove operating Mode restrictions for performance of TS Surveillance Requirements pertaining to the Division 3 battery and high pressure core spray diesel generator. To complete its review, the U.S. Nuclear Regulatory Commission (NRC) staff requests a response to the questions below.

### **Request Additional Information (RAI) 1**

Title 10 of the *Code of Federal Regulations* (10 CFR) Part 50, Appendix A of Part 50, General Design Criterion (GDC) 17, "Electric Power Systems," states, in part, that an onsite electric power system and an offsite electric power system be provided to permit functioning of structures, systems, and components important to safety. The safety function for each system (assuming the other system is not functioning) shall be to provide sufficient capacity and capability to assure that (1) specified acceptable fuel design limits and design conditions of the reactor coolant pressure boundary are not exceeded as a result of anticipated operational occurrences and (2) the core is cooled and containment integrity and other vital functions are maintained in the event of postulated accidents. The onsite electric power supplies shall have sufficient independence, redundancy, and testability to perform their safety functions assuming a single failure.

Subsection 3.1, "Division 3 Battery Surveillance Testing," of the license amendment request (LAR) discusses the time needed to perform the battery testing required by SR 3.8.4.3 and SR 3.8.6.6 relatively to the time the high pressure core spray (HPCS) system is allowed to be out of service by the current TS. The discussion in Subsection 3.1 also implies that the above tests are proposed to be performed when the HPCS is already out of service during the HPCS system planned maintenance outage.

The LAR, however, does not include a similar discussion for the HPCS diesel generator testing required by other SRs. It is not clear whether the HPCS diesel generator tests are proposed to be performed only when the HPCS is already out of service during the HPCS

system planned maintenance outage. Please provide a discussion of when the HPCS diesel generator tests will be performed. If the HPCS diesel generator tests are not be performed during the HPCS system planned maintenance outage, please provide a description of how these tests impact the Division 3 SSCs, as listed in UFSAR Table 8.1-1.

It is also not clear if the HPCS diesel generator testing can be performed within the time that the HPCS system is allowed to be out of service by the current TS. Please provide a discussion of the time needed to perform the HPCS diesel generator tests required each of the following SRs.

- SR 3.8.1.10
- SR 3.8.1.11
- SR 3.8.1.12
- SR 3.8.1.13
- SR 3.8.1.16
- SR 3.8.1.17
- SR 3.8.1.19

## RAI 2

Subsection 3.2.4, "Online Testing Versus Outage Testing," of the LAR states that the Division 3 diesel generator supplies only the HPCS pump and associated support equipment and auxiliaries (as listed in LSCS UFSAR Table 8.1-3). However, UFSAR Table 8.1-3 provides a list of the nuclear safety electrical design criteria. The NRC staff notes that UFSAR Table 8.1-1, "Power Assignment of Safety-Related Systems to Electrical Divisions for Separation," indicates that Division 3 power is assigned to the following SSCs:

- HPCS
- Diesel generator 1B (2B)
- 125-Vdc system 3
- 4160-volt bus 143 (243)
- 480-volt MCC 143-1 (243-1)
- Auxiliary support systems, power and control for the preceding

It is not clear what SSCs the HPCS diesel generator provides power to. To ensure the HPCS diesel generator testing does not impact other equipment besides the HPCS pump and the associated support equipment.

- a. Please provide the relationship between the HPCS diesel generator and the above SSCs.
- b. Please confirm that the HPCS diesel generator is dedicated to the HPCS system and not providing other functions.

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Please contact me to schedule a telephone conference to ensure that the licensee clearly understands the staff concerns and also to ascertain when the licensee will respond to these RAIs.

If you have any questions, please contact me at (301) 415-3308.

Bhalchandra K. Vaidya  
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**From:** Vaidya, Bhalchandra

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