March 21, 2001

Mr. Oliver D. Kingsley, President
Exelon Nuclear
Exelon Generation Company, LLC
1400 Opus Place, Suite 500
Downers Grove, IL 60515

SUBJECT: LASALLE COUNTY STATION - NRC INSPECTION REPORT 50-373/01-05(DRS); 50-374/01-05(DRS)

Dear Mr. Kingsley:

On March 9, 2001, the NRC completed an inspection at your LaSalle County Station, Units 1 and 2. The results of this inspection were discussed on March 9, 2001, with Mr. M. Schiavoni and other members of your staff. The enclosed report presents the results of that inspection.

The inspection was an examination of activities conducted under your license as they relate to radiation safety and to compliance with the Commission's rules and regulations and with the conditions of your license. Within these areas, the inspection consisted of a selective examination of procedures and representative records, facility walkdowns, and interviews with personnel. Specifically, the inspection focused on aspects of Public Radiation Safety.

No findings of significance were identified.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be available electronically for public inspection in the NRC Public Document Room or from the Publically Available Records (PARS) component of NRC's document system (ADAMS). ADAMS is accessible from the NRC Web site at http://www.nrc.gov/NRC/ADAMS/imdex.html (the Public Electronic Reading Room).

We will gladly discuss any questions you have concerning this inspection.

Sincerely,

***/RA/***

Gary L. Shear, Chief
Plant Support Branch
Division of Reactor Safety

Docket Nos. 50-373; 50-374
License Nos. NPF-11; NPF-18

Enclosure: Inspection Report 50-373/01-05(DRS); 50-374/01-05(DRS)

See Attached Distribution

cc w/encl: W. Bohlke, Senior Vice President, Nuclear Services
C. Crane, Senior Vice President - Mid-West Regional
J. Cotton, Senior Vice President - Operations Support
J. Benjamin, Vice President - Licensing and Regulatory Affairs
H. Stanley, Operations Vice President
J. Skolds, Chief Operating Officer
R. Krich, Director - Licensing
R. Helfrich, Senior Counsel, Nuclear
DCD - Licensing
C. Pardee, Site Vice President
M. Schiavoni, Station Manager
W. Riffer, Regulatory Assurance Supervisor
M. Aguilar, Assistant Attorney General
Illinois Department of Nuclear Safety
State Liaison Officer
Chairman, Illinois Commerce Commission

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U.S. NUCLEAR REGULATORY COMMISSION

REGION III

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|---|---|
| Docket Nos: | 50-373; 50-374 |
| License Nos: | NPF-11; NPF-18 |
| Report No: | 50-373/01-05(DRS); 50-374/01-05(DRS) |
| Licensee: | Exelon Generation Company, LLC |
| Facility: | LaSalle County Station, Units 1 and 2 |
| Location: | 2605 N. 21st Road<br>Marseilles, IL. 51341-9756 |
| Dates: | March 5-9, 2001 |
| Inspector: | David Nelson, Radiation Specialist |
| Observer: | Ryan Alexander, Radiation Specialist |
| Approved by: | Gary L. Shear, Chief<br>Plant Support Branch<br>Division of Reactor Safety |

# NRC's REVISED REACTOR OVERSIGHT PROCESS

The federal Nuclear Regulatory Commission (NRC) recently revamped its inspection, assessment, and enforcement programs for commercial nuclear power plants. The new process takes into account improvements in the performance of the nuclear industry over the past 25 years and improved approaches of inspecting and assessing safety performance at NRC licensed plants.

The new process monitors licensee performance in three broad areas (called strategic performance areas): reactor safety (avoiding accidents and reducing the consequences of accidents if they occur), radiation safety (protecting plant employees and the public during routine operations), and safeguards (protecting the plant against sabotage or other security threats). The process focuses on licensee performance within each of seven cornerstones of safety in the three areas:

| Reactor Safety | Radiation Safety | Safeguards |
|---|---|---|
| ● Initiating Events | ● Occupational | ● Physical Protection |
| ● Mitigating Systems | ● Public | |
| ● Barrier Integrity | | |
| ● Emergency Preparedness | | |

To monitor these seven cornerstones of safety, the NRC uses two processes that generate information about the safety significance of plant operations: inspections and performance indicators. Inspection findings will be evaluated according to their potential significance for safety, using the Significance Determination Process, and assigned colors of GREEN, WHITE, YELLOW or RED. GREEN findings are indicative of issues that, while they may not be desirable, represent very low safety significance. WHITE findings indicate issues that are of low to moderate safety significance. YELLOW findings are issues that are of substantial safety significance. RED findings represent issues that are of high safety significance with a significant reduction in safety margin.

Performance indicator data will be compared to established criteria for measuring licensee performance in terms of potential safety. Based on prescribed thresholds, the indicators will be classified by color representing varying levels of performance and incremental degradation in safety: GREEN, WHITE, YELLOW, and RED. GREEN indicators represent performance at a level requiring no additional NRC oversight beyond the baseline inspections. WHITE corresponds to performance that may result in increased NRC oversight. YELLOW represents performance that minimally reduces safety margin and requires even more NRC oversight. And RED indicates performance that represents a significant reduction in safety margin but still provides adequate protection to public health and safety.

The assessment process integrates performance indicators and inspection so the agency can reach objective conclusions regarding overall plant performance. The agency will use an Action Matrix to determine in a systematic, predictable manner which regulatory actions should be taken based on a licensee's performance. The NRC's actions in response to the significance (as represented by the color) of issues will be the same for performance indicators as for inspection findings. As a licensee's safety performance degrades, the NRC will take more and increasingly significant action, which can include shutting down a plant, as described in the Action Matrix.

More information can be found at: http://www.nrc.gov/NRR/OVERSIGHT/index.html.

## SUMMARY OF FINDINGS

IR 05000373-01-05(DRS), IR 05000374-01-05(DRS), on 03/05-03/09/01, Exelon Generation Company, LLC, LaSalle County Station, Units 1 and 2. Radiation Specialist report.

The inspection was conducted by a regional radiation specialist.

Cornerstones: Occupational and Public Radiation Safety

A. Inspector Identified Findings

No findings of significance were identified.

B. Licensee Identified Findings

No findings of significance were identified.

Report Details

Summary of Plant Status: Both units operated at or near 100 percent power during the inspection period.

## 2. RADIATION SAFETY

Cornerstone: Occupational Radiation Safety

2OS1 Access Control to Radiologically Significant Areas

.1 Plant Walkdowns and Radiological Boundary Verifications

a. Inspection Scope

The inspector conducted walkdowns of the radiologically controlled area to verify the adequacy of radiological boundaries and postings. Specifically, the inspector walked down several radiologically significant work area boundaries (high and locked high radiation areas) in the Reactor Building, the Radioactive Waste Building, and the Turbine Building.

b. Findings

No findings of significance were identified.

Cornerstone: Public Radiation Safety

2PS2 Radioactive Material Processing and Transportation

.1 Walkdown of Radioactive Waste Systems

a. Inspection Scope

The inspector reviewed the liquid and solid radioactive waste system description in the Updated Final Safety Analysis Report (UFSAR) and the most recent radiological effluent release report (1999) for information on the types and amounts of radioactive waste (radwaste) disposal. The inspector performed walkdowns of the liquid and solid radwaste processing systems located in the Turbine Building and the Radwaste Building to verify that the systems agreed with the descriptions in the UFSAR and the Process Control Program (PCP), and to assess the material condition and operability of the systems. The inspector reviewed the current processes for transferring waste resin and waste sludge into shipping containers to determine if appropriate waste stream mixing and/or sampling procedures were utilized. The inspector also reviewed the methodologies for waste concentration averaging to determine if representative samples of the waste product were provided for the purposes of waste classification in 10 CFR 61.55. During this inspection, the licensee was not conducting waste processing.

b. Findings

No findings of significance were identified.

.2 Waste Characterization and Classification

a, Inspection Scope

The inspector reviewed the licensee's radiochemical sample analysis results for each of the licensee's waste streams including dry active waste (DAW), resins, waste sludges, and filters. The inspector also reviewed the licensee's use of scaling factors to quantify difficult-to-measure radionuclides (e.g., pure alpha or beta emitting radionuclides). The reviews were conducted to verify that the licensee's program assures compliance with 10 CFR 61.55 and 10 CFR 61.56 as required by Appendix G of 10 CFR Part 20. The inspector also reviewed the licensees' waste characterization and classification program to ensure that the waste stream composition data accounts for changing operational parameters and thus remains valid between the annual sample analysis updates.

b. Findings

No findings of significance were identified.

.3 Shipment Preparation

a. Inspection Scope

Since there were no radioactive materials shipments during the inspection, the inspector reviewed the records of training provided to personnel responsible for the conduct of radioactive waste processing and radioactive shipment preparation activities. The review was conducted to verify that the licensee's training program provided training consistent with NRC and Department of Transportation (DOT) requirements.

b. Findings

No findings of significance were identified.

.4 Shipping Records

a. Inspection Scope

The inspector reviewed five non-excepted package shipments completed in year 2000 to verify compliance with NRC and DOT requirements (i.e., 10 CFR Parts 20 and 71 and 49 CFR Parts 172 and 173).

b. Findings

No findings of significance were identified.

.5 Identification and Resolution of Problems

a. Inspection Scope

The inspector reviewed Nuclear Oversight assessments and Radiation Protection Department self-assessments of the Radioactive Waste Management and Radioactive Material Shipping Programs to evaluate the effectiveness of the self-assessment process to identify, characterize, and prioritize problems. The inspector also verified that previous radioactive waste and radioactive materials shipping related issues were adequately addressed. The inspector also reviewed selected years 2000 and 2001 Condition Reports (CR) that addressed access control, and radioactive waste and radioactive materials shipping program deficiencies. The review was conducted to verify that the licensee had effectively implemented the corrective action program.

b. Findings

No findings of significance were identified.

## 4. OTHER ACTIVITIES

4OA6 Management Meetings

Exit Meeting Summary

The inspector presented the inspection results to Mr. M. Schiavoni and other members of licensee management and staff at the conclusion of the inspection on March 9, 2001. No proprietary information was identified by the licensee.

## PARTIAL LIST OF PERSONS CONTACTED

Licensee

K. Bartes, Nuclear Oversight Manager
A. Duncan, Regulatory Assurance
M. Hayworth, Nuclear Oversight
K. Hobbs, Radiation Protection Technical Lead
C. Jeanblanc, Chemistry - Radwaste Specialist
C. Magistro, Radiation Protection - Shipper
C. Pardee, Site Vice President
P. Quealy, Acting Radiation Protection Manager
M. Schiavoni, Station Manager

NRC

E. Duncan, Senior Resident Inspector
G. Wilson, Resident Inspector
R. Alexander, Observer

## ITEMS OPENED, CLOSED AND DISCUSSED

Opened

None

Closed

None

Discussed

None

## LIST OF ACRONYMS USED

| | |
|---|---|
| CR | Condition Reports |
| DAW | Dry Active Waste |
| DOT | Department of Transportation |
| PCP | Process Control Program |
| UFSAR | Updated Final Safety Analysis Report |

LIST OF DOCUMENTS REVIEWED

Corporate & Station Procedures

LRP-5600-13, Revision 1, “Trending for Shifts in Sampling Factors and Waste Stream Sampling”
RW-AA-100, Revision 0, “Process Control Program for Radioactive Wastes”

Radiation Protection Self-Assessments

Focus-Area Self-Assessment Report, “Radioactive Material/Waste Shipping” (2/20-23/2001)

Shipping Records

LW00-04, Waste Sludge (Type B; 02/28/2000)
LW00-13, Bead Resin (LSA-II; 02/02/2000)
LW00-37, Activated Hardware (Type B; 06/20/2000)
LW00-62, Phase Separator Waste (Type B; 12/05/2000)
LW00-75, Phase Separator Waste (Type B; 12/15/2000)

Nuclear Oversight Documents

Nuclear Oversight Assessment NOA-01-99-031, “Radwaste Shipping, Effluent Monitoring” (05/28/1999)
Nuclear Oversight Assessment NOA-01-00-PS01, “Radwaste Management and Work Practices” (4/14/2000)
Nuclear Oversight Field Observation Form 01-99-12-043, “Radwaste Shipment” (12/14/1999)
Nuclear Oversight Field Observation Form 01-00-03-115, “Qualifications - NLO’s & On-site RW Processing Contractor” (03/27/2000)
Nuclear Oversight Field Observation Form 01-00-04-020, “Radwaste - Process Control Program” (04/06/2000)

Condition Reports and Related

CR database for CYs 2000-2001 related to shipping/radioactive waste and access control
Individual CRs reviewed included Nos. L2000-07021, L2001-01353, L2001-01092, and L2000-06584

Training Documents

Radioactive Material Shipping Job Assignment Matrix [Radiation Protection and Radwaste Staff] (07/07/2000 & 03/08/2001)
CNS/ComEd Technical Service Representatives Training Status [Radwaste Laborers] (03/08/2001)
Training Administrative System Person Course History Lists for Radwaste/shipping personnel

Other Documents

Updated Final Safety Analysis Report, Revision 13, Chapter 11.2
1999 Annual Radioactive Effluent Report (04/28/2000)
Radioactive Material Shipment Logs (Attachment 16 of RP-AA-600, Revision 0)
Radioactive Waste Shipment Logs (Attachment 17 of RP-AA-600, Revision 0)
Waste Stream Report & Scaling Factors from RadMan Software (03/08/00)
Letter to U.S. NRC, "Registration of Exelon Generation Company, LLC as an Authorized User of NRC Licensed Transport Packages" (01/16/2001)