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December 29, 2000
Docket Nos. 50-352
50-353
License Nos. NPF-39
NPF-85

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

SUBJECT: Limerick Generating Station, Units 1 and 2
Annual 10CFR50.59 and Commitment Revision Report
For The Period July 1, 1999 through June 30, 2000

Dear Sir/Madam,

Attached is the Annual 10CFR50.59 and Commitment Revision Report as required by 10CFR50.59(b). If you have any questions or require additional information, please contact us.

Sincerely,

Robert C. Braun
Plant Manager,
Limerick Generating Station

PTD/ ptd

cc: H. J. Miller, Administrator Region I, USNRC
A. L. Burritt, USNRC Senior Resident Inspector, LGS

IE47

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EXELON NUCLEAR
LIMERICK GENERATING STATION
UNITS 1 AND 2
DOCKET NOS. 50-352 AND 50-353

ANNUAL 10CFR50.59 AND COMMITMENT REVISION REPORT
JULY 1, 1999 THROUGH JUNE 30, 2000

LIMERICK GENERATING STATION

EXELON NUCLEAR
LIMERICK GENERATING STATION
UNITS 1 AND 2
DOCKET NOS. 50-352 AND 50-353

ANNUAL 10CFR50.59 AND COMMITMENT REVISION REPORT JULY 1, 1999 THROUGH JUNE 30, 2000

This report provides a brief description of changes to the facility and procedures as described in the Safety Analysis Report, tests, and experiments that were implemented between July 1, 1999 and June 30, 2000. A summary of the safety evaluation for each item concluded that an unreviewed safety question, as defined in 10CFR50.59(a)(2), was not involved.

EXELON NUCLEAR
LIMERICK GENERATING STATION
UNITS 1 AND 2
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ANNUAL 10CFR50.59 AND COMMITMENT REVISION REPORT

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EXELON NUCLEAR
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SAFETY EVALUATION SUMMARIES

MOD ECR 95-03579 and ECR 95-03581 Unit 1 [x] Unit 2 [x] Common [ ]

This modification removed recorders AR-069-1(2)37 and AR-069-1(2)43 from the Main Control Room (MCR) panel 1(2)0-C673 and installed one Westronics 2100 series recorder where AR-069-1(2)37 was removed. This change required revision to UFSAR Figures 11.3-2 Sheets 2 and 4. This evaluation concluded that no unreviewed safety questions were involved and that the margin of safety was not reduced.

MOD ECR 98-00954 Unit 1 [ ] Unit 2 [x] Common [ ]

This modification relocated the Unit 2 Reactor Water Cleanup (RWCU) Regenerative Heat Exchanger Channel Side Relief Valve, PSV-044-209, downstream of the Regenerative Heat Exchanger and the Unit 2 RWCU Regenerative Heat Exchanger Shell Side Relief Valve, PSV-044-208, upstream of the heat exchanger shell side inlet. The affected portion of the RWCU system is non-safety related, but is maintained in accordance with the original design requirements (ASME III, Class 3). This change required a revision to UFSAR Figure 5.4-16, Sheet 4. This evaluation concluded that no unreviewed safety questions were involved and that the margin of safety was not reduced.

MOD ECR 99-00407 Unit 1 [x] Unit 2 [x] Common [x]

This modification upgraded /replaced Radiation Monitoring Data System (RMDS) hardware /software equipment to support Year 2000 compliance. This mod required a change to UFSAR section 11.5.6. This evaluation concluded that no unreviewed safety questions were involved and that the margin of safety was not reduced.

MOD ECR 99-00530 Unit 1 [x] Unit 2 [x] Common [x]

This modification removed one of two 100 % capacity Residual Heat Removal (RHR)/Core Spray room unit coolers from service while the associated subsystem remained operable. This change required revision to UFSAR sections 7.3, 9.2, and 9.4. This evaluation concluded that no unreviewed safety questions were involved and that the margin of safety was not reduced.

MOD ECR 99-01359 Unit 1 [x] Unit 2 [ ] Common [ ]

This modification installed a level switch on the HPCI turbine exhaust drain pot to help verify that the turbine exhaust flow orifice, FO-056-*D017 is unclogged. A change to UFSAR Figure 6.3-8 was required. This evaluation concluded that no unreviewed safety questions were involved and that the margin of safety was not reduced.

MOD ECR 99-01468 Unit 1 [x] Unit 2 [ ] Common [ ]

This modification provides improvement to the Reactor Core Injection Coolant (RCIC) main steam supply outboard Primary Containment Isolation Valve (PCIV), HV-049-1F008. A change to UFSAR Figure 7.4-1 was required. This evaluation concluded that no unreviewed safety questions were involved and that the margin of safety was not reduced.

MOD ECR 99-01623 and 99-00699 Unit 1 [x] Unit 2 [x] Common [ ]

This modification physically removed the condenser shell conductivity sensors and plug connections, and retired associated instrumentation. A change to Sections 1.2, 1.4, 7.2, 7.7, 8.2, 8.3, 10.1-4, Chapter 15, and several related Figures and Tables of the UFSAR was required. This evaluation concluded that no unreviewed safety questions were involved and that the margin of safety was not reduced.

MOD ECR 99-01865 Unit 1 [x] Unit 2 [ ] Common [ ]

This modification addressed changes associated with re-routing cables for the Residual Heat Removal Shutdown Cooling inboard isolation valve HV-051-1F009, and removal of administrative controls associated with outboard isolation valve HV-051-1F008. A revision to UFSAR Sections 5.4, UFSAR Tables 6.2-17 and 9A-12, FSAR section 9A and FSAR Table 9A-12 was required. This evaluation concluded that no unreviewed safety questions were involved and that the margin of safety was not reduced.

MOD ECR 99-02161 and 00-00037 Unit 1 [x] Unit 2 [x] Common [ ]

This modification removed the external pressure lock piping and drilled the valve wedge for Core Spray valve HV-052-1(2)F037. This change required a revision to UFSAR Figure 6.3-9, UFSAR Table 5.2-3 and Table 7.6-7. This evaluation concluded that no unreviewed safety questions were involved and that the margin of safety was not reduced.

MOD ECRs 98-01872 and 98-01884 Unit 1 [x] Unit 2 [x] Common [ ]

This modification installed a logic change to the control circuitry for motor operated valve HV-055-1(2)F003 to allow the full capability of the motor to be applied in scenarios when the subject valve must close against high differential pressure (i.e., a line break downstream of the subject valve). This modification revises UFSAR Fig 7.3-7. This evaluation concluded that no unreviewed safety questions were involved and that the margin of safety was not reduced.

MOD P00411 ECR 96-03548 Unit 1 [x] Unit 2 [x] Common [ ]

This modification installed instrumentation for the condensate filter demineralizer elements. This evaluation concluded that no unreviewed safety questions were involved and that the margin of safety was not reduced.

MOD P00580, Rev. 1 Unit 1 [x] Unit 2 [x] Common [ ]

This revision addressed the Unit 2 specific location of the first stage pressure taps and increased the Main Transformer rating identified in the UFSAR. Also, additional discussion and references to the impact on reload analysis concerning both Units 1 and 2 was included. A change to Section 5.4 and Tables 6.2-17 and 9A-12 of the UFSAR was required. This evaluation concluded that no unreviewed safety questions were involved and that the margin of safety was not reduced.

MOD P00703-2 Unit 1 ☐ Unit 2 ☒ Common ☐

This modification addressed one of several physical plant changes required to satisfy the Fire Safe Shutdown (FSSD) re-analysis under project 8655, Thermo-Lag Reduction. This change provided check valves and accumulators inline with the Primary Containment Instrument Gas (PCIG) piping to meet the short term gas supply requirements. It ensures the Main Steam Relief Valves (MSRVs) controlled at the Remote Shutdown Panel (RSP) can be utilized at low pressure. A change to sections 5.2 and Figures 5.1-3, 9.5-10 and 9.3-2 of the UFSAR was required. This evaluation concluded that no unreviewed safety questions were involved and that the margin of safety was not reduced.

MOD P00741, Rev.2 ECR 99-00733 Unit 1 ☒ Unit 2 ☒ Common ☐

This modification revision reduced the mod scope to replace only the 1A and 2A RWCU 50% capacity pumps with 100% capacity pumps and added supplementary discussion on certain aspects of the modification. A change to sections 5.4, 3.5, Figures 1.2 series, 3.6-39,4.6-5, 4.6-7, 5.4-16, 5.4-17, 7.2-14, 7.7-11, 8.3-2, 9.2-25, 9.3-1, 12.3-17, and Tables 3.2-1, 3.6-6, 3.6-7, 3.9-6(P), 3A-28, 5.4-2, and 8.8-3 of the UFSAR was required by this modification. This evaluation concluded that no unreviewed safety questions were involved and that the margin of safety was not reduced.

MOD P00741-1, Rev.1 ECR 98-02300 Unit 1 ☒ Unit 2 ☒ Common ☐

This modification improved the Reactor Water Cleanup (RWCU) system by replacing the 1A and 2A RWCU 50% capacity pumps with 100% capacity pumps, pump motors and other supporting systems upgrades. Changes to: sections 5.4 and 3.5, Figures 1.2 series, Figures 3.6-39, 4.6-5, 4.6-7, 5.4-16, 5.4-17, 7.2-14, 7.7-11, 8.3-2, 9.2-25, 9.3-1, and 12.3-17, and Tables 3.2-1, 3.6-6, 3.6-7, 3.9-6(P), 3A-28, 5.4-2, and 8.8-3 of the UFSAR were required. This evaluation concluded that no unreviewed safety questions were involved and that the margin of safety was not reduced.

MOD P00781, Rev.3 ECR 98-00125 and 98-00133 Unit 1 ☒ Unit 2 ☒ Common ☐

This modification relocated the Spent Fuel Pool EL. 352 Area Radiation Monitor (ARM) sensors, from the lip of the Spent Fuel Pool to a position on the wall north of the spent fuel pool. A change to UFSAR Table 12.3-7 and Figure 12.3-19 was required. This evaluation concluded that no unreviewed safety questions were involved and that the margin of safety was not reduced.

MOD P00825-1, ECR 99-02000 Unit 1 [x] Unit 2 [ ] Common [ ]

This portion of the modification addressed installation of a monitoring system to the Reactor Water Cleanup system (RWCU) to obtain quantitative data on the effectiveness of Noble Metals (Platinum and Rhodium) chemical addition into the Unit 1 reactor pressure vessel. A change to sections 5.4.8, 7.7.1 and Figures 1.2-51, 1.2-59, 5.4-16,and 5.4-17 of the UFSAR was required. This evaluation concluded that no unreviewed safety questions were involved and that the margin of safety was not reduced.

MOD P00825-1, Rev.1/ Rev. 2 ECR 99-02009 Unit 1 [x] Unit 2 [ ] Common [ ]

This portion of the modification addressed Noble Metals (Platinum and Rhodium) chemical addition into the Unit 1 reactor pressure vessel to protect reactor internal components from stress corrosion cracking. Revision 1 modified the Shutdown Cooling system isolation temperature and clarified the changes to reactor water chemistry during the injection phase. Revision 2 clarified the design parameter for deposition on the reactor metal surfaces. A change to section 5.2.3 and Table 5.2-4 of the UFSAR was required. This evaluation concluded that no unreviewed safety questions were involved and that the margin of safety was not reduced.

MOD P00874, Rev.1 ECR 99-01416 and 99-001417 Unit 1 [x] Unit 2 [x] Common [ ]

This modification combined the replacement of automatically operated Emergency Service Water (ESW) primary supply isolation valves to the Emergency Diesel Generators (EDGs), with manually operated butterfly valves. This Modification also installed handswitches, alarm circuitry, and piping to support this change. Revision 1 evaluated a change to both Unit 1 and Unit 2. A change to Figure 9.9-2 of the UFSAR and the Fire Protection Evaluation Report (Appendix 9A), was required. This evaluation concluded that no unreviewed safety questions were involved and that the margin of safety was not reduced.

NCR ECR 00-00647 Unit 1 [x] Unit 2 [ ] Common [ ]

This "use-as-is" NCR disposition addresses the potential existence of loose parts in the feedwater and reactor coolant systems. The potential was discovered during refuel outage 1R08 when some items were discovered on the shroud ledge near jet pump #11. This Lost Parts Analysis considered the safety consequences of continued power operations should these parts migrate within the reactor pressure boundary and supporting systems. This evaluation concluded that no unreviewed safety questions were involved and that the margin of safety was not reduced.

NCR ECR 98-00608 Unit 1 [x] Unit 2 [x] Common [ ]

This "use-as-is" disposition of this NCR evaluated the diesel generator jacket water standby circulating pump motor (1A-P530), being refurbished with materials that were not qualified and then placed in service on diesel generator D11. The evaluation covered the downgrade of all the jacket water standby circulating pump motors (1/2 A/B/C/D-P532), along with other components associated with the diesel generators. A change to Section 9.5 of the UFSAR was required. This evaluation concluded that no unreviewed safety questions were involved and that the margin of safety was not reduced.

NCR ECR 98-01200 and 98-01201 Unit 1 [x] Unit 2 [x] Common [ ]

This "repair" disposition NCR addressed replacement of Instantaneous Magnetic (IM) Only Molded-Case-Circuit-Breakers (MCCBs) with Thermal Magnetic (TM) MCCBs for the 480 volt power supplies to the containment Reactor Water Cleanup Isolation MOV HV-044-1(2)F001. This change was required to meet a licensing commitment, as reflected in the UFSAR and Regulatory Guide 1.63 requirements. A change to Table 8.3-32 and Figure 8.1-2 of the UFSAR was required. This evaluation concluded that no unreviewed safety questions were involved and that the margin of safety was not reduced.

NCR ECR 98-02880 Unit 1 [x] Unit 2 [ ] Common [ ]

This "use-as-is" disposition for NCR 98-02880 addressed the acceptability of the height of fuel movements in the Unit 1 spent fuel pool. This NCR was a result of document reviews, which found that the height of fuel movements over the Unit 1 high density spent fuel racks, could exceed limits described in the UFSAR. A change to Section 9.1 of the UFSAR was required. This evaluation concluded that no unreviewed safety questions were involved and that the margin of safety was not reduced.

NCR ECR 99-01131 Unit 1 [ ] Unit 2 [x] Common [ ]

This "use-as-is" disposition NCR addressed the continued operation of Unit 2 with components of HV-051-2F050B missing when disassembled. These items had the potential of being within the reactor coolant system. This change included a Lost Parts Analysis, which evaluated the various locations these items could migrate to and addressed the potential safety consequences of these items remaining in the reactor vessel during power operations. This evaluation concluded that no unreviewed safety questions were involved and that the margin of safety was not reduced.

NCR ECR 99-01134 Unit 1 [x] Unit 2 [ ] Common [ ]

This interim "repair" NCR change to addressed a discrepancy in two different places in the UFSAR description of the normal position of the Unit 1 main steam pressure equalizing valve HV-C- 041-1F020. UFSAR section 10.3.2 and UFSAR Figure 5.1-3, sheet 2 both describe the valve as normally open. An interim document change was required to show the correct position of the valve as closed. A change to UFSAR sections 6.7 and 10.3 and Figure 5.1-3 was required. This evaluation concluded that no unreviewed safety questions were involved and that the margin of safety was not reduced.

NCR ECR 99-01933 Unit 1 [x] Unit 2 [x] Common [ ]

This "repair" disposition NCR addressed a change to the Emergency Service Water (ESW) system flow and differential flow instrumentation loop. The change is required due to the spurious annunciation on high differential flow caused by the ESW flow instrumentation without any actual leakage into or out of the ESW system. A change to UFSAR section 7.5 was required. This evaluation concluded that no unreviewed safety questions were involved and that the margin of safety was not reduced.

NCR ECR 99-02845, Rev. 2 Unit 1 [ ] Unit 2 [x] Common [ ]

This "rework" disposition of the NCR evaluated a drop in the Emergency Diesel Generator D-24 frequency to 56.89 Hz for 0.4 seconds. The drop occurred upon application of the 2D Residual Heat Removal motor load during performance of Special procedure SP-173. Special Procedure SP-207, Rev. 1 was developed to ensure diesel generator D24 performance remains within the bounds of an evaluated condition of 56.29 Hz for 0.5 seconds. This rework NCR addressed the bounding conditions of SP-207, Rev. 1 for diesel generator D24 operation. A change to section 8.1.6 of the UFSAR was required. This evaluation concluded that no unreviewed safety questions were involved and that the margin of safety was not reduced.

TPA ECR 00-00834 Unit 1 [x] Unit 2 [ ] Common [ ]

This temporary change allowed a change to the position of hand valve HV-041-1F016, "Main Steam Line Drain Inboard PCIV", from normally closed to normally open and backseated. This evaluation concluded that no unreviewed safety questions were involved and that the margin of safety was not reduced.

TPA ECR 96-00924, Rev. 1 Unit 1 [x] Unit 2 [x] Common [ ]

This change involved the early removal of the reactor well upper shield plugs before the reactor is in cold shutdown. This evaluation concluded that no unreviewed safety questions were involved and that the margin of safety was not reduced.

PROCEDURE M-097-046, Rev. 5 Unit 1 [x] Unit 2 [x] Common [ ]

This change to procedure M-097-046, "Control of Fuel Inspection Activities," added controls for use of the GE Channel Dimensional Measurement Device (CHAD). This will provide more accurate measurement of fuel channels for bows, bulges and twists along its length. This evaluation concluded that no unreviewed safety questions were involved and that the margin of safety was not reduced.

PROCEDURE SP-204, Rev.0 Unit 1 [x] Unit 2 [ ] Common [ ]

This change added Special Procedure SP-204, "On-Line Cleaning of 10-T522, Condensate Storage Tank", provides instructions necessary to clean the bottom of the Unit 1 Condensate Storage Tank, 10-T522 by vacuuming solids from the bottom and discharging the effluent to the Radwaste Equipment Drain System for processing. UFSAR sections 6.3 and 7.3 were required to be changed. This evaluation concluded that no unreviewed safety questions were involved and that the margin of safety was not reduced.

UFSAR CHANGE ECR 00-00275 Unit 1 [x] Unit 2 [x] Common [ ]

This UFSAR change supports the operation of the Residual Heat Removal (RHR) system in Alternate Decay Heat Removal (ADHR) Method. This change provides flood-up to support ADHR operation for Refuel Outage 1R08. Sections 5.4 and 9.1 of the UFSAR were revised. This evaluation concluded that no unreviewed safety questions were involved and that the margin of safety was not reduced.

UFSAR CHANGE ECR 97-01899 Unit 1 [x] Unit 2 [x] Common [ ]

This UFSAR change revised the sizing calculation for the Limerick 1E charger and the Limerick 1E battery. The UFSAR Loading Tables 8.3-18 through 8.3-24 and UFSAR Section 8.3 were revised. The change addressed how the factory battery test required by the purchasing clauses meets the requirements of the revised UFSAR and battery loading. The change also clarified the wording in the UFSAR regarding the ability of the battery to charge. This evaluation concluded that no unreviewed safety questions were involved and that the margin of safety was not reduced.

UFSAR CHANGE ECR 98-00273 Unit 1 [x] Unit 2 [x] Common [ ]

This UFSAR change reflects organizational changes in the Limerick Generating Station, Site Services Division, Facilities, Document Services, and Business Services Sections, as well as, the Off-Site Support Organization reporting relationship. A change to UFSAR section 13 was required. This evaluation concluded that no unreviewed safety questions were involved and that the margin of safety was not reduced.

UFSAR CHANGE ECR 98-00295 Unit 1 [x] Unit 2 [x] Common [ ]

This UFSAR change reflects organizational changes in the Limerick Generating Station Nuclear Planning and Development Department, Support Services Division, Protection Services Section and the Site Support Services Division. A change to UFSAR chapter 13 was required. This evaluation concluded that no unreviewed safety questions were involved and that the margin of safety was not reduced.

UFSAR CHANGE ECR 98-01632 Unit 1 [x] Unit 2 [x] Common [ ]

This UFSAR change described changes to the Site Engineering Division and Site Support Services Division organizations for Limerick Generating Station (LGS) Units 1 and 2. A change to Section 13.1 and Figure 13.1-2 of the UFSAR was required. This evaluation concluded that no unreviewed safety questions were involved and that the margin of safety was not reduced.

UFSAR CHANGE ECR 98-02255 Unit 1 [x] Unit 2 [x] Common [ ]

This UFSAR change described organizational changes of Limerick Generating Station (LGS) Units 1 and 2 to reflect the change of responsibility of Predictive Maintenance to report to the Maintenance Planning Manager. A change to UFSAR section 13 was required. This evaluation concluded that no unreviewed safety questions were involved and that the margin of safety was not reduced.

UFSAR CHANGE ECR 98-02561 Unit 1 [x] Unit 2 [x] Common [ ]

This UFSAR change accommodated the testing of the backup diesel driven fire pump by crediting manual starting of the primary fire pumps in the case of a fire while in the testing configuration. A change to UFSAR sections 9.5.1.2.2, Fire Protection Water Supply Systems, and UFSAR section 9A.2, Fire Protection System Description, was required. The evaluation concluded that no unreviewed safety questions were involved and that the margin of safety was not reduced.

UFSAR CHANGE ECR 98-02786 Unit 1 [x] Unit 2 [x] Common [ ]

This UFSAR change described organizational changes to the Emergency Preparedness and Nuclear Security sections of Limerick Generating Station (LGS) Units 1 and 2. A change to UFSAR section 13 was required. This evaluation concluded that no unreviewed safety questions were involved and that the margin of safety was not reduced.

UFSAR CHANGE ECR 98-02907 Unit 1 [x] Unit 2 [x] Common [ ]

This UFSAR change reflects organizational changes in the Limerick Generating Station Site Services Division, Industrial Risk Management (IRM) Section. A change to UFSAR section 13 was required. This evaluation concluded that no unreviewed safety questions were involved and that the margin of safety was not reduced.

UFSAR CHANGE ECR 98-03178 Unit 1 ☐ Unit 2 ☐ Common ☒

This change updates UFSAR sections 13.1.2, 13.1.3, 13.5.1.26, 17.2.2.5, and UFSAR Figures 13.1-2 and 13.1-3 to reflect organizational changes resulting from the merger of the Chemistry and Radwaste sections under the responsibility of one Manager who reports to the Plant Manager. This evaluation concluded that no unreviewed safety questions were involved and that the margin of safety was not reduced.

UFSAR CHANGE ECR 99-01602 Unit 1 ☒ Unit 2 ☒ Common ☐

This UFSAR change described organizational changes to Limerick Generating Station (LGS) Units 1 and 2 Site Engineering. A change to UFSAR section 13 was required. This evaluation concluded that no unreviewed safety questions were involved and that the margin of safety was not reduced.

UFSAR CHANGE ECR 99-02132 Unit 1 ☒ Unit 2 ☒ Common ☐

This UFSAR change described organizational changes to onsite organizations at Limerick Generating Station (LGS) and the Offsite Nuclear Support Organization. The evaluation reconciles and makes consistent other organizational changes previously approved. A change to UFSAR section 13 was required. This evaluation concluded that no unreviewed safety questions were involved and that the margin of safety was not reduced.

UFSAR CHANGE ECR 99-02356 Unit 1 ☒ Unit 2 ☒ Common ☐

This UFSAR change revises the operability status of the redundant Standby Gas Treatment System (SGTS) filter train during purging and venting of the Primary Containment to make it consistent with current practices. A change to UFSAR section 9.4.5 was required. This evaluation concluded that no unreviewed safety questions were involved and that the margin of safety was not reduced.

UFSAR CHANGE ECR 99-02573 Unit 1 ☒ Unit 2 ☒ Common ☐

This UFSAR change addressed steady state operation with one Main Steam Line (MSL) isolated and associated operational actions under procedural control. This evaluation limited power operations under this condition to not more than 75% of rated power. A change to section 5.4 of the UFSAR was required. This evaluation concluded that no unreviewed safety questions were involved and that the margin of safety was not reduced.

UFSAR CHANGE ECR 99-02821 Unit 1 ☒ Unit 2 ☒ Common ☐

This change to UFSAR Sections 13.1 and 17.2 addresses changes in the Offsite Nuclear Support Organization and other changes to management reporting relations. This evaluation concluded that no unreviewed safety questions were involved and that the margin of safety was not reduced.

OTHER — Continued use of Control Rod Blade 38-39 — Unit 1 [x] Unit 2 [ ] Common [ ]

This change evaluated the acceptability of the continued use of Control Blade 38-39, which will exceed its nominal nuclear lifetime % Boron-10 depletion before the end of LGS 1 cycle 8. This evaluation concluded that no unreviewed safety questions were involved and that the margin of safety was not reduced.

COMMITMENT REVISION T00708 [SNM Tags] — Unit 1 [ ] Unit 2 [ ] Common [x]

This change allows use of signs as well as tags to identify Special Nuclear Material (SNM) and clarifies that labeling of SNM is not required when stored or transported underwater (for example, fuel in the fuel pools). The original commitment was in response to a Notice of Violation, NRC Inspection Report No. 50-353/89-32, which addressed tagging of all SNM in storage or transit by requiring the use of distinctive tags. This change meets the original intent of the commitment and has no impact on SSCs.

COMMITMENT REVISION T04153 [wood scaffolding] — Unit 1 [x] Unit 2 [x] Common [x]

This change revised the LGS IPEEE to allow use of wood scaffolding, but require that use be minimized in the RCA. The original commitment was that all wood scaffolding would be replaced with metal scaffolding. The original intent of the IPEEE fire risk commitment will still be met. There are no impacts on SSCs as a result of this commitment change.