

November 5, 2001

MEMORANDUM TO: James W. Clifford, Chief, Section 2
Project Directorate I
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

FROM: Christopher Gratton, Project Manager, Section 2 **/RA/**
Project Directorate I
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

SUBJECT: LIMERICK GENERATING STATION (LGS), UNITS 1 AND 2, FACSIMILE
TRANSMITTING A REQUEST FOR ADDITIONAL INFORMATION RE:
RELIEF REQUEST RR-04 (TAC NOs. MB1018 and MB1019)

The attached list of draft questions were transmitted by facsimile on September 26, 2001, to Mr. Dave Helker of Exelon Generation Company (the licensee). The draft questions were transmitted to facilitate a conference call which occurred on October 17, 2001, between the licensee and members of the Nuclear Regulatory Commission (NRC) technical staff. As a result of discussions with the licensee, the NRC staff agreed to the following modifications. First, the licensee stated that the information requested in draft Question 2 is contained in a March 3, 1992, letter from Philadelphia Electric Company to the NRC. As a result, the licensee will not respond to draft Question 2. Likewise, the licensee informed the NRC that the information requested in draft Question 4 regarding IWF-2000 can be found in Technical Specification 3/4.7.4. The licensee does not plan to respond to the portion of draft Question 4 pertaining to IWF-2000. The licensee will respond to all other draft questions.

This memorandum and the attachment do not convey or represent an NRC staff position regarding the licensee's request. The licensee anticipates that the requested information can be provided by November 15, 2001.

Docket Nos. 50-352, 50-353

Attachment: Draft Questions

November 5, 2001

MEMORANDUM TO: James W. Clifford, Chief, Section 2
Project Directorate I
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

FROM: Christopher Gratton, Project Manager, Section 2 **/RAI/**
Project Directorate I
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION (RAI), LIMERICK
GENERATING STATION (LGS), UNITS 1 AND 2, CONCERNING
LICENSE AMENDMENT REQUEST No. 99-10-0 AND THE
SUBSEQUENT CONFERENCE CALL TO DISCUSS THE RAI
(TAC NOs. MB2271 and MB2272)

The attached list of draft questions were transmitted by facsimile on September 26, 2001, to Mr. Dave Helker of Exelon Generation Company (the licensee). The draft questions were transmitted to facilitate a conference call which occurred on October 17, 2001, between the Mr. Tom Loomis of the licensee's staff and members of the Nuclear Regulatory Commission (NRC) technical staff. As a result of discussions with the licensee, the NRC staff agreed to the following modifications. First, the licensee stated that the information requested in draft Question 2 is contained in a March 3, 1992, letter from Philadelphia Electric Company to the NRC. As a result, the licensee will not respond to draft Question 2. Likewise, the licensee informed the NRC that the information requested in draft Question 4 regarding IWF-2000 can be found in Technical Specification 3/4.7.4. The licensee does not plan to respond to the portion of draft Question 4 pertaining to IWF-2000. The licensee will respond to all other draft questions.

This memorandum and the attachment do not convey or represent an NRC staff position regarding the licensee's request. The licensee anticipates that the requested information can be provided by November 15, 2001.

Docket Nos. 50-352, 50-353

Attachment: Limerick Units 1 and 2 Snubber Relief Request

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Limerick Units 1 & 2 Snubber Relief Request (RR-04)
Request for Additional Information

In its letter dated June 27, 2001, Exelon Generation Corporation (the licensee) requested relief from the requirement of American Society of Mechanical Engineers (ASME) Code, Section XI, for the examination and testing of Class 1, 2 and 3 snubber assemblies. The following additional information is requested from the licensee:

1. In the letter dated June 27, 2001, the licensee identified the components covered in RR-04 to be ASME Class 1, 2, and 3 snubber assemblies, Code Examination Category F-A, Item Numbers F1.10 through F1.40. The staff noted that these item numbers are referenced in Table IWF-2500-1 of ASME Code, Section XI, 1989 Edition, 1990 Addenda through the later editions and addenda. The staff also noted that a different set of item numbers is referenced in Table IWF- 2500-1 of ASME Code, Section XI, 1989 Edition (with no Addenda). Verify the applicable addenda of Section XI of the ASME Code for the Limerick second 10-year Inservice Inspection (ISI) interval.
2. The licensee stated that the Technical Specifications functional testing program is based on the 1990 Addenda to ASME/ANSI OM-1987, Part 4, "Examination and Performance Testing of Nuclear Power Plant Dynamic Restraints (Snubbers)". Since the ASME Code, Section XI, specifically references the first Addenda to ASME/ANSI OM-1987, Part 4 (published in 1988) for snubber inservice inspection, discuss the differences in snubber requirements between the two OM Code addenda, and justify the applicability of the 1990 Addenda for the Limerick snubber ISI program.
3. The licensee stated that examinations are to be performed by qualified personnel. Discuss in detail the plant procedure of qualifying personnel to perform the examination and how the procedure and the personnel qualification meet the VT-3 examination requirements of ASME Code, Section XI.
4. Discuss in detail how the proposed examination requirements of Technical Specifications (TS) 3/4.7.4 will meet the inspection requirements of ASME Code Section XI, Subsections IWF- 2000 and IWF-5000, for the snubber assembly, which includes the snubber body and attachments out to and including the load pins and their retainers.