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June 24, 2002

United States Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555-0001

Limerick Generating Station, Units 1 and 2
Facility Operating License Nos. NPF-39 and NPF-85
NRC Docket Nos. 50-352 and 50-353

Subject: Request For Additional Information Regarding the Impact of the
Construction of the Linfield Energy Center Power Plant on the Safe
Operation of the Limerick Generating Station

Dear Mr. Gratton:

By letter dated May 24, 2002, the NRC requested an assessment of the impact of the construction and operation of the Linfield Energy Center power plant on the safe operation of the Limerick Generating Station. In addition to the assessment, Exelon was requested to address specific issues of an attached letter from the Limerick Township Board of Supervisors. The Limerick Township issues are addressed in an attachment to this letter.

Exelon agrees with the NRC that in accordance with Title 10 of the Code of Federal Regulations, Section 100.10, a detailed review of the impact of the construction and operation of the Linfield Energy Center power plant must be completed and that the Limerick Updated Final Safety Analysis Report (UFSAR) may require revision.

The Linfield Energy Center power plant is in the development/design stage and construction is scheduled to occur in the summer of 2003 to support commercial operation of the plant in June 2005. Information required to perform a detailed assessment is not available at this time. Construction drawings showing materials, components and dimensions specific to the Linfield site have not been issued.

A preliminary assessment has been performed using currently available information on the Linfield Energy Center power plant. In addition to the requirements of 10CFR100.10, the criteria discussed in Regulatory Guide 1.70.8, "Nearby Industrial, Transportation, and Military Facilities" and NUREG 800, "Standard Review Plan for the Review of Safety Analysis Reports for Nuclear Power Plants" have been considered. Utilizing the limited information about the Linfield Plant that is available, Exelon has not identified a hazard associated with the construction and operation of the Linfield facility that would adversely impact the safe operation of Limerick Generating Station.

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Exelon will continue to monitor the progress of the Linfield Energy Center power plant construction. Construction activities prior to pre-operational testing, performed in the vicinity of the gas pipeline, will be bounded by the pipeline breach analysis currently documented in the Limerick UFSAR. Exelon will perform a detailed assessment in accordance with 10CFR100.10 after construction drawings are available, and prior to pre-operational testing.

If you need any additional information, please contact Mr. Douglas Walker, Exelon Licensing, at (610) 765-5726.

Sincerely,



Michael P. Gallagher
Director, Licensing and Regulatory Affairs
Mid-Atlantic Regional Operating Group

Attachment

cc: H. J. Miller, Administrator, Region I, USNRC
A. L. Burritt, USNRC Senior Resident Inspector, LGS
R. R. Janati, Commonwealth of Pennsylvania

ATTACHMENT

The NRC requested that Exelon respond to issues identified by the Limerick Township Board of Supervisors in their letter to Senator Arlen Specter dated April 30, 2002. Those concerns, along with Exelon's responses are listed below.

a. "The FP&L proposal clearly violating the existing Exelon exclusion zone of 2,500 feet from their nuclear reactor."

The Exclusion Area for Limerick, as shown in Figure 2.1-3 of the Limerick Updated Final Safety Analysis Report (UFSAR), is defined as the area encompassed by a radius of 2500 feet from the center of each reactor unit. The property within the exclusion area is either owned or controlled by Exelon Generation Co. The property proposed for the FP&L Linfield Energy Center power plant, described in material obtained from the "Application for Permit to Construct Linfield Energy Center", is at the intersection of Longview and Sanatoga roads and is beyond the Limerick Exclusion Area.

b. "The proposed FP&L facility would be within 75 feet of the communities' primary water source (Perkiomen Pipeline) already additionally utilized to cool the Exelon nuclear reactor. Any mishap at the FP&L facility could thus easily sever the pipeline with devastating impact."

The Perkiomen pipeline only supplies water to the Limerick Generating Station and is not a source of water for the community. The Perkiomen pipeline system has no safety-related function. Failure of the system does not compromise any safety-related system or component, or prevent a safe shutdown of the plant (reference Limerick UFSAR section 10.4.5.2). While the Perkiomen pipeline may be available to make up for evaporative losses from the cooling towers, no reliance is placed on this water source for the purpose of any safety analysis or for the licensing basis of the facility. Therefore, a severed Perkiomen pipeline will have no impact on the safe operation and shutdown of the plant. The safety-related systems required to safely shutdown the plant do not require water from the Perkiomen pipeline to perform their design functions.

c. "The FP&L facility, as proposed would be directly adjacent to two major natural gas pipelines. Accordingly its positioning and proximity to the two natural gas lines, the Perkiomen pipeline and the Exelon Nuclear Facility collectively contribute to making the site a potentially devastating terrorist target of a Chernobyl-like level of magnitude in Southeast Pennsylvania."

The existence of the Columbia Gas Transmission Company natural gas pipelines that run adjacent to the site has been previously evaluated with respect to various hazards, including explosions, missile generation, and flammable gas clouds, to be within the design requirements of Appendix A, "General Design Criteria for Nuclear Power Plants," to 10 CFR Part 50, "Domestic Licensing of Production and Utilization Facilities".

The introduction of the Linfield Energy Center Plant, to be located within a 5 mile radius of the Limerick Generating Station, introduces a new potential hazard that must be evaluated in accordance with 10 CFR Part 100.10. A detailed assessment will be performed prior to pre-operational testing of the Linfield facility.

Current information about the Linfield Energy Center indicates that natural gas will not be stored onsite. The preliminary hazard assessment, performed by Exelon, considered a confined gas explosion occurring in the largest structure currently proposed for the facility. A natural gas explosion in the largest structure will be significantly less powerful on a TNT equivalence basis and will be at a greater distance than the UFSAR evaluated explosion of a natural gas cloud resulting from the rupture of the Columbia Gas pipeline.

Since no details concerning the design of the Linfield Energy Center structures or equipment are available, a missile hazard evaluation could not be performed at this time. However, based on the relative location of the facility and the magnitude of a postulated explosion, missile generation is not expected to exceed the bounds of the current tornado and rail car analysis in Limerick's UFSAR. Additionally, the location of Limerick with respect to the postulated Linfield Energy Center explosion is well beyond the safe standoff distance, as evaluated based on NUREG/CR-2462, "Capacity of Nuclear Power Plant Structures to Resist Blast Loadings".

The results of the preliminary assessment performed, using existing information and conservative assumptions, indicate that a natural gas explosion at the proposed Linfield Energy Center will have no effect on the structures important to the safe operation of the Limerick Generating Station.
