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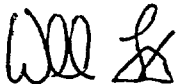
Limerick Generating Station, Units 1 and 2
Facility Operating License Nos. NPF-39 and NPF-85
NRC Docket Nos. 50-352 and 50-353

Subject: Annual Commitment Change Summary Report

This report summarizes Limerick changes to NRC commitments that meet the threshold for reporting for the period from July 1, 2001 to June 30, 2002. Changes to these commitments are performed using procedure LS-AA-110 Commitment Management which employs the guidance provided in NEI 99-04 Guidelines for Managing NRC Commitment Changes. NEI 99-04 was approved by the NRC for licensee use by SECY-00-045 Acceptance of NEI 99-04, 'Guidelines for Managing NRC Commitments'. Licensees were informed that NEI 99-04 was an acceptable process for control of regulatory commitments by the issuance of RIS 2000-17 Managing Regulatory Commitments made by Power Reactor Licensees to the NRC Staff on September 21, 2000.

If you have any questions or require additional information, please do not hesitate to contact us.

Sincerely,



William Levis
Vice President - Limerick

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

AC001

Limerick
Annual Commitment Change Summary Report
2002

LS-AA-110 Commitment Management, Section 4.6, "NRC Notification", requires submittal of a written report once per calendar year. This report shall contain a summary of commitment changes that require NRC notification.

The following commitment changes were implemented between July 1, 2001 and June 30, 2002 and require NRC notification.

Commitment change tracking number.	2001-001
CT number:	T00714
Commitment source document:	NRC Inspection Report 50-352/90-13 and 50-353/90-12 (NOV)
Change:	Deleted

Statement of violation:

Construction Building controlled procedures were not being maintained per A-2 in that there were obsolete procedure revisions, missing procedures, misfiled procedures and a missing volume of procedures

Statement of commitment:

A random sampling methodology is being developed using Military Standard 105, "Sampling Procedures and Tables for Inspection by Attributes." This periodic random sampling methodology will be performed on all the CDLs and will identify specific deficiencies, potential problem areas, and adverse trends in a timely manner. Follow up actions will be developed for errors identified during the periodic random sampling based on the number and the severity of the errors. A procedure will be written to ensure this periodic random sampling methodology is performed on an established frequency. An "Administrative Guideline" (AG) will be written to describe how to perform the periodic random sampling methodology.

Justification for change:

This commitment is an implemented long-term corrective action in a response to an NRC NOV and may be changed with follow-up NRC notification in the next annual Commitment Change Summary Report. Exelon is required to perform activities to meet ANSI N18.7 Administrative Controls and Quality Assurance for the Operation Phase of Nuclear Power Plants and N45.2.11 Quality Assurance Requirements for the Design of Nuclear Power Plants, which are specified in UFSAR section 17.2.II PECO Energy NG's Application of Industry Standards and USNRC Regulatory Guides. The existing UFSAR requirement for performing audits meets these requirements and ensures no adverse impact from deleting this commitment.

Limerick
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Commitment change tracking number: 2001-002
CT number: T03476
Commitment source document: NRC Inspection Report 50-352/87-05 (NOV)
Change: Deleted

Statement of violation:

Numerous Category 1 drawings at the TSC did not contain as-built changes.

Statement of commitment:

A revision to Administrative Procedure A-6 Control and Distribution of Drawings, Manuals and Drawing Logs was PORC approved on April 29, 1987. This revision specifies time requirements for updating the print files. The Modification Group implemented the use of a Master Log that will track the distribution of revised drawings within the time frame specified in the revised A-6 procedure.

Justification for change:

This commitment is an implemented long-term corrective action in a response to an NRC NOV and may be changed with followup NRC notification in the next annual Commitment Change Summary Report. Exelon is required to perform activities to meet ANSI N18.7 Administrative Controls and Quality Assurance for the Operation Phase of Nuclear Power Plants and N45.2.11 Quality Assurance Requirements for the Design of Nuclear Power Plants. These are specified in UFSAR section 17.2.II PECO Energy NG's Application of Industry Standards and USNRC Regulatory Guides. The existing UFSAR requirement ensures no adverse impact from deleting this commitment.

Commitment change tracking number: 2001-003
CT number: T03480
Commitment source document: NRC Inspection Report 50-352/87-19 (NOV)
Change: Deleted

Statement of violation:

Electrical drawing E-15 was not maintained in an as-built condition in the control room and maintenance request coordinator office. Also the as-built Drawing Update Form (A-14, Appendix 7) did not reflect drawing E-15 as a Category I drawing requiring red lining due to plant modification 84-0026. Therefore, the applicable copies of the E-15 drawings were not updated at the Category I drawing locations as defined in Administrative Procedure A-6.

Statement of commitment:

Bi-weekly audits to ensure that only the current revision of drawings are located at Category I drawing areas have been initiated. Administrative Procedure A-14 Appendix 7 will be revised to implement these items.

Justification for change:

This commitment is an implemented long-term corrective action in a response to an NRC NOV and may be changed with followup NRC notification in the next annual Commitment Change Summary Report. Exelon is required to perform activities to meet ANSI N18.7 Administrative Controls and Quality Assurance for the Operation Phase of Nuclear Power Plants and N45.2.11 Quality Assurance Requirements for the Design of Nuclear Power Plants. These are specified in UFSAR section 17.2.II PECO Energy NG's Application of Industry Standards and USNRC Regulatory Guides. The existing UFSAR requirement for performing audits meets these requirements and ensures no adverse impact from deleting this commitment.

Limerick
Annual Commitment Change Summary Report
2002

Commitment change tracking number: 2002-001
CT number: T03266
Commitment source document: NRC Inspection Report 50-352/91-05 and 50-353/91-06 (NOV)
Change: Deleted

Statement of violation:

Several examples of violations of Plant Technical Specification Administrative Controls were identified regarding the Station Qualified Reviewer (SQR), Responsible Superintendent (RS), and Plant Operations Review Committee (PORC) responsibilities designated in the procedure review and approval process. One of the causes for this violation was a failure to perform a self-assessment or to have Nuclear Quality Assurance (NQA) audit the effectiveness of the new program in a timely manner.

Statement of commitment:

The self assessment process guideline will be revised to include guidance to perform a self assessment within the same self assessment cycle that a major process or program is revised or first implemented.

Justification for change:

This commitment is an implemented long-term corrective action in a response to an NRC NOV and may be changed with followup NRC notification in the next annual Commitment Change Summary Report. The commitment was an additional action and did not directly address the initial violation concerning inadequacies in the original implementation of the SQR process. This commitment is not necessary to minimize the potential for future non-compliance.