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10 CFR 50.55a

February 14, 2003

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

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: Implementation of the Performance Demonstration Methods Supplement  
Ten (10) – “Qualification Requirements for Dissimilar Metal Piping Welds”

Reference: Letter from M. P. Gallagher (Exelon Generation Company, LLC) to  
U. S. Nuclear Regulatory Commission, dated December 13, 2002

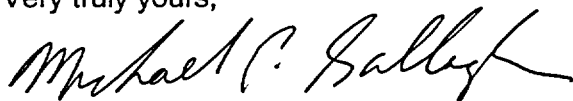
Dear Sir/Madam:

In the referenced letter, Exelon Generation Company (Exelon), LLC requested approval of a proposed alternative concerning performance demonstration methods for ultrasonic examination systems for Limerick Generating Station (LGS), Units 1 and 2. Specifically, this proposed alternative concerns dissimilar metal piping welds as implemented by Supplement 10.

Section 3.2, “Sizing Acceptance Criteria,” of Attachment 2 to the referenced letter, provided a recommended error of less than or equal to 0.125” for crack depth sizing capability. Exelon has been informed that personnel qualifying to the Supplement 10 procedures were not capable of being qualified to an overall error less than or equal to a 0.125” RMS for crack depth sizing capability. Based on the performance of the General Electric automated procedure qualification results, an error of up to 0.155” RMS should be considered during fracture mechanics calculations utilizing automated depth-sizing measurements obtained with this procedure. Therefore, Exelon requests that the previous request be amended to include this revised depth sizing capability.

If you have any questions, please contact us.

Very truly yours,



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

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

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