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SECY-00-045  
RIS 2000-17

October 16, 2003

U. S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, DC 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: 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, 2002 to June 30, 2003. 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,



Ron J. DeGregorio  
Vice President - Limerick

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

A001

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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, 2002 and June 30, 2003 and require NRC notification.

Commitment change tracking number: 2003-005  
CT number: T04092  
Commitment source document: LGS response, dated 9/4/98, to NOV issued in NRC Inspection Report 50-352/98-04 and 50-353/98-04  
Change: Deleted

**Statement of violation:**

10 CFR 50.73 (a) requires the holder of an operating license for a nuclear power plant (licensee) shall submit a Licensee Event Report (LER) for any event of the type described in this paragraph within 30 days after the discovery of the event.

10 CFR 50.73 (a)(2) requires the licensee shall report: (i)(B) any operation or condition prohibited by the plant's Technical Specifications.

Contrary to the above, as of March 4, 1998, the licensee had not submitted an LER for a condition prohibited by the plant's Technical Specifications within 30 days after the discovery of the event. Specifically, on February 2, 1998, the licensee identified 20 safety related valves that had not been adequately tested in accordance with Technical Specifications 4.6.3.2 and this was not reported in an LER.

This is a Severity Level IV violation (Supplement I)

**Statement of commitment:**

Procedure LR-C-10 was revised to ensure a reportability determination is performed when additional concerns beyond the scope of the original condition are identified as part of ongoing generic reviews.

**Change to commitment:**

Commitment deleted.

**Justification for change:**

The Exelon corrective action program meets the industry-accepted standards associated with reportability (Rev.4, section 4.4). Reportability evaluations are a fundamental program element.

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Commitment change tracking number: 2003-006  
CT number: T04085  
Commitment source document: LGS response, dated 8/5/98, to NOV EA 98-141  
(Ref: NRC Inspection Reports 50-353/97-09 and 50-353/98-02)  
Change: Revised

**Statement of violation:**

10 CFR Part 50, Appendix B, Criterion XVI, "Corrective Action", requires, in part, that measures be established to assure that conditions adverse to quality, such as failures, malfunctions, and deficiencies are promptly identified and corrected. In the case of significant conditions adverse to quality, the measures shall assure that the cause of the condition is determined and corrective action taken to preclude repetition.

Contrary to the above, between January 8, 1998 and January 28, 1998, a condition adverse to quality existed, namely potential inoperability of HPCI exhaust valve due to internal binding, and although indications of this inoperability were provided when the valve failed to close on its first attempt on January 8, 1998, and subsequent data provided indications of such internal binding, measures were not established to assure that this significant condition adverse to quality was promptly corrected until the valve again failed on its first attempt when tested on January 28, 1998. As a result the HPCI valve was not maintained operable with a closing time less than or equal to 120 seconds contrary to Unit 1 TS 3.6.3.

Contrary to the above, between January 8, 1998 and January 28, 1998, a condition adverse to quality existed involving the inoperability of the 1B residual heat removal (RHR) minimum flow valve (HV-051-F007B) after it was found closed on four occasions, and during that period, adequate corrective actions were not taken to correct this condition adverse to quality in the although an equipment trouble tag was initiated in each case to address the anomalous valve operation, the system was considered operable without adequate basis for doing so. As a result the malfunctioning minimum flow valve caused the RHR pump to be inoperable and resulted in TS being violated.

These violations represent a Severity Level III problem (Supplement I).  
Civil Penalty - \$55,000.

Contrary to the above, between August 1994 and October 7, 1997, a condition adverse to quality existed, namely a reversed bearing on the D21 emergency diesel generator, and this condition adverse to quality was not promptly identified and corrected despite an opportunity to do so because of a previous reversed bearing on the D22 EDG at Limerick between December 1995 and May 1996.

This is a Severity Level IV violation (Supplement I).

**Statement of commitment:**

An evaluation of processes that serve as inputs to making operability determinations has been performed to ensure that these processes provide a proper interface with Operations. These include: A-C-901, "Control of Nonconformances," LR-C-10 "Performance Enhancement Program (PEP)," A-C-26, "Administrative Control for Processing Work Orders," and A-C-43, "Surveillance Testing Program." These procedures are being revised, as appropriate, to improve this interface.

**Change to commitment:**

The above commitment is being deleted. The remaining commitments related to the violations are not affected.

**Justification for change:**

The Exelon corrective action program meets the industry-accepted standards associated with this program. Operations interface is included as a fundamental program element.