

Exelon Nuclear
Limerick Generating Station
P.O. Box 2300
Pottstown, PA 19464

www.exeloncorp.com

Nuclear
RG 1.200

January 20, 2004

U.S. 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: Letter of Intent to Participate in Probabilistic Risk Assessment Quality Pilot Application Program

Reference: 1. Memorandum dated December 3, 2003, Peter C. Wen, NRR to Cathy Haney, NRR, Summary of November 20, 2003, "Meeting with Nuclear Energy Institute (NEI) Regarding Probabilistic Risk Assessment Quality Pilot Applications."
2. Memorandum dated November 19, 2003, J. L. Funches, CFO, NRR to James E. Dyer, Director, NRR, "Fee Waiver for Pilot Application of Approach Proposed in DG-1122, "Determining the Technical Adequacy of PRA Results for Risk-Informed Activities," and The Associated Draft Standard Review Plan (SRP) Section."

Dear Sir or Madam:

As requested at the meeting on November 20, 2003 (Reference 1), Exelon Generation Company, LLC (Exelon) submits this letter of intent to participate in the NRC probabilistic risk assessment pilot program to guide implementation of Regulatory Guide 1.200 For Trial Use, "An Approach for Determining the Technical Adequacy of Probabilistic Risk Assessment Results for Risk-Informed Activities," and the associated draft standard review plan, Chapter 19.1, "Determining the Technical Adequacy of Probabilistic Risk Assessment Results for Risk-Informed Activities."

The Regulatory Guide 1.200 pilot application which Exelon proposes to submit is a Limerick Generating Station License Amendment Request (LAR) to relocate surveillance test intervals to a licensee controlled program in accordance with Risk Informed Technical Specification Initiative 5b. Our current schedule for submitting the LAR is February 20, 2004.

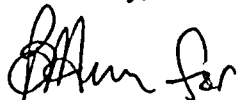
The NRC has indicated this review of pilot applications is eligible for a waiver of review fees (Reference 2). Our participation in this pilot program is contingent on the NRC granting a fee waiver for the full LAR review pursuant to 10 CFR Part 170.11(b)(1).

A001

January 16, 2004
U. S. Nuclear Regulatory Commission
Page 2

If you have any questions or desire additional information pertaining to this letter, please call Mr. Eugene M. Kelly at (610) 718-3520.

Sincerely,



Ron J. DeGregorio
Vice President, Limerick Generating Station

cc: H. J. Miller – Regional Administrator, NRC Region I
A. L. Burritt - NRC Senior Resident Inspector – Limerick Generating Station
S. Wall - NRC Project Manager – NRC NRR
P. C. Wen - NRC NRR
A. R. Pietrangelo – NEI
R. E. Bradley - NEI

bcc: R. DeGregorio, GML 5-1
B. Hanson, GML 5-1
C. Mudrick, SSB 3-1
R. Dickinson, SSB 3-3
E. Kelly, SSB 3-3
P. Tarpinian, SSB 3-3
K. Kemper, SSB 2-4
J. Toro, SSB 4-1
J. Meister, Cantera
D. Helker, KSA 3N
V. Warren, Erin Eng.