

May 3, 2004

LICENSEE: Exelon Generation Company, LLC (Exelon)  
FACILITY: Limerick Generating Station, Units 1 and 2 (LGS-1 and 2)  
SUBJECT: SUMMARY OF APRIL 08, 2004, PUBLIC MEETING WITH EXELON ON  
OPERATING REACTOR LICENSING ISSUES

On April 8, 2004, the U.S. Nuclear Regulatory Commission (NRC) staff held a meeting at the NRC Headquarters, One White Flint North, Rockville, Maryland, with representatives from Exelon, to discuss issues related to the Risk Management Technical Specifications (RMTS) Initiative 5b on Risk-Informed Surveillance Requirements. Pursuant to the Commission's Policy Statement on "Enhancing Public Participation in NRC Meetings," (67 FR 36920), dated May 28, 2002, the meeting was open to the public for observation and an opportunity to communicate with the NRC staff following the business portion of the meeting. One member of the public was in attendance. A list of attendees is provided as Attachment 1. The presentation handout that includes the agenda for the meeting is provided as Attachment 2. A supporting handout from the meeting is provided as Attachment 3.

The discussions with Exelon addressed the RMTS Initiative 5b methodology and the forthcoming license amendment requests (LARs) for the pilot plant LGS-1 and 2. The presentation focused on how LGS-1 and 2 intends to apply the methodology when conducting surveillance test interval (STI) adjustments. Exelon provided, as an example, an STI evaluation concerning the main steam isolation valve position (Attachment 3). It was noted by the NRC staff that the methodology seemed to concentrate on the process by which an STI could be extended. The NRC staff expressed concerns regarding the feedback mechanism that would allow for the reduction of an STI if new data became available. Exelon indicated that the surveillance program would have surrogate monitoring and periodic reviews to verify the appropriateness of the STI.

As a result of the meeting, the attendees agreed to the following action items:

1. Exelon noted that the probabilistic risk assessment (PRA) model and related documentation would be available to the NRC staff via the Nuclear Energy Institute (NEI) archives. This paralleled the arrangements made with the NRC staff for the Regulatory Guide (RG) 1.200, "An Approach for Determining the Technical Adequacy Of Probabilistic Risk Assessment Results For Risk-Informed Activities," PRA reviews. The NRC staff agreed to verify the appropriateness of this arrangement and provide guidance on the scope of PRA information that should be submitted with the forthcoming LARs for LGS-1 and 2.

CONTACT: S. Wall, NRR  
301-415-2855  
spw@nrc.gov

After internal consideration, the NRC staff has requested that summaries and supporting risk assessments of the six Limerick pilot surveillance requirement frequency evaluations be provided directly to the staff at NRC headquarters. Since the requested information deals with only six evaluations, and not the multitude of cases required for RG 1.200 reviews, it is felt that what will be provided is commensurate with normal LARs and not unduly burdensome.

2. The Application-Specific PRA Audit and review of the implementation of the STI evaluation process for the Initiative 5b Pilot will be conducted after receipt of the LGS-1 and 2 submittal. Site visits for the RG 1.200 PRA Quality and Application-Specific PRA audits, and observations of the application of the STI evaluation process will be necessary. The NRC staff agreed to provide Exelon additional details of the site visit currently scheduled for July 2004.
3. Exelon indicated that the STI evaluation process would involve a panel of experts. Representatives from Excel Services Corporation (Excel) agreed to provide an implementation guidance document to address such issues as the level of training and certification necessary to become a member of this panel.

Members of the public were in attendance; but, no questions were asked. Public meeting feedback forms were available; however, no forms have been received.

Please direct any inquiries to Scott P. Wall at 301-415-2855, or [spw@nrc.gov](mailto:spw@nrc.gov).

*/RA/*

Scott P. Wall, Project Manager, Section 2  
Project Directorate I  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Docket Nos. 50-352 and 50-353

Attachments: 1. List of Attendees  
2. Exelon's Presentation Material  
3. Surveillance Test Interval Evaluation

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**/RA/**

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Accession Number: ML041190275

Meeting Announcement: ML04086004

Attachment No. 2: ML

Attachment No. 3: ML

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**OFFICIAL RECORD COPY**

Limerick Generating Station, Unit Nos. 1 and 2

cc:

Chief Operating Officer  
Exelon Generation Company, LLC  
4300 Winfield Road  
Warrenville, IL 60555

Site Vice President  
Limerick Generating Station  
Exelon Generation Company, LLC  
P.O. Box 2300  
Sanatoga, PA 19464

Plant Manager  
Limerick Generating Station  
Exelon Generation Company, LLC  
P.O. Box 2300  
Sanatoga, PA 19464

Regulatory Assurance Manager - Limerick  
Exelon Generation Company, LLC  
P.O. Box 2300  
Sanatoga, PA 19464

Senior Vice President - Nuclear Services  
Exelon Generation Company, LLC  
4300 Winfield Road  
Warrenville, IL 60555

Vice President - Mid-Atlantic Operations  
Exelon Generation Company, LLC  
200 Exelon Way, KSA 3-N  
Kennett Square, PA 19348

Vice President - Operations Support  
Exelon Generation Company, LLC  
4300 Winfield Road  
Warrenville, IL 60555

Vice President  
Licensing and Regulatory Affairs  
Exelon Generation Company, LLC  
4300 Winfield Road  
Warrenville, IL 60555

Director Licensing  
Exelon Generation Company, LLC  
Nuclear Group Headquarters  
Correspondence Control  
P. O. Box 160  
Kennett Square, PA 19348

Manager Licensing  
Limerick and Peach Bottom  
Exelon Generation Company, LLC  
Nuclear Group Headquarters  
Correspondence Control  
P.O. Box 160  
Kennett Square, PA 19348

Vice President  
General Counsel and Secretary  
Exelon Generation Company, LLC  
2301 Market Street, S23-1  
Philadelphia, PA 19101

Correspondence Control Desk  
Exelon Generation Company, LLC  
200 Exelon Way, KSA 1-N-1  
Kennett Square, PA 19348

Regional Administrator, Region I  
U.S. Nuclear Regulatory Commission  
475 Allendale Road  
King of Prussia, PA 19406

Senior Resident Inspector  
U.S. Nuclear Regulatory Commission  
Limerick Generating Station  
P.O. Box 596  
Pottstown, PA 19464

Library  
U.S. Nuclear Regulatory Commission  
Region I  
475 Allendale Road  
King of Prussia, PA 19406

Limerick Generating Station, Unit Nos. 1 and 2

cc:

Chief-Division of Nuclear Safety  
PA Dept. of Environmental Resources  
P.O. Box 8469  
Harrisburg, PA 17105-8469

Chairman  
Board of Supervisors  
of Limerick Township  
646 West Ridge Pike  
Linfield, PA 19468

Dr. Judith Johnsrud  
National Energy Committee  
Sierra Club  
433 Orlando Avenue  
State College, PA 16803

Mr. Christopher M. Crane  
President and Chief Nuclear Officer  
Exelon Nuclear  
Exelon Generation Company, LLC  
200 Exelon Way, KSA 3-E  
Kennett Square, PA 19348

**List of Attendees**  
**NRC Meeting with Exelon Generating Company, LLC**  
**Risk-Informed Technical Specifications - Initiative 5b on Licensing Activities**

**Thursday, April 8, 2004**  
**9:30 a.m. - 12:00 p.m.**  
**Room: O-13B4**

<b>Name</b>	<b>Organization</b>	<b>Phone Number</b>
Scott Wall	NRC	301-415-2855
Tom Boyce	NRC	301-415-0184
Bob Tjader	NRC	301-415-1187
Carl Schulten	NRC	301-415-1192
Wayne Scott	NRC	301-415-1020
Gareth Parry	NRC	301-415-1464
David Shum	NRC	301-415-2860
Nick Saltos	NRC	301-415-1072
Millard Wohl	NRC	301-415-1181
Donnie Harrison	NRC	301-415-3587
Stu Magruder	NRC	301-415-3139
A. El-Bussioni	NRC	301-415-1094
David Helker	EXELON	610-765-5525
Gene Kelly	EXELON	610-718-3520
Glenn Stewart	EXELON	610-765-5529
Phil Tarpinian	EXELON	610-718-2834
Biff Bradley	NEI	202-739-8083
Don Vanover	ERIN ENGINEERING, USA	610-431-8360
Donald R. Hoffman	EXCEL	301-984-4400
Brian Mann	EXCEL	301-984-4400
Don McCamy	TENNESSEE VALLEY AUTHORITY	256-729-2474
Deann Raleigh	SCIENTECH	240-626-9556