

July 8, 2004

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

SUBJECT: LIMERICK GENERATING STATION - NOTIFICATION OF CONDUCT OF A
TRIENNIAL FIRE PROTECTION BASELINE INSPECTION

Dear Mr. Crane:

The purpose of this letter is to notify you that the U.S. Nuclear Regulatory Commission (NRC) Region I staff will conduct a triennial fire protection baseline inspection at the Limerick Generating Station in October, 2004. The inspection team will be led by Mr. Larry Scholl, a senior reactor inspector from the NRC Region I Office. The team will be composed of NRC personnel. The inspection will be conducted in accordance with IP 71111.05, the NRC's baseline fire protection inspection procedure.

The schedule for the inspection is as follows:

- Information gathering visit - Week of August 30, 2004
- Onsite inspection - Weeks of October 4 and 18, 2004

The purposes of the information gathering visit are to obtain information and documentation needed to support the inspection, to become familiar with the Limerick Generating Station fire protection programs, fire protection features, and post-fire safe shutdown capabilities and plant layout, and, as necessary, obtain plant specific site access training and badging for unescorted site access. The types of documents the team may be interested in reviewing, and possibly obtaining, are listed in Enclosure 1. The inspection team leader will contact you with specific document requests and inform you of plant areas for inspection focus.

During the information gathering visit, the team will also discuss the following inspection support administrative details: office space size and location; specific documents requested to be made available to the team in their office spaces; arrangements for reactor site access (including radiation protection training, security and safety); and the availability of knowledgeable plant engineering and licensing organization personnel to serve as points of contact during the inspection.

We request that during the onsite inspection you ensure that copies of analyses, evaluations or documentation regarding the implementation and maintenance of the Limerick Generating Station fire protection program, including post-fire safe shutdown capability, be readily accessible to the team for their review. Of specific interest are those documents which establish that your fire protection program satisfies NRC regulatory requirements and conforms to applicable NRC and industry fire protection guidance. Also, personnel should be available at the site during the inspection who are knowledgeable regarding those plant systems required to achieve and maintain safe shutdown conditions from inside and outside the control room (including the electrical aspects of the relevant post-fire safe shutdown analyses), reactor plant fire protection systems and features, and the Limerick Generating Station fire protection program and its implementation.

Your cooperation and support during this inspection will be appreciated. If you have questions concerning this inspection, or the inspection team's information or logistical needs, please contact Mr. Larry Scholl, the team leader, in the Region I Office at (610) 337-5144 or by e-mail at LLS@nrc.gov.

Sincerely,

/RA/

Marvin Sykes, Acting Chief
Electrical Branch
Division of Reactor Safety

Docket Nos. 50-352; 50-353
License Nos. NPF-39, NPF-85

Enclosure: List of Reactor Fire Protection Program Supporting Documents

cc:

Chief Operating Officer, Exelon Generation Company, LLC
Site Vice President - Limerick Generating Station
Plant Manager, Limerick Generating Station
Regulatory Assurance Manager - Limerick
Senior Vice President - Nuclear Services
Vice President - Mid-Atlantic Operations
Vice President - Operations Support
Vice President - Licensing and Regulatory Affairs
Director - Licensing and Regulatory Affairs, Exelon Generation Company, LLC
Manager, Licensing - Limerick Generating Station
Vice President, General Counsel and Secretary
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Chairman, Board of Supervisors of Limerick Township
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DATE	07/06/04		07/07/04				

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ENCLOSURE 1
Reactor Fire Protection Program Supporting Documentation

[Note: This is a broad list of the documents the NRC inspection team may be interested in reviewing, and possibly obtaining, during the information gathering site visit.]

1. The current version of the Fire Protection Program and Fire Hazards Analysis.
2. Current versions of the fire protection program implementing procedures (e.g., administrative controls, surveillance testing, fire brigade, technical requirements manual).
3. Fire brigade training program and pre-fire plans.
4. Post-fire safe shutdown analysis, including systems and separation analysis, as well as alternative shutdown analysis.
5. Piping and instrumentation (flow) diagrams for fire protection suppression systems.
6. Piping and instrumentation (flow) diagrams showing the components used to achieve and maintain hot standby and cold shutdown for fires outside the control room and those components used for those areas requiring alternative shutdown capability.
7. Plant layout and equipment drawings which identify the physical plant locations of hot standby and cold shutdown equipment.
8. Plant layout drawings which identify plant fire area delineation, areas protected by automatic fire suppression and detection, and the locations of fire protection equipment.
9. Plant layout drawings which identify the general location of the post-fire emergency lighting units.
10. Plant operating procedures which would be used and describe shutdown from inside the control room with a postulated fire occurring in any plant area outside the control room, and procedures which would be used to implement alternative shutdown capability in the event of a fire in either the control or cable spreading room (or any other alternative shutdown area).
11. Maintenance and surveillance testing procedures for alternative shutdown capability and fire barriers, detectors, pumps and suppression systems.
12. Maintenance procedures which routinely verify fuse and circuit breaker coordination in accordance with the post-fire safe shutdown coordination analysis.
13. Significant fire protection and post-fire safe shutdown related design change packages (including the associated 10 CFR 50.59 evaluations) and Generic Letter 86-10 evaluations.

14. The reactor plant's IPEEE, results of any post-IPEEE reviews, and listings of actions taken/plant modifications conducted in response to IPEEE information associated with fires.
15. Procedures/instructions that govern the implementation of plant modifications, temporary modifications, maintenance, and special operations, and their impact on fire protection.
16. Organization charts of site personnel down to the level of fire protection staff personnel.
17. Listing of plant fire protection licensing basis documents (i.e., a listing of the SERs and change evaluations which form the licensing basis for the reactor plant's post-fire safe shutdown configuration).
18. Procedures/instructions that control the configuration of the reactor plant's fire protection program, features, and post-fire safe shutdown methodology and system design.
19. A list of applicable codes and standards related to the design of plant fire protection features and evaluations of code deviations (i.e., a listing of the NFPA code versions committed to (NFPA codes of record)).
20. A listing of all open condition reports associated with fire protection or Appendix R safe shutdown issues (problem reports/NCRs/EARs/problem identification and resolution reports).
21. A listing of condition reports associated with fire protection or Appendix R safe shutdown issues (problem reports/NCRs/EARs/problem identification and resolution reports) that have been closed within the last three years.
22. The three most recent fire protection QA audits and/or fire protection self-assessments.
23. Copies of QA surveillances of fire protection activities performed in the last three years.
24. Electrical one-line drawings showing the power supplies (normal and emergency) for hot standby and cold shutdown equipment (including instrumentation and control circuits necessary for safe shutdown).