

October 8, 2004

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

SUBJECT: LIMERICK GENERATING STATION, UNITS 1 AND 2 (LGS 1 and 2) -
REQUEST FOR ADDITIONAL INFORMATION RE: PROPOSED CHANGES TO
CONTROL ROD REQUIREMENTS (TAC NOS. MC3847 AND MC3848)

Dear Mr. Crane:

By application dated July 22, 2004, Exelon Generation Company, LLC (Exelon), requested license amendments for LGS 1 and 2, related to control rod operability and surveillance requirements specified in Technical Specification 3/4.1.3, "Control Rods."

The Nuclear Regulatory Commission (NRC) staff is reviewing the request and has determined that additional information is needed to complete the review. The specific information requested is addressed in the questions enclosed with this letter.

Per prior discussions with Mr. Dave Helker of your staff, it is requested that you provide the requested information within 30 days from the date of this letter. If circumstances result in the need to revise the response date, please contact me at (301) 415-8474.

Sincerely,

/RA/

Travis L. Tate, Project Manager, Section 2
Project Directorate I
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket Nos. 50-352 and 50-353

Enclosure: Request for Additional Information

cc w/encl: See next page

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REQUEST FOR ADDITIONAL INFORMATION

LIMERICK GENERATING STATION, UNITS 1 AND 2 (LGS 1 and 2)

REQUEST FOR LICENSE AMENDMENTS RELATED TO

PROPOSED CHANGES TO CONTROL ROD REQUIREMENTS

1. In the July 22, 2004, submittal, it is indicated that the proposed changes are consistent with NUREG-1433, Rev. 2, "Standard Technical Specifications - General Electric Plants, BWR/4." The proposed change to Technical Specification (TS) 3.1.3.1.b.1.b involves the removal of the statement, "by drive water pressure within the normal operating range," from the Limiting Condition for Operation (LCO) statement. The NRC staff's review determined that the change to the proposed LCO is not consistent with the corresponding Standard Technical Specification (STS) 3.1.3.C of NUREG-1433, Rev. 2. LGS 1 and 2 TS 3.1.3.1.b.1.b requires that the insertion capability of a trippable but inoperable control rod be demonstrated by inserting the control rod one notch. STS 3.1.3.C requires the an inoperable control rod be fully inserted within 3 hours and the control rod drive is to be disarmed within 4 hours. The STS does not have a provision to allow an inoperable control rod to remain in a withdrawn position. The proposed change would remove the restriction on the drive water pressure. Please explain why the higher control rod drive pressure is not an indicator of a condition that inhibits the safety function of the control rod as indicated in Section 3.0, page 5, of the submittal. Provide a justification for why a required higher drive pressure, in addition to a condition that results in a rod being declared inoperable, is not the result of degradation that prohibits a rods' insertion capability.
2. TS 3.1.3.b.1.b uses the term "trippable" to distinguish the condition of an inoperable control rod. However, the associated TS Bases does not define the criteria used to declare an inoperable control rod as trippable. Please explain the criteria used to declare inoperable control rods as trippable. Explain the impact of the proposed change to remove the restriction on the drive water pressure on the trippable criteria.
3. Please explain whether or not the associated TS Bases section will require modifications as a result of the proposed changes.

Enclosure