April 18, 2005

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

SUBJECT: LIMERICK GENERATING STATION, UNITS 1 AND 2 - ISSUANCE OF AMENDMENT RE: CHANGES TO THE REACTOR COOLANT SYSTEM CHEMISTRY AND SPECIFIC ACTIVITY REQUIREMENTS (TAC NOS. MC1415 AND MC1416)

Dear Mr. Crane:

The Commission has issued the enclosed Amendment No. 174 to Facility Operating License No. NPF-39 and Amendment No. 136 to Facility Operating License No. NPF-85 for the Limerick Generating Station (LGS) Unit Nos. 1 and 2, respectively. These amendments are in response to your application dated November 25, 2003.

The amendments revise Technical Specifications (TSs) sections 3/4.4.4, “Reactor Coolant System - Chemistry” and 3/4.4.5, “Specific Activity” for LGS, Unit Nos. 1 and 2. Specifically, the amendments relocate TS 3/4.4.4 in its entirety from the TSs to the Technical Requirements Manual (TRM) and delete TS 3/4.4.5 requirements related to E-bar, gross beta, and gross gamma.

A copy of our safety evaluation is also enclosed. Notice of Issuance will be included in the Commission's biweekly *Federal Register* notice.

Sincerely,

/RA/

Travis 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

Enclosures: 1. Amendment No. 174 to License No. NPF-39
2. Amendment No. 136 to License No. NPF-85
3. Safety Evaluation

cc w/encls: See next page

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Dear Mr. Crane:

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The amendments revise Technical Specifications (TSs) sections 3/4.4.4, "Reactor Coolant System - Chemistry" and 3/4.4.5, "Specific Activity" for LGS, Unit Nos. 1 and 2. Specifically, the amendments relocate TS 3/4.4.4 in its entirety from the TSs to the Technical Requirements Manual (TRM) and delete TS 3/4.4.5 requirements related to E-bar, gross beta, and gross gamma.

A copy of our safety evaluation is also enclosed. Notice of Issuance will be included in the Commission's biweekly *Federal Register* notice.

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Docket Nos. 50-352 and 50-353

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cc w/encls: See next page

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Official Record Copy
EXELON GENERATION COMPANY, LLC

DOCKET NO. 50-352

LIMERICK GENERATING STATION, UNIT 1

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 174
License No. NPF-39

1. The Nuclear Regulatory Commission (the Commission) has found that:

   A. The application for amendment by Exelon Generation Company, LLC (the licensee) dated November 25, 2003, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;

   B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;

   C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;

   D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and

   E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.(2) of Facility Operating License No. NPF-39 is hereby amended to read as follows:

   Technical Specifications

   The Technical Specifications contained in Appendix A and the Environmental Protection Plan contained in Appendix B, as revised through Amendment No. 174, are hereby incorporated in the license. Exelon Generation Company shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. This license amendment is effective as of its date of issuance and shall be implemented within 30 days.

FOR THE NUCLEAR REGULATORY COMMISSION

/RA by R. Ennis for /

Darrell J. Roberts, Chief, Section 2
Project Directorate I
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Attachment: Changes to the
Technical Specifications

Date of Issuance: April 18, 2005

ATTACHMENT TO LICENSE AMENDMENT NO. 174

FACILITY OPERATING LICENSE NO. NPF-39

DOCKET NO. 50-352

Replace the following pages of the Appendix A Technical Specifications with the attached revised pages. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change.

Remove	Insert
xi	xi
1-2	1-2
3/4 4-12	3/4 4-12
3/4 4-13	-
3/4 4-14	-
3/4 4-15	3/4 4-15
3/4 4-17	3/4 4-17
B 3/4 4-3e	B 3/4 4-3e
B 3/4 4-4	B 3/4 4-4

EXELON GENERATION COMPANY, LLC

DOCKET NO. 50-353

LIMERICK GENERATING STATION, UNIT 2

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 136
License No. NPF-85

1. The Nuclear Regulatory Commission (the Commission) has found that:

   A. The application for amendment by Exelon Generation Company, LLC (the licensee) dated November 25, 2003, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;

   B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;

   C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;

   D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and

   E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.(2) of Facility Operating License No. NPF-85 is hereby amended to read as follows:

   Technical Specifications

   The Technical Specifications contained in Appendix A and the Environmental Protection Plan contained in Appendix B, as revised through Amendment No. 136, are hereby incorporated in the license. Exelon Generation Company shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. The license amendment is effective as of its date of issuance and shall be implemented within 30 days.

FOR THE NUCLEAR REGULATORY COMMISSION

/RA by R. Ennis for/

Darrell J. Roberts, Chief, Section 2
Project Directorate I
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Attachment: Changes to the
Technical Specifications

Date of Issuance: April 18, 2005

ATTACHMENT TO LICENSE AMENDMENT NO. 136

FACILITY OPERATING LICENSE NO. NPF-85

DOCKET NO. 50-353

Replace the following pages of the Appendix A Technical Specifications with the attached revised pages. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change.

Remove	Insert
xi	xi
1-2	1-2
3/4 4-12	3/4 4-12
3/4 4-13	-
3/4 4-14	-
3/4 4-15	3/4 4-15
3/4 4-17	3/4 4-17
B 3/4 4-3e	B 3/4 4-3e

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NOS. 174 AND 136 TO FACILITY OPERATING

LICENSE NOS. NPF-39 AND NPF-85

EXELON GENERATION COMPANY, LLC

LIMERICK GENERATING STATION, UNITS 1 AND 2

DOCKET NOS. 50-352 AND 50-353

1.0 INTRODUCTION

By application dated November 25, 2003, Agencywide Document Access and Management System (ADAMS) accession number ML033430494, Exelon Generation Company, LLC (the licensee), requested changes to the Technical Specifications (TSs) for Limerick Generating Station (LGS), Units 1 and 2. The proposed changes would revise TSs sections 3/4.4.4, "Reactor Coolant System - Chemistry" and 3/4.4.5, "Specific Activity" for LGS, Units 1 and 2. Specifically, the amendments would relocate TS 3/4.4.4 in its entirety from the TSs to the Technical Requirements Manual (TRM) and delete TS 3/4.4.5 requirements related to E-bar, gross beta, and gross gamma. The proposed changes are also consistent with NUREG-1433, "Standard Technical Specifications (STS), General Electric Plants, BWR/4."

2.0 REGULATORY EVALUATION

Section 182a of the Atomic Energy Act requires applicants for nuclear power plant operating licenses to include TSs as part of the license. The Commission's regulatory requirements related to the content of the TSs are set forth in Title 10 of the *Code of Fedeal Regulation* (10 CFR), Section 50.36. This regulation requires that the TSs include items in five specific categories. These categories include (1) safety limits, limiting safety system settings and limiting control settings, (2) limiting conditions for operation (LCO), (3) surveillance requirements, (4) design features, and (5) administrative controls. However, the regulation does not specify the particular TSs requirements to be included in a plant's license.

Additionally, 10 CFR 50.36(c)(2)(ii) sets forth four criteria to be used in determining whether an LCO is required to be included in the TS. These criteria are as follows: (1) installed instrumentation that is used to detect, and indicate in the control room, a significant abnormal degradation of the reactor coolant pressure boundary; (2) a process variable, design feature, or operating restriction that is an initial condition of a design basis accident or transient analysis that either assumes the failure of or presents a challenge to the integrity of a fission product boundary; (3) a structure, system, or component [SSC] that is part of the primary success path and which functions or actuates to mitigate a design basis accident or transient that either assumes the failure of or presents a challenge to the integrity of a fission product boundary;

(4) a [SSC] which operating experience or probabilistic risk assessment has shown to be significant to public health and safety. LCOs and related requirements that fall within or satisfy any of the criteria in the regulation must be retained in the TSs, while those requirements that do not fall within or satisfy these criteria may be relocated to licensee-controlled documents.

Part 100 of 10 CFR establishes approval requirements for proposed sites for stationary power subject to 10 CFR Part 50. Siting factors and criteria are important in assuring that radiological doses from normal operation and postulated accidents will be acceptably low. Section 100.11 requires that, as an aid in evaluating a proposed site, an applicant should assume a fission product release from the core, the expected demonstrable leak rate from the containment and the meteorological conditions pertinent to the site to derive an exclusion area and a low population zone. Section 100.11 specifically requires: (1) an exclusion area of such size that an individual located at any point on its boundary for two hours immediately following onset of the postulated fission product release would not receive a total radiation dose to the whole body in excess of 25 rem or a total radiation dose in excess of 300 rem to the thyroid from iodine exposure, and (2) a low population zone of such size that an individual located at any point on its outer boundary who is exposed to the radioactive cloud resulting from the postulated fission product release (during the entire period of its passage) would not receive a total radiation dose to the whole body in excess of 25 rem or a total radiation dose in excess of 300 rem to the thyroid from iodine exposure.

NUREG-1433, contains the improved STS for General Electric (GE) BWR/4 plants. The improved STS were developed based on the criteria in the “Final Commission Policy Statement on Technical Specifications Improvements for Nuclear Power Reactors,” which was subsequently codified by changes to 10 CFR 50.36 (60 FR 36953). The improved STSs are used as the basis for developing improved plant-specific TSs and support the review of requests made in accordance with this regulatory guidance. Licensees adopting portions of the improved STS to existing TSs should adopt all related requirements as applicable, to achieve a high degree of standardization and consistency.

3.0 TECHNICAL EVALUATION

3.1 Reactor Coolant Chemistry

The licensee proposed to relocate the RCS chemistry requirements in TS 3/4.4.4 to the TRM. These requirements are established to prevent damage of the reactor materials in contact with the reactor coolant. The surveillance requirements (SRs) are established to provide adequate assurance that as-found conditions in the RCS in excess of the required limits are detected in sufficient time to take corrective actions. The licensee’s proposed changes to the TSs for RCS chemistry, are as follows:

- Delete TS Index, 3/4.4.4, “CHEMISTRY,”
- Relocate TS 3/4.4.4, “CHEMISTRY,” including TS Table 3.4.4-1 to the TRM.
- Relocate TS Bases 3/4.4.4, “CHEMISTRY,” to the TRM.

In its application, the licensee evaluated the existing TSs against the four criterion set forth in 10 CFR 50.36(c)(2)(ii) as follows:

(1) The RCS chemistry parameters of conductivity, chloride concentration and pH are not used to detect, and indicate in the control room, a significant abnormal degradation of the reactor coolant pressure boundary. The current TS[s] provide limits on particular chemical properties and surveillance requirements to monitor these properties to ensure that degradation of the reactor coolant pressure boundary is not exacerbated by poor chemistry. However, degradation of the reactor coolant pressure boundary is a long term process. Other regulations and TS[s] provide direct means to monitor and correct the degradation of the reactor coolant pressure boundary; for example, in-service inspection and primary coolant leakage limits.

(2) The RCS chemistry parameters of conductivity, chloride concentration and pH are not used as an initial condition of a design basis accident or transient analysis that either assumes the failure of or presents a challenge to the integrity of a fission product barrier.

(3) The RCS chemistry parameters of conductivity, chloride concentration and pH are not SSCs used as part of the primary success path and do not function or actuate to mitigate a design basis accident or transient that either assumes the failure of or presents a challenge to the integrity of a fission product barrier.

(4) Operating experience or probabilistic safety assessments have not shown RCS chemistry parameters of conductivity, chloride concentration and pH to be significant to public health and safety.

The staff evaluated the proposed change to TS 3/4.4.4 against the four criteria set forth in 10 CFR 50.36 and determined that the RCS chemistry requirements are not a form of instrumentation nor an SSC. Therefore, the requirements do not meet Criterion 1, 3, or 4. Additionally, the staff determined that the RCS chemistry requirements are operating restrictions. However, these operating restrictions are not an initial condition for a design-basis accident (DBA) or transient analysis. Therefore, the staff determined that the RCS chemistry requirements do not meet Criterion 2 for inclusion in the TSs.

The staff agrees with the licensee's determination that TS 3/4.4.4 does not satisfy the criterion in 10 CFR 50.36(c)(2)(ii); and therefore, concludes that the relocation of the RCS chemistry requirements to the TRM is acceptable. The licensee stated that the RCS chemistry requirements, including the LCO, SRs and bases will be relocated to the TRM, which has been incorporated into the Updated Final Safety Analysis Report (UFSAR) by reference. Therefore, any changes to these requirements will be controlled by the provisions of 10 CFR 50.59.

3.2 RCS Specific Activity

The licensee proposed the following changes to TS 3/4.4.5 for RCS specific activity:

- Delete TS Definition 1.10 "Average Disintegration Energy."

- Delete TS LCO 3.4.5.b.
- Delete TS Action 3.4.5.a.2.
- Delete the phrase “or greater than 100/E-bar microcuries per gram” from TS Action 3.4.5.b.
- Delete TS Table 4.4.5-1, Item 1.
- Delete TS Table 4.4.5-1, Item 3 and associated footnote.
- Revise TS Table 4.4.5-1, Item 2, required isotopic analysis for Dose Equivalent I-131 frequency from at least once per 31 days to once per 7 days.

During operations, the release of fission products from fuel leaks and the activation of corrosion products may result in radioactive materials contamination in the reactor coolant. Consequently, the release of reactor coolant during a DBA could result in a release of radioactive materials into the environment. Therefore, limits on the maximum allowable level of radioactivity in the reactor coolant are established to ensure that in the event of a release of reactor coolant containing radioactive material to the environment during a DBA, the radiation doses are maintained within the limits of 10 CFR Part 100.

The LGS 1 and 2 TSs are custom specifications. LGS 1 and 2 TS 3.4.5, provides 5 limitations on the specific activity of the RCS expressed in terms of DOSE EQUIVALENT I-131 and “AVERAGE DISINTEGRATION ENERGY (E-bar)”. E-bar is the average, weighted in proportions to the concentration of each radionuclide in the reactor coolant at the time of sampling, of the sum of the average beta and gamma energies per disintegration in MeV for isotopes, with half lives greater than 15 minutes, making up at least 95% of the total noniodinic activity in the coolant. These limitations ensure that the 2-hour thyroid and whole-body doses resulting from a main steamline failure outside the containment during steady state operation will not exceed small fractions of the dose guidelines of 10 CFR Part 100.

Prompt detection of fuel failure and iodine release is provided by radiation monitoring of the offgas stream. Radiation monitoring of the main condenser offgas, as required by LGS 1 and 2 TS LCO 3.11.2.6, provides reasonable assurance that the reactor coolant gross specific activity is maintained at a sufficiently low level to preclude offsite doses from exceeding a small fraction of the limits of 10 CFR Part 100 in the event of a main steamline failure. As such, the LGS 1 and 2 TS LCO 3.4.5.b is redundant and the additional sampling and analysis required to demonstrate compliance with the 100/E-bar limit places an unnecessary burden on the licensee without a commensurate increase in safety. Additional assurance that the offsite doses will not exceed a small fraction of 10 CFR Part 100 limits is provided by increasing the frequency of sampling and analysis of the reactor coolant for Dose Equivalent I-131 from at-least-once per 31 days to at-least-once per 7 days. This frequency is consistent with that required by the STSs. Additionally, the licensee stated that boiling-water reactor (BWR) operating experience has demonstrated that the thyroid dose, i.e., Dose Equivalent I-131, is limiting and is more accurately determined. Therefore, any significant release to the reactor coolant is adequately monitored by the Dose Equivalent I-131 requirement. The staff has concluded that the proposed deletion of LCO 3.4.5.b and the associated Actions and SRs are acceptable due to the following:

1) the reactor coolant limit on Dose Equivalent I-131 adequately assures that offsite doses will not exceed small fractions of the limits of 10 CFR Part 100 in the event of a main steamline break outside of containment.

2) gross radioactivity rate of the noble gases measured at the recombiner after-condenser discharge is limited by LCO 3.11.2.6 to a value that provides reasonable assurance that the reactor coolant specific activity is maintained at a sufficiently low level to preclude offsite doses from exceeding a small fraction of 10 CFR Part 100 limits. In addition, the proposed deletion of LCO 3.4.5.b and the associated Actions and SRs are consistent with the intent of STS 3.4.7 of NUREG-1433, Revision 3.

3.3 Conclusion

The Nuclear Regulatory Commission (NRC) staff has reviewed the licensee's application with the supporting documentation. Based on its review, the NRC staff concludes that the proposed relocation of LCO 3/4.4.4, "Reactor Coolant System - CHEMISTRY," to the TRM is acceptable because the current LCO is not required to be in the TS under 10 CFR 50.36. In addition, the staff concludes that the proposed deletion of LCO 3.4.5.b and the associated Actions and SRs are acceptable because the limits for Dose Equivalent I-131 provide adequate assurance that the limits of 10 CFR Part 100 will be maintained. Additionally, the staff finds that sufficient regulatory controls exist under 10 CFR 50.59 to assure continued protection of public health and safety.

The licensee proposed that the associated TS Bases be relocated to the TRM. The NRC staff has reviewed these proposed changes and determined that the changes appropriately reflect the TS changes. Therefore, the NRC staff does not object to the proposed TS Bases changes. The licensee also proposed that TS Index Section 3/4.4.4, "Chemistry," and TS definition 1.10, the definition of E-bar, "Average Disintegration Energy" be deleted. The NRC staff determined that these changes are administrative in nature and does not object to the proposed TS changes.

4.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Pennsylvania State official was notified of the proposed issuance of the amendments. The State official had no comments.

5.0 ENVIRONMENTAL CONSIDERATION

The amendments change a requirement with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20 and change the surveillance requirements. The NRC staff has determined that the amendments involve no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendments involve no significant hazards consideration, and there has been no public comment on such finding (69 FR 7522). Accordingly, the amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to

10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendments.

6.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendments will not be inimical to the common defense and security or to the health and safety of the public.

The licensee proposed changes to the associated TS Bases. The NRC staff has reviewed these proposed changes and determined that they appropriately reflect the TS changes, therefore, the NRC staff does not object to the proposed bases changes.

Principal Contributors: Kerri Kavanagh
Yamir Diaz

Date: April 18, 2005