

SECY-00-045
RIS 2000-17

November 23, 2004

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 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: Annual Commitment Change Summary Report

This report summarizes Limerick changes to NRC commitments that meet the threshold for reporting for the period from July 1, 2003 to June 30, 2004. Changes to these commitments are performed using procedure LS-AA-110, Commitment Management, which employs the guidance provided in NEI 99-04, Guidelines for Managing NRC Commitment Changes. NEI 99-04 was approved by the NRC for licensee use by SECY-00-045, Acceptance of NEI 99-04, 'Guidelines for Managing NRC Commitments'. Licensees were informed that NEI 99-04 was an acceptable process for control of regulatory commitments by the issuance of RIS 2000-17, Managing Regulatory Commitments made by Power Reactor Licensees to the NRC Staff, on September 21, 2000.

If you have any questions or require additional information, please do not hesitate to contact us.

Sincerely,

Original signed by

Ron J. DeGregorio
Vice President - Limerick

cc: S. J. Collins, Administrator Region I, USNRC
S. L. Hansell, USNRC Senior Resident Inspector, LGS

LS-AA-110 Commitment Management, Section 4.6, "NRC Notification", requires submittal of a written report once per calendar year. This report shall contain a summary of commitment changes that require NRC notification.

The following commitment changes were implemented between July 1, 2003 and June 30, 2004 and require NRC notification.

Commitment change tracking number:	2003-012
CT number:	T04086
Commitment source document:	PECO response, dated 8/5/98, to NOV EA 98-141 (Ref: NRC Inspection Reports 50-353/97-09 and 50-353/98-02)
Change:	Deleted

Statement of violation:

10 CFR Part 50, Appendix B, Criterion XVI, "Corrective Action", requires, in part, that measures be established to assure that conditions adverse to quality, such as failures, malfunctions, and deficiencies are promptly identified and corrected. In the case of significant conditions adverse to quality, the measures shall assure that the cause of the condition is determined and corrective action taken to preclude repetition.

Contrary to the above, between August 1994 and October 7, 1997, a condition adverse to quality existed, namely a reversed bearing on the D21 emergency diesel generator, and this condition adverse to quality was not promptly identified and corrected despite an opportunity to do so because of a previous reversed bearing on the D22 EDG at Limerick between December 1995 and May 1996.

This is a Severity Level IV violation (Supplement I).

Statement of commitment:

Actions have been taken to reinforce the documentation of nonconforming conditions by the craftsmen and to reinforce the requirement to obtain written documentation of vendor recommendations and subsequent PECO Nuclear Engineering review of the recommendations.

Change to commitment:

The above commitment is being deleted. The remaining commitments related to the violation are not affected.

Justification for change:

The reinforcement to obtain written documentation vendor reviews and subsequent Engineering review is complete. Direction for processing vendor reviews is provided in procedure ER-AA-2030 Rev.2 Conduct Of Plant Engineering Manual.

Commitment change tracking number: 2004-007
CT number: T02665
Commitment source document: NUREG-0991 Safety Evaluation Report related to the operation of Limerick Generating Station, Units 1 and 2, August 1983
Change: Deleted

Statement of violation:
None

Statement of commitment:
NUREG-0991 Chapter 17 Quality Assurance, section 17.3, fifth paragraph states the following:
Audits are performed in accordance with pre-established written checklists by qualified personnel not having direct responsibilities in the areas being audited. Periodic audits will be performed to evaluate all aspects of the QA program, including the effectiveness of the QA program implementation. The QA program requires the review of audit results by the person having responsibility in the area audited to determine and take corrective action where necessary. Follow-up audits are performed to determine that nonconformances and deficiencies are effectively corrected and that the corrective action precludes repetitive occurrences.

Change to commitment:
Commitment deleted.

Justification for change:
This commitment has been superseded by the NRC approval of the current Exelon/AmerGen Quality Assurance Topical Report (QATR), which applies to Limerick and the remaining Exelon/AmerGen sites. Limerick implementation of the NRC approved regulatory audit program is described in the NRC approved QATR and implemented in accordance with NOS Procedure NO-AA-200-002 – Nuclear Oversight Regulatory Audit Procedure. In addition, the Exelon/AmerGen QATR is referenced in the Limerick Updated Final Safety Analysis Report (UFSAR) as the NRC approved QA Program.