

February 17, 2006

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, UNIT NOS. 1 AND 2 - ISSUANCE OF  
AMENDMENT RE: PRESSURE ISOLATION VALVE TABLE (TAC NOS.  
MC9306 AND MC9307)

Dear Mr. Crane:

The Commission has issued the enclosed Amendment No. 182 to Facility Operating License No. NPF-39 and Amendment No. 144 to Facility Operating License No. NPF-85 for the Limerick Generating Station, Units 1 and 2, respectively. These amendments consist of changes to the Technical Specifications (TSs) in response to your application dated December 21, 2005. These amendments revise the TSs by relocating the Pressure Isolation Valve Tables to the Technical Requirements Manual.

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/**

Richard V. Guzman, Project Manager  
Plant Licensing Branch I-I  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket Nos. 50-352 and 50-353

Enclosures:

1. Amendment No. 182 to License No. NPF-39
2. Amendment No. 144 to License No. NPF-85
3. Safety Evaluation

cc w/encls: See next page

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

Sincerely,  
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Richard V. Guzman, Project Manager  
Plant Licensing Branch I-1  
Division of Operating Reactor Licensing  
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EXELON GENERATION COMPANY, LLC

DOCKET NO. 50-352

LIMERICK GENERATING STATION, UNIT NO.1

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 182  
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 December 21, 2005, 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. 182, 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/*

Darrell J. Roberts, Chief  
Plant Licensing Branch I-2  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Attachment:  
Changes to the Technical Specifications

Date of Issuance: February 17, 2006

ATTACHMENT TO LICENSE AMENDMENT NO. 182

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

xi  
3/4 4-9  
3/4 4-10  
3/4 4-11  
B3/4 4-3e

Insert

xi  
3/4 4-9  
3/4 4-10  
3/4 4-11  
B3/4 4-3e

EXELON GENERATION COMPANY, LLC

DOCKET NO. 50-353

LIMERICK GENERATING STATION, UNIT NO. 2

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 144  
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 December 21, 2005, 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. 144, 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/*

Darrell J. Roberts, Chief  
Plant Licensing Branch I-2  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Attachment:  
Changes to the Technical Specifications

Date of Issuance: February 17, 2006

ATTACHMENT TO LICENSE AMENDMENT NO. 144

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

xi  
3/4 4-9  
3/4 4-10  
3/4 4-11  
B3/4 4-3e

Insert

xi  
3/4 4-9  
3/4 4-10  
3/4 4-11  
B3/4 4-3e



SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION  
RELATED TO AMENDMENT NOS. 182 AND 144 TO FACILITY OPERATING  
LICENSE NOS. NPF-39 AND NPF-85  
EXELON GENERATION COMPANY, LLC  
LIMERICK GENERATING STATION, UNIT NOS. 1 AND 2  
DOCKET NOS. 50-352 AND 50-353

## 1.0 INTRODUCTION

By application dated December 21, 2005, Exelon Generation Company, LLC (the licensee) requested changes to the Technical Specifications (TSs) for Limerick Generating Station, Unit Nos. 1 and 2. The proposed changes would revise the TSs by relocating the Pressure Isolation Valve (PIV) Tables to the Technical Requirements Manual (TRM).

## 2.0 REGULATORY EVALUATION

Title 10 of the *Code of Federal Regulations* (10 CFR) Section 50.36 specifies the criteria for including limiting conditions for operation (LCOs) in the TSs for commercial nuclear power reactors. According to 10 CFR 50.36, an LCO must be established for items that meet one or more of the following criteria:

Criterion 1: Installed instrumentation that is used to detect, and indicate in the control room, a significant degradation of the reactor coolant pressure boundary.

Criterion 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 barrier.

Criterion 3: A structure, system, or component 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 barrier.

Criterion 4: A structure, system, or component which operating experience or probabilistic risk assessment has shown to be significant to public health and safety.

In June 2004, the Nuclear Regulatory Commission (NRC or the Commission) issued Revision 3 to NUREG-1433, "Standard Technical Specifications, General Electric Plants (BWR [boiling-water reactor]/4)." On May 6, 1991, the NRC issued Generic Letter (GL) 91-08, "Removal of Component Lists from Technical Specifications." This GL contains guidance on removing component lists from plant TSs and relocating them to other licensee-controlled documents. In

accordance with 10 CFR 50.90, licensees can request amendments to their TSs, either to remove items that do not meet the criteria of 10 CFR 50.36 for inclusion, or for other reasons. These TS requirements may be relocated to other licensee-controlled documents.

### 3.0 TECHNICAL EVALUATION

The NRC staff issued GL-91-08 to give guidance on relocating component lists from TSs to licensee-controlled documents. A license amendment to relocate these component lists allows licensees to revise or update the lists in the future without having to apply for another license amendment. Changes to such lists, when relocated to licensee-controlled documents, are subject to review under the provisions of 10 CFR 50.59; therefore, a formal means of control over these lists still exists.

Enclosure 1 to GL- 91-08 contains specific issues that should be addressed by any request to remove component lists from plant TSs. The issues that should be addressed include:

- 1) an appropriate description of the scope of the components to which the TS requirements apply,
- 2) an incorporation into the TSs of any modifications or exceptions contained in notes to the table, and
- 3) a confirmation that the removed lists have been incorporated into appropriately-controlled plant procedures.

With respect to issue 1) above, Section B 3.4 of NUREG-1433 defines PIVs as any two normally closed valves in series within the reactor coolant pressure boundary (RCPB). The licensee has adopted this definition in their TRM. The removal of references to the PIV Table from the LCO, from the ACTION statement, and from the surveillance requirements (SRs) does not change the scope of components to which the TSs applies.

With respect to issue 2) above, the PIV table does not contain any notes. This consideration is, therefore, not applicable.

With respect to issue 3) above, the licensee stated in their application dated December 21, 2005, that they would ensure that the list of PIVs had been relocated to the TRM before they implement the proposed amendment. The TRM qualifies as an appropriately-controlled plant procedure.

After reviewing the licensee's application, the NRC staff has determined that the proposed amendment does not change any requirement with respect to PIVs. The TS LCOs and SRs apply to PIVs. The definition of what constitutes a PIV (that is, any two normally closed valves in series within the RCPB) is contained in the TRM. Changes to the TRM are controlled by 10 CFR 50.59. The relocation of the list of specific PIVs to the TRM is, therefore, an administrative change. The change has been made in accordance with the guidance of GL-91-08 and is consistent with NUREG-1433. The staff finds that the proposed change is acceptable.

### 4.0 FINAL NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

#### 4.1 Introduction

The Commission's regulations in 10 CFR 50.92 state that the Commission may make a final determination that a license amendment involves no significant hazards consideration if operation of the facility, in accordance with the amendment, would not: (1) involve a significant increase in the probability or consequences of an accident previously evaluated; or (2) create the possibility of a new or different kind of accident from any accident previously evaluated; or (3) involve a significant reduction in a margin of safety.

As required by 10 CFR 50.91(a), the licensee provided its analysis of the issue of no significant hazards consideration in its December 21, 2005, amendment request. The staff reviewed the licensee's analysis and, based on its review, it appeared that the three standards of 10 CFR 50.92(c) were satisfied. Therefore, the NRC staff proposed to determine that the amendment request involves no significant hazards consideration, and published its proposed determination in the *Federal Register* for public comment on January 17, 2006 (71 FR 2590).

The NRC staff has completed its evaluation of the licensee's proposed amendment as discussed in Section 3.0 above. Based on its evaluation, the staff has determined that the proposed amendment does not significantly increase the probability or consequences of an accident previously evaluated, does not create the possibility of a new or different kind of accident from any accident previously evaluated, and does not involve a significant reduction in a margin of safety. The following staff evaluation in relation to the three standards of 10 CFR 50.92 supports the staff's final no significant hazards consideration determination.

#### 4.2 First Standard

"Involve a significant increase in the probability or consequences of an accident previously evaluated."

The proposed change relocates a TS table of PIVs to the TRM and removes references to the table from the TSs. The TS LCO and SRs continue to apply to all PIVs. The definition of a PIV is located in the TRM; this definition is consistent with that in NUREG-1433 and includes those valves currently in the table. The relocation of this table has no impact on plant safety; therefore, the proposed amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated.

#### 4.3 Second Standard

"Create the possibility of a new or different kind of accident from any previously analyzed."

The proposed change involves relocating a TS table to the TRM. The amendment involves no physical changes to the plant and does not change the way in which any system or component performs its safety function; therefore, the proposed change does not create the possibility of a new or different kind of accident from any previously analyzed.

#### 4.4 Third Standard

"Involve a significant reduction in a margin of safety."

The proposed amendment relocates a TS PIV Table to the TRM. The amendment does not make any changes to the design, construction, or operation of the plant; furthermore, all LCOs and SRs will continue to apply. The change is administrative and has no impact on plant safety; therefore, the proposed change does not involve a significant reduction in a margin of safety.

On the basis of the above evaluation, the NRC staff concludes that the proposed amendment meets the three criteria of 10 CFR 50.92. Therefore, the staff has made a final determination that the proposed amendment does not involve a significant hazards consideration.

#### 5.0 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.

#### 6.0 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. 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 (71 FR 2590). 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.

#### 7.0 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.

Principal Contributor: G. Wunder

Date: February 17, 2006