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10 CFR 50.90

June 16, 2006

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

Limerick Generating Station, Unit 2
Facility Operating License No. NPF-85
NRC Docket No. 50-353

Subject: Response to Request for Additional Information
Exigent License Amendment Request
Proposed One-Time Change to the Drywell Average
Air Temperature Limit - Technical Specification 3.6.1.7

References: (1) Letter from P. B. Cowan, Exelon Generation Company, LLC, to U. S. Nuclear Regulatory Commission, License Amendment Request, "Exigent License Amendment Request; Proposed One-Time Change to the Drywell Average Air Temperature Limit - Technical Specification 3.6.1.7," dated June 9, 2006.

(2) Email from J. Kim, U.S. Nuclear Regulatory Commission, to G. Stewart, Exelon Generation Company, LLC, "Exigent LAR Questions," dated June 13, 2006.

In Reference 1, Exelon Generation Company, LLC (Exelon), requested a one-time change to the Technical Specifications (TS), Appendix A, of Facility Operating License No. NPF-85 for Limerick Generating Station (LGS), Unit 2. The proposed one-time change would revise TS Limiting Condition for Operation (LCO) 3.6.1.7 concerning drywell average air temperature. Specifically, the proposed change would add a footnote to the TS limit for drywell average air temperature of 145 degrees Fahrenheit (°F) to allow continued operation of LGS, Unit 2, with drywell average air temperature no greater than 148°F for the remainder of the current operating cycle (Cycle 9), which is currently scheduled to end in March 2007, or until the next shutdown of sufficient duration to allow for unit cooler fan repairs, whichever comes first.

In Reference 2, the NRC requested additional information concerning the LGS, Unit 2 License Amendment Request (LAR). A conference call was conducted on June 14, 2006, between Exelon (G. Stewart, et. al.) and the NRC (J. Kim, et. al.), to provide clarification on the request for additional information (RAI). The attachment to this letter restates the NRC questions, and provides Exelon's response to each question.

Exelon has concluded that the information provided in this response does not impact the conclusions of the: (1) Technical Analysis, (2) No Significant Hazards Consideration under the standards set forth in 10 CFR 50.92(c), or (3) Environmental Consideration as provided in the original submittal (Reference 1).

There are no regulatory commitments contained within this letter. If you have any questions or require additional information, please contact Glenn Stewart at 610-765-5529.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 16th day of June 2006.

Respectfully,

Ron J. DeGregorio
Vice President - LGS
Exelon Generation Company, LLC

Attachment: Response to Request for Additional Information

cc: Regional Administrator - NRC Region I w/ attachment
NRC Senior Resident Inspector - Limerick Generating Station "
NRC Project Manager, NRR - Limerick Generating Station "
Director, Bureau of Radiation Protection - Pennsylvania Department of Environmental Protection "

ATTACHMENT
EXIGENT LICENSE AMENDMENT REQUEST
DOCKET NO. 50-353
RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION

In Reference 1, Exelon Generation Company, LLC (Exelon), requested a one-time change to the Technical Specifications (TS), Appendix A, of Facility Operating License No. NPF-85 for Limerick Generating Station (LGS), Unit 2. The proposed one-time change would revise TS Limiting Condition for Operation (LCO) 3.6.1.7 concerning drywell average air temperature. Specifically, the proposed change would add a footnote to the TS limit for drywell average air temperature of 145 degrees Fahrenheit (°F) to allow continued operation of LGS, Unit 2, with drywell average air temperature no greater than 148°F for the remainder of the current operating cycle (Cycle 9), which is currently scheduled to end in March 2007, or until the next shutdown of sufficient duration to allow for unit cooler fan repairs, whichever comes first.

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Question 1.

"Please describe the root cause of failures of 2D1V212 cooler fans."

Response

As stated in the LAR, both of the fans (2D1V212 and 2D2V212) associated with the 2D-V212 unit cooler have failed and are out of service. To gain assess to each fan, a Unit 2 drywell entry during a unit shutdown is required. The next scheduled Unit 2 shutdown and drywell entry is not planned until March 2007 during the 2R09 refueling outage.

At the present time, Limerick has not yet identified a root cause of the 2D-V212 unit cooler fan failures. When fan access is obtained, a complete and thorough investigation of the cause will be performed. Although a root cause has not yet been identified, Limerick still has high confidence in the ability of the remaining unit coolers to continue to perform their intended safety related and non-safety related design functions. This position is based on the following:

1. Each unit cooler is provided with two 100% redundant fans. During normal operation one fan is normally operating and the redundant fan is in standby. On a loss of the operating fan, the standby fan will automatically start to maintain the design function.

2. The fans associated with the safety related unit coolers (2A-V212, 2B-V212, 2G-V212 and 2H-V212) are tested once every quarter in accordance with Technical Specifications (TS) Surveillance Requirement (SR) 4.6.6.2 to demonstrate operability of each unit cooler fan.

3. Each unit cooler fan was designed for continuous or intermittent service with a 40 year useful life expectancy.

4. A review of the operating experience for Unit 2 (17 years) as well as Unit 1 (20 years), has shown that this is the first time that both fans in the same unit cooler have been out of service. Additionally, the unit cooler fans currently in service are performing as designed and are maintaining the drywell average air temperature below the allowable limit.

Question 2.

"Please confirm 2D1V212 cooler fans are not safety related, i.e., these fans are not credited for safe shutdown during DBAs."

Response

LGS Updated Final Safety Analysis Report (UFSAR), Section 9.4.5.2, provides a description of the drywell air cooling system at LGS, and indicates that the drywell air cooling system serves two purposes: (1) to remove heat from the drywell during normal plant operations, and (2) to maintain air circulation in the drywell under accident conditions.

Section 9.4.5.2.3 states that the safety-related function of the drywell air cooling system is to maintain the drywell atmosphere in a thoroughly mixed condition after a Loss-of-Coolant Accident (LOCA) to prevent stratification of hydrogen and oxygen that may be generated as a result of the accident. In addition, this section of the UFSAR specifically identifies the 2A-V212, 2B-V212, 2G-V212, and 2H-V212 unit coolers as the safety-related portion of the drywell air cooling system. The 2D-V212 unit cooler, and associated fans (2D1V212 and 2D2V212), are not part of the safety-related portion of the drywell air cooling system.

References:

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