

SECY-00-045  
RIS 2000-17

November 10, 2006

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, 2005 to June 30, 2006. 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.

There are no commitments contained in this letter.

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

Sincerely,

Original signed by Chris Mudrick for

Ron J. DeGregorio  
Vice President – Limerick  
Exelon Generation Company, LLC

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, 2005 and June 30, 2006 and require NRC notification.

Commitment change tracking number:	2005-006
CT number:	T04087
Commitment source document:	LER 2-97-010
Change:	Deleted

Subject:

Limerick failed to examine a Unit 2 reactor flux wire specimen to determine reactor pressure vessel fluence in accordance with TS Surveillance Requirement 4.4.6.1.4.

Statement of commitment:

The appropriate ST procedures will be revised prior to the next scheduled specimen withdrawal in accordance with TS Table 4.4.6.1.3-1 for each unit to ensure satisfactory completion of the analysis in accordance with TS SR 4.4.6.1.3.

Change to commitment:

The above commitment is being deleted.

Justification for change:

Analysis of the irradiation embrittlement affects on the Limerick reactor vessel beltline materials properties are now based on material test results obtained per Boiling Water Reactor Vessel and Internals Project (BWRVIP-86), Integrated Surveillance Program (ISP). Limerick specific approval to participate in the BWRVIP ISP was given by Unit 1 Tech Spec Amendment 167 and Unit 2 Tech Spec Amendment 130. These license amendments deleted TS surveillance requirements (SR) 4.4.6.1.3 and 4.4.6.1.4, and Table 4.4.6.1.3-1. These SRs were used to schedule the removal and analysis of material surveillance specimens from the Limerick reactor vessels. The Limerick reactors are not selected as BWRVIP ISP "host" reactors and the removal, testing, and analysis of Limerick specific beltline materials is not required. This change deletes those procedure steps requiring action based on previous SRs 4.4.6.1.3 and 4.4.6.1.4, at a time that was specified in TS Table 4.4.6.1.3-1.

Commitment change tracking number: 2006-002  
CT number: T03365  
Commitment source document: PECO response to NRC Generic Letter 94-02, 9/9/94  
Change: Deleted

Subject:

NRC Generic Letter 94-02, Long Term Solutions and Upgrade of Interim Operating Recommendations For Thermal Hydraulic Instabilities in Boiling Water Reactors

Statement of commitment:

Response 1a:

PECO Energy, at both LGS and PBAPS, has implemented the Interim Corrective Actions (ICA) specified in NRC Bulletin 88-07, Supplement 1, "Power Oscillations in Boiling Water Reactors." These actions included a review of station procedures that ensured requirements existed to initiate a manual scram under the conditions described in Requested Action 1a, and a review of training material that ensured that operators were made aware of potential power oscillations and the potential to exceed core thermal safety limits under the conditions described in Requested Action 1a.

Response 1b:

PECO Energy is currently reviewing the ICA developed by the BWROG and will complete implementation at both LGS and PBAPS by January 31, 1995. To simplify plant operations and provide additional conservatism to the ICA, the Controlled Entry Region III, proposed in the June 6, 1994 BWROG guidelines, will be treated as part of the Exit Region II. When Power Distribution Controls (PDC), consistent with Appendix B of the June 6, 1994 BWROG guidelines are implemented, the Exit Region II may be amended to include a Controlled Entry region.

PECO Energy will ensure that the NRC receives written notification in accordance with the conditions of GL 94-02, should any changes to the ICA changes be implemented.

Change to commitment:

The above commitment is being deleted.

Justification for change:

Activation of the OPRM (Oscillation Power Range Monitor) removes commitments to the Interim Corrective Actions as approved by the NRC. This includes the requirement to scram on a loss of forced circulation. The NRC approved activation of the OPRM via approval of Limerick Technical Specification Amendment 177 for Unit 1 and Technical Specification Amendment 139 for Unit 2.