May 29, 2008

Mr. Charles G. Pardee
Chief Nuclear Officer and Senior Vice President
Exelon Generation Company, LLC
200 Exelon Way
Kennett Square, PA 19348

SUBJECT: LIMERICK GENERATING STATION, UNIT NOS. 1 AND 2 - REQUEST FOR ADDITIONAL INFORMATION REGARDING PROPOSED ADMINISTRATIVE TECHNICAL SPECIFICATIONS CHANGES (TAC NOS. MD7508 AND MD7509)

Dear Mr. Pardee:

By letter dated December 12, 2007 (Agencywide Documents Access and Management System Accession No. ML073461114), Exelon Generation Company, LLC, submitted a license amendment request regarding various administrative changes to the Limerick Generating Station, Units 1 and 2, technical specifications.

The U.S. Nuclear Regulatory Commission has determined that a response to the enclosed Request for Additional Information (RAI) is necessary in order for the staff to complete its review. The questions in the enclosure were sent to Mr. Glenn Stewart of your staff via electronic transmission in draft form on April 25, 2008. The draft RAI was sent to ensure that the questions were understandable, the regulatory basis was clear and to determine if the information was previously docketed. These questions were discussed with your staff in a teleconference on April 29, 2008, and it was agreed that you would provide responses within 30 days of the date of this letter.

Please contact me at 301-415-2833 if you have any questions.

Sincerely,

***/ra/***

Peter J. Bamford, Project Manager
Plant Licensing Branch I-2
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-352 and 50-353

Enclosure: As stated

cc w/encl: See next page

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Limerick Generating Station, Unit Nos. 1 and 2
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The U.S. Nuclear Regulatory Commission has determined that a response to the enclosed Request for Additional Information (RAI) is necessary in order for the staff to complete its review. The questions in the enclosure were sent to Mr. Glenn Stewart of your staff via electronic transmission in draft form on April 25, 2008. The draft RAI was sent to ensure that the questions were understandable, the regulatory basis was clear and to determine if the information was previously docketed. These questions were discussed with your staff in a teleconference on April 29, 2008, and it was agreed that you would provide responses within 30 days of the date of this letter.

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Peter J. Bamford, Project Manager
Plant Licensing Branch I-2
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Office of Nuclear Reactor Regulation

Docket Nos. 50-352 and 50-353

Enclosure: As stated

cc w/encl: See next page

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REQUEST FOR ADDITIONAL INFORMATION

REGARDING PROPOSED ADMINISTRATIVE CHANGES TO THE

TECHNICAL SPECIFICATIONS

LIMERICK GENERATING STATION, UNIT NOS. 1 AND 2

DOCKET NOS. 50-352 AND 50-353

By letter dated December 12, 2007 (Agencywide Documents Access and Management System Accession No. ML073461114), Exelon Generation Company, LLC, submitted a license amendment request (LAR) regarding various administrative changes to the technical specifications (TSs) for Limerick Generating Station (LGS), Units 1 and 2.

The Nuclear Regulatory Commission (NRC) staff has been reviewing the submittal and has determined that additional information is needed to complete its review.

Section 4.0, "Technical Analysis," of the LAR describes changes to several TS pages where relocation references are proposed to be changed from the Updated Final Safety Analysis Report (UFSAR) to the Technical Requirements Manual (TRM). Item 4 in LAR Section 4.0 states that the LGS TRM is incorporated into the LGS UFSAR "by reference." The LGS UFSAR, Section 1.6, titled "Material Incorporated by Reference/General Reference," does not list the TRM as a document incorporated by reference. Furthermore, the discussion of the TRM in UFSAR, Section 13.5.3, "Operations Technical Requirements Manual (TRM)," does not state that the TRM is "incorporated by reference." Nuclear Energy Institute (NEI) 98-03, "Guidelines for Updating Final Safety Analysis Reports," Revision 1, dated June 1999, provides instructions on the proper way to incorporate material by reference into the UFSAR. U.S. NRC Regulatory Guide (RG) 1.181, Revision 0, dated September 1999, titled "Content of the Updated Final Safety Analysis Report in Accordance with [Title 10 of the *Code of Federal Regulations*] 10 CFR 50.71(e)," endorses NEI 98-03, Revision 1. RG 1.181, Revision 0, is in turn endorsed by the LGS UFSAR in Section 1.8.

NEI 98-03 discusses the relationship of the TRM to the UFSAR and describes two options for TRM control. Under option one of NEI 98-03, the TRM is "incorporated by reference" into the UFSAR. With option two, the TRM is treated in a manner consistent with procedures fully or partially described in the UFSAR. Option one requires an explicit UFSAR statement of "incorporation by reference." It also requires the TRM to be subject to the update/reporting requirements of 10 CFR 50.71(e). With option two, the important consideration is the treatment of the TRM such that its contents are considered as UFSAR-level information when evaluating changes under 10 CFR 50.59. LGS UFSAR 13.5.3 refers to control of the TRM under 10 CFR 50.59, but does not clearly specify that information contained in the TRM is UFSAR-level material.

Based on this discussion please answer the following:

1.) Is it your intent to consider the TRM "incorporated by reference" into the UFSAR in accordance with the process described in NEI 98-03, or do you plan to control the TRM in accordance with option two described above? If you plan to use option two, will you treat

Enclosure

the TRM consistent with procedures fully or partially described in the UFSAR? Also, if option two is desired, do you plan to update your UFSAR Section 13.5.3 to clearly specify the treatment of TRM material as "described in the final safety analysis report, as updated" under 10 CFR 50.59?

Additionally, the following administrative issue is provided for your consideration.

2.) LGS Un it 1 TS page 3/4 1-12 proposes to delete paragraph 4.1.3.6(d), but does not propose to move the "and" from 4.1.3.6(c) to 4.1.3.6(b). Please consider submitting a corrected TS page to address this grammatical issue.