

June 11, 2008

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, D.C. 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: Response to Request for Additional Information  
Proposed Administrative Changes to Technical Specifications

References:

1. Letter from Pamela B. Cowan, Exelon Generation Company, LLC, to U.S. Nuclear Regulatory Commission, "License Amendment Request, Proposed Administrative Changes to Technical Specifications," dated December 12, 2007.
2. Letter from Peter J. Bamford, U.S. Nuclear Regulatory Commission, to Charles. G. Pardee, Exelon Generation Company, LLC, "Limerick Generating Station, Units 1 and 2 - Request for Additional Information Regarding Proposed Administrative Technical Specifications Changes (TAC Nos. MD7508 and MD7509)," dated May 29, 2008.

In Reference 1, Exelon Generation Company, LLC (Exelon) submitted a license amendment request (LAR) regarding various administrative changes to the Technical Specifications (TS), Appendix A of Facility Operating License Nos. NPF-39 and NPF-85 for Limerick Generating Station (LGS), Units 1 and 2, respectively.

In Reference 2, the NRC requested additional information in order to complete its review of the LAR. Attachment 1 to this letter provides a restatement of the questions along with Exelon's response. Attachment 2 provides a revised markup of LGS, Unit 1, TS page 3/4 1-12. All other TS markup pages provided in the Reference 1 submittal remain unchanged.

Response to Request for Additional Information  
License Amendment Request  
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Exelon has determined that the information provided in response to the request for additional information does not impact the conclusions of the no significant hazards consideration as stated in Reference 1.

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 11th day of June, 2008.

Respectfully,



Pamela B. Cowan  
Director, Licensing and Regulatory Affairs  
Exelon Generation Company, LLC

gsw

Attachments: 1. Response to Request for Additional Information  
2. Revised Markup of Proposed Technical Specifications Page

cc:	Regional Administrator - NRC Region I	w/ attachments
	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 1**

**RESPONSE TO 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**

In Reference 1, Exelon Generation Company, LLC (Exelon) submitted a license amendment request (LAR) regarding various administrative changes to the Technical Specifications (TS), Appendix A of Facility Operating License Nos. NPF-39 and NPF-85 for Limerick Generating Station (LGS), Units 1 and 2, respectively.

In Reference 2, the NRC requested additional information in order to complete its review of the LAR. The questions are restated below along with Exelon's response.

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, 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 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?

**Response**

Exelon acknowledges that the LGS TRM is not explicitly "incorporated by reference" in the LGS UFSAR in accordance with the guidance provided in NEI 98-03, Revision 1. LGS UFSAR Section 13.5.3 provides a general reference to the TRM by providing a description of the TRM, its contents, its purpose, and the controls under which changes to the TRM are evaluated, reviewed, and approved. UFSAR Section 13.5.3 specifically states that individual sections of the TRM contain relocated licensing commitments which are subject to the provisions of 10 CFR 50.59, and are controlled in accordance with the applicable established procedure process. Since its inception in the mid-1990's, the LGS TRM, in accordance with the guidance provided in NEI 98-03, Revision 1, as endorsed by NRC RG 1.181, has been treated and controlled as a procedure described in the UFSAR, and any changes to the TRM have been evaluated under the requirements of 10 CFR 50.59.

Coincident with the issuance of this request for additional information, Amendment Nos. 191 and 152 for LGS, Units 1 and 2, respectively, were issued by letter dated May 29, 2008 (Reference 3). These amendments involved deleting the operability and surveillance requirements for the drywell air temperature and suppression chamber air temperature post-accident monitoring instrumentation from TS and relocating the requirements to the LGS TRM. To ensure that the information contained within the TRM is treated at the same level as information contained within the UFSAR for 10 CFR 50.59 purposes, these amendments required updating the LGS UFSAR to include, but not limited to, a statement that the TRM is treated in a manner consistent with procedures fully or partially described in the UFSAR. For the purposes of 10 CFR 50.59, information presented in the TRM is considered to be information described in the UFSAR, and therefore, is to be treated at the same level as information presented in the UFSAR. Therefore, LGS UFSAR Section 13.5.3 will be updated as part of the implementation of these amendments as required by Reference 3.

- 2.) LGS Unit 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.

**Response**

A corrected LGS, Unit 1, TS page 3/4 1-12 is provided in Attachment 2. All other TS markup pages provided in the Reference 1 submittal remain unchanged.

## References

1. Letter from Pamela B. Cowan, Exelon Generation Company, LLC, to U.S. Nuclear Regulatory Commission, "License Amendment Request, Proposed Administrative Changes to Technical Specifications," dated December 12, 2007.
2. Letter from Peter J. Bamford, U.S. Nuclear Regulatory Commission, to Charles G. Pardee, Exelon Generation Company, LLC, "Limerick Generating Station, Units 1 and 2 - Request for Additional Information Regarding Proposed Administrative Technical Specifications Changes (TAC Nos. MD7508 and MD7509)," dated May 29, 2008.
3. Letter from Peter Bamford, U.S. Nuclear Regulatory Commission, to Charles. G. Pardee, Exelon Generating Company, LLC, "Limerick Generating Station, Units 1 and 2 - Issuance of Amendments RE: Changes to Accident Monitoring Instrumentation Technical Specifications (TAC Nos. MD5937 and MD5938), " dated May 29, 2008.

**ATTACHMENT 2**

**Limerick Generating Station, Units 1 and 2  
Docket Nos. 50-352 and 50-353**

**Response to Request for Additional Information**

**License Amendment Request - Proposed  
Administrative Changes To Technical Specifications**

**Revised Markup of Proposed Technical Specifications Page**

**Unit 1 TS Page**

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## REACTIVITY CONTROL SYSTEMS

### SURVEILLANCE REQUIREMENTS

4.1.3.6 Each affected control rod shall be demonstrated to be coupled to its drive mechanism by observing any indicated response of the nuclear instrumentation while withdrawing the control rod to the fully withdrawn position and then verifying that the control rod drive does not go to the overtravel position:

- a. Prior to reactor criticality after completing CORE ALTERATIONS that could have affected the control rod drive coupling integrity,
- b. Anytime the control rod is withdrawn to the "Full out" position in subsequent operation, *and insert*
- c. Following maintenance on or modification to the control rod or control rod drive system which could have affected the control rod drive coupling integrity, *and delete*

d. When repositioning the uncoupled control rod per Specification 3.1.3.6.d the uncoupled rod's position shall be verified to have followed the control rod drive by neutron instrumentation (LPRM or TIP). If the control blade can not be verified to have followed the drive out to its final position, then the rod shall be completely inserted and the control rod directional valves disarmed as stated in 3.1.3.6.a.2.

↳ delete