

June 20, 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 LOCAL POWER
RANGE MONITOR CALIBRATION FREQUENCY REVISION (TAC NOS.
MD7048 AND MD7049)

Dear Mr. Pardee:

By letter dated October 19, 2007 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML072970339), Exelon Generation Company, LLC, submitted a license amendment request (LAR) regarding an extension of the local power range monitor calibration interval specified in the technical specifications for Limerick Generating Station, Units 1 and 2. The original LAR was supplemented by letters dated March 14, 2008 (ADAMS Accession No. ML080850565) and March 26, 2008 (ADAMS Accession No. ML080990667).

The U.S. Nuclear Regulatory Commission staff has been reviewing your LAR, and 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. Richard Gropp of your staff via electronic transmission in draft form on June 3, 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 June 9, 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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cc:

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Limerick Generating Station, Unit Nos. 1 and 2
cc:

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Associate General Counsel

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SUBJECT: LIMERICK GENERATING STATION, UNIT NOS. 1 AND 2 - REQUEST FOR
ADDITIONAL INFORMATION REGARDING PROPOSED LOCAL POWER
RANGE MONITOR CALIBRATION FREQUENCY REVISION (TAC NOS.
MD7048 AND MD7049)

Dear Mr. Pardee:

By letter dated October 19, 2007 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML072970339), Exelon Generation Company, LLC, submitted a license amendment request (LAR) regarding an extension of the local power range monitor calibration interval specified in the technical specifications for Limerick Generating Station, Units 1 and 2. The original LAR was supplemented by letters dated March 14, 2008 (ADAMS Accession No. ML080850565) and March 26, 2008 (ADAMS Accession No. ML080990667).

The U.S. Nuclear Regulatory Commission staff has been reviewing your LAR, and 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. Richard Gropp of your staff via electronic transmission in draft form on June 3, 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 June 9, 2008, and it was agreed that you would provide responses within 30 days of the date of this letter.

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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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REQUEST FOR ADDITIONAL INFORMATION
REGARDING PROPOSED CHANGES TO THE TECHNICAL SPECIFICATIONS
LOCAL POWER RANGE MONITOR CALIBRATION FREQUENCY
LIMERICK GENERATING STATION, UNIT NOS. 1 AND 2
DOCKET NOS. 50-352 AND 50-353

By letter dated October 19, 2007 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML072970339), Exelon Generation Company, LLC, submitted a license amendment request (LAR) regarding an extension of the local power range monitor (LPRM) calibration interval specified in the technical specifications for Limerick Generating Station, Units 1 and 2. The original LAR was supplemented by letters dated March 14, 2008 (ADAMS Accession No. ML080850565) and March 26, 2008 (ADAMS Accession No. ML080990667).

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

- 1.) In Enclosure 1 of the March 14, 2008, supplement, it is stated that 2,000 effective full-power hours (EFPH) is equivalent to ~ (approximately) 2,000 Megawatt Days per short ton (MWD/st). Provide a demonstration that 2,000 EFPH is conservative or equivalent to 2,000 MWD/st or provide a proposed surveillance interval that is bounding with respect to the analysis.
- *2.) In the March 14, 2008, supplement, it is stated that, "Reference 9 also shows [emphasis added] that this has an [[]] on the calculated SLMCPR [Safety Limit Minimum Critical Power Ratio] value." Reference 9 was provided by the March 26, 2008, supplement, in which it is stated, "For the Limerick plants, comparison between SLMCPR calculations using the original LPRM [local power range monitor] update uncertainty and the doubled LPRM update uncertainty shows an [[]] on the calculated SLMCPR." This is a statement or conclusion. Provide a demonstration or calculations with an explanation that shows this conclusion is valid.
- 3.) In the March 26, 2008, supplement, a demonstration was provided regarding doubling of the LPRM uncertainty on the SLMCPR. Is it your intent to apply this doubling to your SLMCPR calculations and reflect this methodology change in your licensing basis when operating with the longer surveillance interval? If so, how will the SLMCPR calculations and the licensing basis documentation be updated?

* Quotations in question (2), including the empty brackets, are taken from the non-proprietary versions of the supplements referenced.