

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 JET PUMP  
SURVEILLANCE CHANGES (TAC NOS. MD7386 AND MD7387)

Dear Mr. Pardee:

By letter dated November 13, 2007 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML073170701), Exelon Generation Company, LLC, submitted a license amendment request (LAR) regarding removal of footnotes requiring original plant startup data to be used as a baseline for evaluating the performance of the jet pumps during surveillances contained in the technical specifications for Limerick Generating Station, Units 1 and 2.

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. Glenn Stewart of your staff via electronic transmission in draft form on June 9, 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 11, 2008, and it was agreed that you would provide responses within 45 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 w/encl: See next page

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REQUEST FOR ADDITIONAL INFORMATION  
REGARDING PROPOSED CHANGES TO THE TECHNICAL SPECIFICATIONS  
SURVEILLANCE REQUIREMENT 4.4.1.2 – JET PUMPS  
LIMERICK GENERATING STATION, UNIT NOS. 1 AND 2  
DOCKET NOS. 50-352 AND 50-353

By letter dated November 13, 2007 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML073170701), Exelon Generation Company, LLC, submitted a license amendment request (LAR) regarding a change to technical specification (TS) surveillance requirement 4.4.1.2 – Jet Pumps. Specifically the LAR requests to delete footnotes that require jet pump performance to be compared to original plant startup data.

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

- 1.) The LAR, Section 4.0, states, “A determination will be made whether or not to change the existing criteria.” On what basis will the determination to re-baseline be made? If there is an approved topical report that will be utilized, please identify the document. If the criteria used to make a re-baseline determination is specific to Limerick Generating Station (LGS), please provide a summary of the methodology.
- 2.) In order to ensure that a re-baseline appropriately reflects the changes in core hydraulics due to refueling activities or configuration changes as described in the LAR, are inspections of the jet pump assemblies performed prior to a planned re-baseline? If they are planned, please provide a summary of these inspection activities. If not, provide a justification as to why they would not be required.
- 3.) How will the re-baseline criteria/inspection plans be controlled?
- 4.) The existing wording in the LGS TSs is unusual as compared to other similar Boiling Water Reactors (BWRs). Is there anything specific to the LGS design or operation that would differentiate it from other similar BWRs with respect to the baseline for jet pump surveillance acceptance criteria?