

SECY-00-045  
RIS 2000-17

December 5, 2008

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, 2007 to June 30, 2008. 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

Christopher H. Mudrick  
Vice President – Limerick  
Exelon Generation Company, LLC

cc: S. J. Collins, Administrator Region I, USNRC  
E. M. DiPaolo, USNRC Senior Resident Inspector, LGS

LS-AA-110 Commitment Management, Section 4.7, "NRC Notification of Commitment Changes/Deletions", 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, 2007 and June 30, 2008 and require NRC notification.

|                                    |                          |
|------------------------------------|--------------------------|
| Commitment change tracking number: | 2007-044                 |
| CT number:                         | T00713                   |
| Commitment source document:        | Reply to NOV 90-13/90-12 |
| Change:                            | Deleted                  |
| Requestor:                         | Dave Horne               |

Subject:

Construction Building controlled procedures were found to not be maintained per A-2 in that there were obsolete procedure revisions, missing procedures, misfiled procedures and a missing volume of procedures.

Statement of commitment:

General Employee Training (GET) will be revised to include a segment, which emphasizes the responsibilities of all LGS personnel for proper use and handling of controlled procedures.

Change to commitment:

Deleted

Justification for change:

Procedural adherence and human performance tools are embedded in General Employee Training. The implementing documents do not exist, as they have been superseded by fleet-wide lesson plans and INPO sponsored NANTEL computer based training. Exelon procedures ensure continued compliance.

Commitment change tracking number: 2007-055  
CT numbers: T01992  
Commitment source documents: NRC IR 92-80  
Change: Deleted  
Requestor: Jim Mitman

Subject:

Generic Letter 89-10 "Safety Related MOVs" Inspection Report 92-80

Statement of commitment:

Revise PMQ-600-022 to provide the frequency interval for GL 89-10 valves.

Change to commitment:

Deleted

Justification for change:

The MOV program commitments are covered by procedures ER-AA-300, ER-AA-302, and ER-AA-302 series T&RMs.

Commitment change tracking number: 2008-007  
CT number: T04090  
Commitment source document: NRC SER dated 6-28-94  
Change: Deleted  
Requestor: Mark Gift

Subject:

SER for TS amendment 71/34 for 24 month refueling cycle

Statement of commitment:

1. The Licensee established a program for monitoring and assessing the effects of increased calibration interval on instrument drift.
2. The calibration interval for Suppression Pool Water Level instrumentation will be maintained at 18-months.
3. The Refuel Floor HVAC Exhaust Radiation recorders need to be replaced.
4. 3 milliseconds will be added to the overall response time of the reactor scram and EOC-RPT to account for the impact of drift.

Change to commitment:

Deleted

Justification for change:

1. IR 546923 documented that the drift analysis is not required. Calibration failures are evaluated against the surveillance allowances by the Corrective Action Program.
2. Tech Specs have been revised to require the Suppression Pool Water Level instrumentation (T4.3.3.1-Item 3.D) be calibrated every 18 months (Frequency E – every 18 months).  
(Note: Now controlled by surveillance frequency control program.)
3. All of the Refuel Floor HVAC Exhaust Radiation recorders have been replaced.
4. A1071264-07 documented no increased response time following the first 24 month interval. The 3 milliseconds margin will not be added to the overall response time.  
Note: A subsequent change in test method to eliminate double counting has significantly increased the EOC-RPT response time margin to the Technical Specification limit, which also eliminated the need to add 3 milliseconds.