



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

June 10, 2009

Mr. Charles G. Pardee  
President and Chief Nuclear Officer  
Exelon Nuclear  
4300 Winfield Road  
Warrenville, IL 60555

SUBJECT: LIMERICK GENERATING STATION, UNITS 1 AND 2 - REQUEST FOR  
ADDITIONAL INFORMATION REGARDING RELIEF REQUESTS ASSOCIATED  
WITH THE THIRD INSERVICE TESTING INTERVAL (TAC NOS. ME0742  
THROUGH ME0751)

Dear Mr. Pardee:

By letter dated February 18, 2009 (Agencywide Documents Access and Management System Accession No. ML090500720), Exelon Generation Company, LLC, submitted a set of relief requests associated with the third 10-year inservice testing interval at Limerick Generating Station, Units 1 and 2.

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. Thomas Loomis of your staff via electronic transmission, in draft form, on May 26, 2009. 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 4, 2009, and it was agreed that you would provide responses by July 17, 2009.

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

Sincerely,

A handwritten signature in cursive script that reads "Peter Bamford".

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

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REQUEST FOR ADDITIONAL INFORMATION  
REGARDING RELIEF REQUESTS ASSOCIATED WITH THE  
THIRD INSERVICE TESTING INTERVAL  
LIMERICK GENERATING STATION, UNITS 1 AND 2  
DOCKET NOS. 50-352 AND 50-353

By letter dated February 18, 2009 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML090500720), Exelon Generation Company, LLC, submitted a set of relief requests associated with the third Inservice Testing (IST) interval for Limerick Generating Station (LGS), Units 1 and 2. The applicable code for the third interval IST program is the American Society of Mechanical Engineers (ASME) [Operation and Maintenance] OM Code, 2004 edition.

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

Request for Relief 11-PRR-1 Rev. 1:

1. A replacement for Code Case OMN-9, Code Case OMN-16, is included in the OMB-2006 addenda, with applicability specified that includes the proposed third IST interval code of record, (ASME OM Code, 2004 edition). This code case has been approved for use by the OM Committee with a new expiration date of June 1, 2009, and provides more up-to-date references and requirements. Please explain why Code Case OMN-9 was requested to be used instead of Code Case OMN-16, or provide a revised request that references Code Case OMN-16.

Request for Relief GVRR-5 Rev. 3:

1. Please discuss why the requirements of ISTC 5221(c) can not be implemented and why relief is not required from the requirements of ISTC 5221(c).
2. Please discuss why the requirements of ISTC 5222 can not be utilized for testing of the identified check valves.

Request for Relief 47-VRR-2 Rev. 0:

1. Please provide a discussion of why relief is required from the identified ASME OM Code requirements for each component identified.
2. The relief request states that reverse flow verification of 47-1(2)-38 is demonstrated by normal control rod motion. Please clarify how scram insertion time testing demonstrates the valve close function required by the ASME OM Code.

Enclosure

3. The relief request states that testing is performed with reactor coolant system pressure greater than or equal to 950 [pounds per square inch gauge] psig. Please address how the requirements of ISTC 3100 and ISTC 3310 will be met.

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*/ra/*

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Plant Licensing Branch I-2  
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