

SECY-00-045
RIS 2000-17

December 4, 2009

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, 2008 to June 30, 2009. 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 new regulatory 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

Attachment: List of changes to NRC commitments

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

Attachment - List of changes to NRC commitments

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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, 2008 and June 30, 2009 and require NRC notification.

Commitment change tracking number:	2008-060
CT number:	T04622
Commitment source document:	Letter to NRC dated 5/16/07
Change:	Revision
Requestor:	Craig Markle

Subject:

NRC Order EA-06-137 Key Mitigating Strategies.

Statement of commitment:

Key radiological protection mitigation strategies applicable to each license (described in attachment 2 of letter to NRC dated 5/16/07) have been incorporated into site procedures, and initial and recurring operations staff training programs, as required by Order EA-06-137.

Change to commitment:

Commitment was revised to allow larger hose sizes than specified in the response.

Justification for change:

Three inch hoses rather than 2.5 inch hoses will be used to support one standard size hose for all scenarios. Three inch hoses have been evaluated as a suitable option.

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Commitment change tracking number: 2008-061
CT numbers: T04046
Commitment source documents: Letter to NRC dated 5/14/93
Change: Deleted
Requestor: Linda Parlatore

Subject:

Failure to perform airborne radiological survey during TIP tubing maintenance.

Statement of commitment:

Guidelines will be developed for radiologically significant work which will require an evaluation of the magnitude of the potential hazard to ensure the appropriateness of the radiological controls. The assumptions used in these evaluations will be clearly stated in order that the technicians performing job coverage can evaluate the actual radiological conditions against the expected radiological conditions.

Improvements will be made to the Health Physics Job History Files to incorporate lessons learned from the industry.

Change to commitment:

Deleted

Justification for change:

These commitments were made as a result of a notice of violation from the NRC for not performing the necessary surveys for airborne activities and adequately informing the workers of the radiological conditions. The violation was assigned because RP did not follow the requirements of 10CFR19.12 Instruction to Workers and 10CFR20 Subpart F, Surveys and Monitoring.

The commitment made by LGS management to incorporate special surveys into various procedures is an enhancement to ensure the above requirements are met. No further commitments beyond the requirements of 10CFR19 and 20 were made as a response to this violation.

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Commitment change tracking number: 2008-063
CT number: T01798
Commitment source document: NRC Inspection Report 91-19/20
Change: Deleted
Requestor: Linda Parlatore

Subject:

Failure to attach lifting slings to radioactive waste liner and documentation of continuous air monitor (CAM) setpoint changes.

Statement of commitment:

RW-222 was revised to add a step which states, “ensure appropriate rigging is attached to the container with no physical impairments”.

RW-222 Attachment 8.4 was changed to include a signoff which reads “Appropriate rigging is attached to the container, with no physical impairments, nor obstructions for loading”.

HP-212 section 6.1.2 was revised to require individuals who change CAM set-points to log the change on attachment 8.2, and to notify the HP supervisor to update the CAM logbook in the HP field office.

HP-212 attachment 8.2 has been revised to allow multiple setpoint changes on each sheet. Individuals changing setpoints initial the form and document the initials of the HP supervisor who was made aware of the change.

Change to commitment:

Deleted

Justification for change:

This commitment addresses several issues:

- 1) Lack of lifting devices, cited in the NRC Notice of Violation. The violation sites the inconsistency with Condition 64 of the State of South Carolina, License Number 097, issued to Chem-Nuclear Systems, Inc. for the operation of the Barnwell Disposal Site. The Barnwell shipping requirement states that radioactive material shipments shall not be received unless appropriate lifting devices have been attached to the container. 10CFR shipping requirements were met and a commitment was initiated to ensure lifting devices are procedurally incorporated for Barnwell, which is no longer in operation.

2) Procedure compliance with regards to management of CAM set point changes. This commitment was based on NRC inspector observations and concerns. This is a procedure enhancement to clarify expectations when changing instrument set points. This enhancement relates directly to the operation of the PING-1A Radiation Monitoring System which is no longer used at Limerick.

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Commitment change tracking number: 2009-001
CT number: T03884 & T03957
Commitment source document: NOV response for NRC Inspection Report 96-03
Change: Deleted
Requestor: Cindy Heimbach

Subject:

Process for the control of safeguard information per 10CFR73.21.

Statement of commitment:

Procedures for handling and distributing SGI will be standardized by March 1997.

Change to commitment:

Deleted

Justification for change:

The original commitment was for having a simplified process for creating, handling, transferring and distributing SGI and was linked to the corporate commitment T03957. The commitment was met in 1997. In 2001 the Exelon common procedures were implemented with the SGI control procedure becoming SY-AA-101-106, Control and Classification of Safeguards Information. With the procedure being identified as an SY-AA this indicates it is a corporate common procedure to be implemented across the fleet.

It is not necessary to annotate the commitment in SY-AA-101-106 because it is no longer unique for Limerick and Peach Bottom as all Exelon sites follow the same procedure. In addition SY-AA-101-106 follows the criteria set forth in NUREG 0794, Protection of Unclassified Safeguards Information. The source document will be added as a reference in SY-AA-101-106. The current procedural guidance exceeds the specific criteria identified in the original commitment.

With the commitment requiring completion in 1997, the commitment has been met and no longer is required. In addition the procedure being a corporate common procedure indicates that a standard process is maintained for fleet use.

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Commitment change tracking number: 2009-002
CT number: T02662
Commitment source document: Letter to NRC dated 7/2/87
Change: Deleted
Requestor: Cindy Heimbach

Subject:

Control of Safeguards Information

Statement of commitment:

A Protection Technology, Inc. Safeguards Committee was formed to review documents generated by PTI for Safeguards determination. PTI security instruction SI-019 "Safeguards Information – Preparation, Distribution, and Control" was revised to describe the PTI Safeguards Committee.

All PTI Supervisors

Change to commitment:

Deleted

Justification for change:

The original commitment was for Protection Technology to form a committee for the purpose of determining if a document generated by the company could be safeguards. Protection Technology is no longer the Security company used at Exelon Nuclear Security. The responsibility for classifying a document as safeguards falls on the Director, Nuclear Security or the Manager, Site Security in accordance with SY-AA-101-106.

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Commitment change tracking number: NA
CT number: T04645
Commitment source document: SFAQ 04-09
Change: Deleted
Requestor: Cindy Heimbach/Rich Gropp

Subject:

Vehicle barrier systems

Statement of commitment:

The station will follow SFAQ 04-09 guidance.

Change to commitment:

Deleted

Justification for change:

The original commitment was for following SFAQ 04-09. Since the issuance of SFAQ 04-09 NEI has revised the Security Plan template to include the SFAQ 04-09 requirements. All site Security Plans are of the current NEI 03-12 revisions with the SFAQ 04-09 information. The Security Plan is an NRC commitment document.

NEI 03-12 was issued in 2004 during the Design Basis Threat order as an NRC approved Security Plan template. The NRC officially endorsed the use of NEI 03-12 by the licensees as their Security Plan. SFAQ 04-09 was incorporated into revision 4 of NEI 03-12. SFAQ 04-09 should no longer be considered a commitment since we are expected to implement the material identified in NEI 03-12 to ensure effective implementation of NRC requirements.

With the SFAQ 04-09 information in the Security Plan we have an obligation to satisfy the NRC requirements and the additional tracking is not required as it is a redundant commitment.