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

February 24, 2010

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 - ISSUANCE OF AMENDMENTS RE: REMOVAL OF TECHNICAL SPECIFICATION CONCERNING STRUCTURAL INTEGRITY REQUIREMENTS (TAC NOS. ME0740 AND ME0741)

Dear Mr. Pardee:

The Commission has issued the enclosed Amendment No.199 to Facility Operating License No. NPF-39 and Amendment No.160 to Facility Operating License No. NPF-85, for Limerick Generating Station (LGS), Units 1 and 2. These amendments consist of changes to the Technical Specifications (TSs) in response to your application dated February 25, 2009 (Agencywide Documents Access and Management System Accession No. ML090570378).

The amendments consist of the removal of structural integrity requirements contained in TS 3/4.4.8 for American Society of Mechanical Engineers (ASME) Code Class 1, 2 and 3 components. Requirements for ASME Code Class 1, 2 and 3 components at LGS continues to be specified in Title 10 of the *Code of Federal Regulations,* Section 50.55a, "Codes and Standards."

A copy of the Safety Evaluation is also enclosed. The Notice of Issuance will be included in the Commission's biweekly *Federal Register* notice.

Sincerely,

Peter Bamford

Peter 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

Enclosures:
1. Amendment No.199to License No. NPF-39
2. Amendment No.160to License No. NPF-85
3. Safety Evaluation

cc: Distribution via Listserv

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

EXELON GENERATION COMPANY, LLC

DOCKET NO. 50-352

LIMERICK GENERATING STATION, UNIT 1

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 199
License No. NPF-39

1. The Nuclear Regulatory Commission (the Commission) has found that:

   A. The application for amendment by Exelon Generation Company, LLC (the licensee), dated February 25, 2009, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;

   B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;

   C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;

   D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and

   E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.(2) of Facility Operating License No. NPF-39 is hereby amended to read as follows:

(2) Technical Specifications

The Technical Specifications contained in Appendix A and the Environmental Protection Plan contained in Appendix B, as revised through Amendment No.199 , are hereby incorporated into this license. Exelon Generation Company shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. This license amendment is effective as of its date of issuance and shall be implemented within 180 days of the date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

Harold K. Chernoff, Chief
Plant Licensing Branch I-2
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical Specifications and Facility Operating License

Date of Issuance: February 24, 2010

ATTACHMENT TO LICENSE AMENDMENT NO. 199

FACILITY OPERATING LICENSE NO. NPF-39

DOCKET NO. 50-352

Replace the following page of the Facility Operating License with the revised page. The revised page is identified by amendment number and contains marginal lines indicating the area of change.

Remove	Insert
Page 3	Page 3

Replace the following pages of the Appendix A Technical Specifications with the attached revised pages. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change.

Remove	Insert
xi	xi
3/4 4-24	3/4 4-24

(3) Pursuant to the Act and 10 CFR Parts 30, 40 and 70, to receive, possess and use at any time any byproduct, source and special nuclear material as sealed neutron sources for reactor startup, sealed sources for reactor instrumentation and radiation monitoring equipment calibration, and as fission detectors in amounts as required;

(4) Pursuant to the Act and 10 CFR Parts 30, 40, 70, to receive, possess, and use in amounts as required any byproduct, source or special nuclear material without restriction to chemical or physical form, for sample analysis or instrument calibration or associated with radioactive apparatus or components; and

(5) Pursuant to the Act and 10 CFR Parts 30, 40 and 70, to possess, but not separate, such byproduct and special nuclear materials as may be produced by the operation of the facility, and to receive and possess, but not separate, such source, byproduct, and special nuclear materials as contained in the fuel assemblies and fuel channels from the Shoreham Nuclear Power Station.

C. This license shall be deemed to contain and is subject to the conditions specified in the Commission's regulations set forth in 10 CFR Chapter I (except as exempted from compliance in Section 2.D. below) and is subject to all applicable provisions of the Act and to the rules, regulations, and orders of the Commission now or hereafter in effect; and is subject to the additional conditions specified or incorporated below:

(1) Maximum Power Level

Exelon Generation Company is authorized to operate the facility at reactor core power levels not in excess of 3458 megawatts thermal (100% rated power) in accordance with the conditions specified herein and in Attachment 1 to this license. The items identified in Attachment 1 to this license shall be completed as specified. Attachment 1 is hereby incorporated into this license.

(2) Technical Specifications

The Technical Specifications contained in Appendix A and the Environmental Protection Plan contained in Appendix B, as revised through Amendment No.199 , are hereby incorporated into this license. Exelon Generation Company shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

LIMITING CONDITIONS FOR OPERATION AND SURVEILLANCE REQUIREMENTS

3/4.4.8 (DELETED)

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

EXELON GENERATION COMPANY, LLC

DOCKET NO. 50-353

LIMERICK GENERATING STATION, UNIT 2

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 160
License No. NPF-85

1. The Nuclear Regulatory Commission (the Commission) has found that:

   A. The application for amendment by Exelon Generation Company, LLC (the licensee), February 25, 2009, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;

   B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;

   C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;

   D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and

   E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.(2) of Facility Operating License No. NPF-85 is hereby amended to read as follows:

(2) Technical Specifications

The Technical Specifications contained in Appendix A and the Environmental Protection Plan contained in Appendix B, as revised through Amendment No. 160, are hereby incorporated into this license. Exelon Generation Company shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. This license amendment is effective as of its date of issuance and shall be implemented within 180 days of the date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

Harold K. Chernoff, Chief
Plant Licensing Branch I-2
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical Specifications and Facility Operating License

Date of Issuance: February 24, 2010

ATTACHMENT TO LICENSE AMENDMENT NO. 160

FACILITY OPERATING LICENSE NO. NPF-85

DOCKET NO. 50-353

Replace the following page of the Facility Operating License with the revised page. The revised page is identified by amendment number and contains marginal lines indicating the area of change.

Remove	Insert
Page 3	Page 3

Replace the following pages of the Appendix A Technical Specifications with the attached revised pages. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change.

Remove	Insert
xi	xi
3/4 4-24	3/4 4-24

(4) Pursuant to the Act and 10 CFR Parts 30, 40, 70, to receive, possess, and use in amounts as required any byproduct, source or special nuclear material without restriction to chemical or physical form, for sample analysis or instrument calibration or associated with radioactive apparatus or components; and

(5) Pursuant to the Act and 10 CFR Parts 30, 40 and 70, to possess, but not separate, such byproduct and special nuclear materials as may be produced by the operation of the facility, and to receive and possess, but not separate, such source, byproduct, and special nuclear materials as contained in the fuel assemblies and fuel channels from the Shoreham Nuclear Power Station.

C. This license shall be deemed to contain and is subject to the conditions specified in the Commission's regulations set forth in 10 CFR Chapter I (except as exempted from compliance in Section 2.D. below) and is subject to all applicable provisions of the Act and to the rules, regulations, and orders of the Commission now or hereafter in effect; and is subject to the additional conditions specified or incorporated below:

(1) Maximum Power Level

Exelon Generation Company is authorized to operate the facility at reactor core power levels of 3458 megawatts thermal (100 percent rated power) in accordance with the conditions specified herein.

(2) Technical Specifications

The Technical Specifications contained in Appendix A and the Environmental Protection Plan contained in Appendix B, as revised through Amendment No. 160, are hereby incorporated into this license. Exelon Generation Company shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan. |

(3) Fire Protection (Section 9.5, SSER-2, -4)*

Exelon Generation Company shall implement and maintain in effect all provisions of the approved Fire Protection Program as described in the Updated Final Safety Analysis Report for the facility, and as approved in the NRC Safety Evaluation Report dated August 1983 through Supplement 9, dated August 1989, and Safety Evaluation dated November 20, 1995, subject to the following provision:

The licensee may make changes to the approved fire protection program without prior approval of the Commission only if those changes would not adversely affect the ability to achieve and maintain safe shutdown in the event of a fire.

*The parenthetical notation following the title of license conditions denotes the section of the Safety Evaluation Report and/or its supplements wherein the license condition is discussed.

INDEX

LIMITING CONDITIONS FOR OPERATION AND SURVEILLANCE REQUIREMENTS

3/4.4.8 (DELETED)

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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 199 TO FACILITY OPERATING LICENSE NO. NPF-39

AND AMENDMENT NO. 160 TO FACILITY OPERATING LICENSE NO. NPF-85

EXELON GENERATION COMPANY, LLC

LIMERICK GENERATING STATION, UNITS 1 AND 2

DOCKET NOS. 50-352 AND 50-353

1.0 INTRODUCTION

By letter dated February 25, 2009 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML090570378), Exelon Generation Company, LLC (Exelon, the licensee) requested changes to the Technical Specifications (TSs) for Limerick Generating Station (LGS), Units 1 and 2. The U.S. Nuclear Regulatory Commission (NRC or Commission) staff's original proposed no significant hazards consideration determination was published in the *Federal Register* on April 21, 2009 (74 FR 18254).

Specifically, the change requests the removal of the provisions contained in TS 3/4.4.8, which specifies requirements relating to the structural integrity of American Society of Mechanical Engineers (ASME) Code Class 1, 2 and 3 components. This specification is redundant to the requirements contained within Title 10 of the *Code of Federal Regulations* (10 CFR) Section 50.55a, "Codes and standards." With this proposed change, the pressure boundary structural integrity of ASME Code Class 1, 2 and 3 components will continue to be maintained by compliance with 10 CFR 50.55a, as implemented through the LGS, Units 1 and 2, Inservice Inspection (ISI) Program.

2.0 REGULATORY EVALUATION

Section 182a of the Atomic Energy Act, as amended (the Act), requires applicants for nuclear power plant operating licenses to incorporate TSs as part of the license. The Commission's regulatory requirements related to the content of the TSs are set forth in 10 CFR 50.36. That regulation requires that the TSs include items in several categories, including: (1) safety limits, limiting safety system settings, and limiting control settings (2) limiting conditions for operation (LCOs), (3) surveillance requirements (SRs), (4) design features, and (5) administrative controls.

On July 22, 1993, the Commission issued its Final Policy Statement (58 FR 39132), stating that satisfying the guidance in the policy statement also satisfies Section 182a of the Act and 10 CFR 50.36. The Final Policy Statement gave guidance for evaluating the required scope of the TSs and defined the guidance criteria to be used in determining which of the LCOs and associated SRs should remain in the TSs. The Commission noted that, in allowing certain items to be relocated to licensee-controlled documents while requiring that other items be retained in the

TSs, it was adopting the qualitative standard enunciated by the Atomic Safety and Licensing Appeal Board. There, the Appeal Board observed:

> [T]here is neither a statutory nor a regulatory requirement that every operational detail set forth in an applicant's safety analysis report (or equivalent) be subject to a technical specification, to be included in the license as an absolute condition of operation which is legally binding upon the licensee unless and until changed with specific Commission approval. Rather, as best we can discern it, the contemplation of both the Act and the regulations is that technical specifications are to be reserved for those matters as to which the imposition of rigid conditions or limitations upon reactor operation is deemed necessary to obviate the possibility of an abnormal situation or event giving rise to an immediate threat to the public health and safety.

The Commission codified four criteria in 10 CFR 50.36(c)(2)(ii) that fall within or satisfy any of the criteria in the Final Policy Statement. The four criteria are stated as follows:

(A) Criterion 1: Installed instrumentation that is used to detect, and indicate in a control room, a significant abnormal degradation of the reactor coolant pressure boundary;

(B) Criterion 2: A process variable, design feature, or operating restriction that is an initial condition of a design basis accident or transient analysis that either assumes the failure of or presents a challenge to the integrity of a fission product barrier;

(C) Criterion 3: A structure, system, or component that is part of the primary success path and which functions or actuates to mitigate a design basis accident or transient that either assumes the failure of, or represent a challenge to the integrity of a fission product barrier; and

(D) Criterion 4: A structure, system or component which operating experience or probabilistic risk assessment has shown to be significant to public health and safety.

As a result, existing LCO requirements that fall within or satisfy any of the criteria in 10 CFR 50.36(c)(2)(ii) must be retained in the TSs while those LCO requirements that do not fall within or satisfy any of these criteria may be relocated to other licensee-controlled documents.

3.0 TECHNICAL EVALUATION

3.1 Licensee's Proposed TS Changes

The licensee, in its application, stated that the purpose of TS 3/4.4.8, Reactor Coolant System (RCS) structural integrity LCO, is to specify the requirements of maintaining the structural integrity of the ASME Boiler and Pressure Vessel Code (Code) Class 1, 2, and 3 components. This specification was originally intended to support assurance that structural integrity and operational readiness of these components are maintained at an acceptable level throughout the life of the facility. The specification is applicable in all operational modes. However, the specification does not provide actions for a plant shutdown if its LCO is not met. In addition, as stated by the licensee, the specification contains no SRs. According to the licensee, this is because the specification addresses the passive pressure boundary function of ASME Code

Class 1, 2, and 3 components as established under the ISI program. In addition to the above, the licensee states that the ISI program is required pursuant to 10 CFR 50.55a, thereby addressing the inspections necessary to maintain structural integrity.

The licensee purports that the specification wording could be misconstrued to conflict with normal outage-related activities, including removal of RCS manways and the reactor vessel head in preparation for refueling, which would make the pressure boundary no longer structurally intact. The licensee states that maintaining a program-type requirement within an LCO creates significant interpretation issues for operations personnel. The RCS structural integrity TS was part of the original TS and the TS basis history regarding its intent is not documented. According to the licensee, TS 3/4.4.8 appears to have been included to help ensure that plant heatup and startup would not occur until all required portions of the RCS were verified to meet ISI acceptance criteria following inspections performed during a plant outage. Meeting these acceptance criteria helps ensure the integrity of the RCS pressure boundary during all modes of operation, including accident events. Furthermore, the licensee states that TS 3/4.4.8 contains no action suggesting it was designed to accommodate integrity concerns once plant heatup has commenced. According to the licensee, RCS structural integrity ISI activities are performed only during plant outages when conditions exist that permit access to the RCS pressure boundary and are not monitored or controlled through application of the ISI program during the operational cycles.

The licensee stated that other TSs are designed to monitor the structural integrity of the RCS during operation and provide actions to shut down the unit if compliance is not maintained. For example, RCS heatup and cooldown rates protect against applying undue stresses as a result of pressure/temperature transients on RCS components and piping. The RCS leakage TSs provide a means of evaluating the RCS structural integrity by detecting and monitoring leakage. Therefore, the licensee stated it is not necessary to apply a TS when integrity issues become evident during normal plant operation. According to the licensee, because TS 3/4.4.8 is redundant to other regulations, it is acceptable to remove TS 3/4.4.8 from the TSs. Finally, the licensee states that the removal of this specification does not reduce the controls that are necessary to ensure compliance with the ASME Code or the need to maintain the RCS pressure boundary. Structural integrity is maintained by compliance with 10 CFR 50.55a, as implemented through the LGS, Units 1 and 2, ISI Programs.

3.2 NRC Staff's Evaluation of TS Changes

The TS changes proposed by Exelon in this license amendment request are required to be evaluated to confirm compliance with the regulatory requirements in Section 2.0 of this safety evaluation and the basis for each finding is discussed in the following paragraphs.

For 10 CFR 50.36(c)(2)(ii), Criterion 1, the ASME Code Class 1, 2, and 3 components generally do not include any instrumentation used to detect and indicate in the control room, a significant abnormal degradation of the reactor coolant pressure boundary. Any such instrumentation is covered by existing TS 3/4.3 and/or TS 3/4.4.3. Therefore, the staff finds that the TS proposed for deletion does not meet Criterion 1.

For Criterion 2, structural integrity is neither a process variable, design feature, or operating restriction that is an initial condition of a design-basis analysis (DBA) or transient analysis. Structural integrity is a passive aspect of plant operation that is verified during periodic inspections. Therefore, the NRC staff finds that this TS does not meet Criterion 2.

For Criterion 3, ASME Code Class 1, 2, and 3 components that are part of the primary success path and function to mitigate DBAs or transients that either assume the failure of, or present a challenge to, the integrity/operability of these components are included in the individual specification that covers these components. The portion of this TS that is proposed to be removed addresses only the passive pressure boundary function of these components. Therefore, the NRC staff finds that this TS does not meet Criterion 3.

For Criterion 4, the requirements covered by this TS that are being removed have not been shown to be risk significant to public health and safety by either operating experience or probabilistic safety assessment. Furthermore, the requirements of this TS do not affect the risk review/unavailability monitoring of applicable structures, systems or components. Therefore, the NRC staff finds that this specification does not meet Criterion 4.

The analysis shows that none of the four criteria from 10 CFR 50.36(c)(2)(ii) are applicable to the specification proposed for deletion. The staff agrees that other TS requirements adequately address RCS structural integrity. Since TS 3/4.4.8 does not fulfill any of the 10 CFR 50.36 criteria for items for which TSs must be established, the NRC staff finds that removing TS 3/4.4.8 is acceptable. Further, the staff agrees that the removal of TS 3/4.4.8 and its associated references to structural integrity eliminates from the TSs the redundancy of structural integrity requirements that are already covered under 10 CFR 50.55a.

Normally in applying the Commission Final Policy Statement on TSs for Nuclear Power Reactors, the NRC staff would require that a licensee identify both the licensee-controlled document receiving a relocated TS and the change control mechanism that governs that document. However, in this instance, the licensee proposes deletion without relocation of the TS. The NRC staff finds this proposed deletion without relocation to be acceptable because the ASME Code Class 1, 2, and 3 structural integrity requirements continue to be covered under 10 CFR 50.55a, which the licensee must comply with.

In the application dated February 25, 2009, the licensee included TS Bases pages xx and B 3/4 4-6. These pages are not being issued to the licensee with these amendments because they are under the control of the licensee's TS Bases Control Program, specified in TS 6.8.4.h for LGS, Units 1 and 2.

4.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Pennsylvania State official was notified of the proposed issuance of the amendment. The State official had no comments.

5.0 ENVIRONMENTAL CONSIDERATION

The amendment changes a requirement with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20 or which changes an inspection or surveillance requirement. The NRC staff has determined that the amendment involves no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendment involves no significant hazards consideration, and there has been no public comment on such finding (73 FR 37505). Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendment.

6.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributors: P. Purtscher
P. Bamford

Date: February 24, 2010

February 24, 2010

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 - ISSUANCE OF AMENDMENTS RE: REMOVAL OF TECHNICAL SPECIFICATION CONCERNING STRUCTURAL INTEGRITY REQUIREMENTS (TAC NOS. ME0740 AND ME0741)

Dear Mr. Pardee:

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The amendments consist of the removal of structural integrity requirements contained in TS 3/4.4.8 for American Society of Mechanical Engineers (ASME) Code Class 1, 2 and 3 components. Requirements for ASME Code Class 1, 2 and 3 components at LGS continues to be specified in Title 10 of the *Code of Federal Regulations,* Section 50.55a, "Codes and Standards."

A copy of the Safety Evaluation is also enclosed. The Notice of Issuance will be included in the Commission's biweekly *Federal Register* notice.

Sincerely,
/ra/
Peter Bamford, Project Manager
Plant Licensing Branch I-2
Division of Operating Reactor Licensing
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Amendment Accession Number: ML100130562 *via correspondence

	LPLI-2/PM	LPLI-2/LA	CVIB/BC	ITSB/BC	OGC (NLO)	LPLI-2/BC
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Date	1/13/10	1/19/10	12/14/2009	2/2/10	2/19/10	2/24/10

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