UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION I
475 ALLENDALE ROAD
KING OF PRUSSIA, PA 19406-1415

January 29, 2010

Mr. Charles G. Pardee
Senior Vice President, Exelon Generating Company, LLC
President and Chief Nuclear Officer, Exelon Nuclear
4300 Winfield Rd.
Warrenville, IL 60555

SUBJECT: LIMERICK GENERATING STATION – NOTIFICATION OF CONDUCT OF A TRIENNIAL FIRE PROTECTION BASELINE INSPECTION

Dear Mr. Pardee:

The purpose of this letter is to notify you that the U.S. Nuclear Regulatory Commission (NRC) Region I staff will conduct a triennial fire protection baseline inspection at the Limerick Generating Station in May 2010. The inspection team will be led by Keith Young from the NRC Region I office. The team will be composed of personnel from the NRC Region I. The inspection will be conducted in accordance with NRC inspection procedure 71111.05T, the NRC's baseline fire protection inspection procedure.

The schedule for the inspection is as follows:

- Information gathering visit – Week of April 26, 2010
- Weeks of onsite inspection – May 10-14 and May 24-28, 2010

The purposes of the information gathering visit are to obtain information and documentation needed to support the inspection, to become familiar with the station fire protection programs, fire protection features, post-fire safe shutdown capabilities and plant layout, mitigating strategies to address Section B.5.b of the Interim Compensatory Measures Order, EA-02-026, of February 25, 2002, 10 CFR 50.54(hh)(2); and, as necessary, obtain plant specific site access training and badging for unescorted access. A list of the types of documents the team may be interested in reviewing and possibly obtaining, are listed in Enclosures 1 and 2. The team leader will contact you with specific document requests prior to the information gathering visit.

During the information gathering visit, the team will also discuss the following inspection support administrative details: office space size and location; specific documents requested to be made available to the team in their office spaces; arrangements for reactor site access, including radiation protection training, security, safety, and fitness for duty requirements; and the availability of knowledgeable plant engineering and licensing organization personnel to serve as points of contact during the inspection.

We request that during the onsite inspection week you ensure that copies of analyses, evaluations, or documentation regarding the implementation and maintenance of the Limerick Generating Station fire protection program, including post-fire safe shutdown capability, be readily accessible to the team for their review. Of specific interest for the fire protection portion of the inspection are those documents which establish that your fire protection program satisfies NRC regulatory requirements and conforms to applicable NRC and industry fire protection guidance. For the B.5.b portion of the inspection, those documents implementing your mitigating strategies and demonstrating the management of your commitments for the strategies are of specific interest. Also, personnel should be available at the site during the inspection who are knowledgeable regarding those plant systems required to achieve and maintain safe shutdown conditions from inside and outside the control room, including the electrical aspects of the relevant post-fire safe shutdown analyses, reactor plant fire protection systems and features, and the Limerick Generating Station fire protection program and its implementation.

This letter does not contain new or amended information collection requirements subject to the Paperwork Reduction Act of 1995 (44 U.S.C. 3501 et seq.). Existing information collection requirements were approved by the Office of Management and Budget, control number 3150-0011. The NRC may not conduct or sponsor, and a person is not required to respond to, a request for information or an information collection requirement unless the requesting document displays a currently valid Office of Management and Budget control number.

Your cooperation and support during this inspection will be appreciated. If you have questions concerning this inspection, or the inspection team's information or logistical needs, please contact Keith Young, the team leader in the Region I Office at (610) 337-5293.

Sincerely,

John F. Rogge, Chief
Engineering Branch 3
Division of Reactor Safety

Docket Nos. 50-352, 50-353
License Nos. NPF-39, NPF-85

Enclosures: 1) List of Reactor Fire Protection Program Supporting Documentation
2) Mitigating Strategies Supporting Documentation

cc: Distribution via ListServ

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/RA/
John F. Rogge, Chief
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2) Mitigating Strategies Supporting Documentation

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ENCLOSURE 1

Reactor Fire Protection Program Supporting Documentation

[Note: This is a broad list of the documents the NRC inspection team may be interested in reviewing, and possibly obtaining, during the information gathering site visit.]

1. The current version of the Fire Protection Program and Fire Hazards Analysis.

2. Current versions of the fire protection program implementing procedures (e.g., administrative controls, surveillance testing, and fire brigade.)

3. Fire brigade training program and pre-fire plans.

4. Post-fire safe shutdown systems and separation analysis.

5. Post-fire alternative shutdown analysis.

6. Piping and instrumentation (flow) diagrams showing the systems and components used to achieve and maintain hot standby and cold shutdown for fires outside the control room and those components used for those areas requiring alternative shutdown capability. (Reactor Core Isolation Cooling, Residual Heat Removal, Control Rod Drive, Condensate and Feedwater, High Pressure Coolant Injection, Core Spray, Emergency Service Water, RHR Service Water, Instrument Air, Component Cooling, Main Steam, Reactor Coolant and Reactor Water Cleanup Systems, Reactor Vessel Instrumentation)

7. Plant layout drawings which identify the physical plant locations of hot standby and cold shutdown equipment.

8. Plant layout drawings which identify plant fire area delineation, areas protected by automatic fire suppression and detection, and the locations of fire protection equipment.

9. Plant layout drawings which identify the location of post-fire emergency lighting units.

10. Plant operating procedures which would be used for shutdown from the control room with a postulated fire occurring in any plant area outside the control room, and procedures which would be used to implement alternative shutdown capability in the event of a fire in either the control or cable spreading room.

11. Copy of most recently completed maintenance and surveillance testing procedures for alternative shutdown capability components, fire barriers, fire detectors, fire pumps and suppression systems.

12. Maintenance procedures which routinely verify fuse and circuit breaker coordination in accordance with the post-fire safe shutdown coordination analysis.

13. A sample of significant fire protection and post-fire safe shutdown related design change packages (including their associated 10 CFR 50.59 evaluations) and Generic Letter 86-10 evaluations.

14. The reactor plant's IPEEE, results of any post-IEEE reviews, and listings of actions taken/plant modifications conducted in response to IEEE information.

15. Temporary modification procedures.

16. Organization charts of site personnel down to the level of fire protection staff personnel.

17. A listing of the SERs which form the licensing basis for the reactor plant's post-fire safe shutdown configuration.

18. Procedures/instructions that control the configuration of the reactor plant's fire protection program, features and post-fire safe shutdown methodology and system design.

19. A list of applicable codes and standards related to the design of plant fire protection features and evaluations of code deviations.

20. Procedures/instructions that govern the implementation of plant modifications, maintenance, and special operations, and their impact on fire protection.

21. The three most recent fire protection QA audits and/or fire protection self-assessments.

22. Recent (last 12 months) QA surveillances of fire protection activities.

23. A listing of open fire protection and fire safe shutdown related condition reports and a listing of fire protection and fire safe shutdown condition reports closed in the past three years.

24. Listing of plant fire protection licensing basis documents.

25. A listing of plant deviations from code commitments.

26. Fire protection system health reports (last 2).

27. Lesson plans and related training information for licensed and non-licensed operators for post-fire safe shutdown (including alternative shutdown).

28. Electronic copy of current versions of the Updated Final Safety Analysis Report (FSAR), Technical Specifications, and Operating License.

29. Copies of AC and DC electrical system one line diagrams. (From offsite power grid connections down to the 120 volt level.)

ENCLOSURE 2

Mitigating Strategies Supporting Documentation

[Note: This is a broad list of the documents the NRC inspection team may be interested in reviewing, and possibly obtaining, during the information gathering site visit.]

1. A list of all modifications to regulatory commitments made to meet the requirements of Section B.5.b of the ICM Order, EA-02-026, dated February 25, 2002, the subsequently imposed license conditions, and 10 CFR 50.54(hh)(2).

2. Copies of procedures/guidelines that were revised or generated to implement the mitigation strategies. These could be extensive damage mitigation guidelines (EDMGs), severe accident management guidelines (SAMGs), emergency operating procedures (EOPs), abnormal operating procedures (AOPs), etc.

3. A matrix that shows the correlation between the mitigation strategies identified in Nuclear Energy Institute 06-12 and the site-specific procedures or guidelines that are used to implement each strategy.

4. Engineering evaluations/calculations that were used to verify engineering bases for the mitigation strategies.

5. Piping and instrumentation diagram (P&ID) or simplified flow diagrams for systems relied upon in the mitigation strategies. These could be the type used for training.

6. A modification package or simplified drawings/descriptions of modifications that were made to plant systems to implement the mitigation strategies.

7. Last completed copies of procedures used to inventory equipment (hoses, fittings, pumps, etc.) required to be used to implement the mitigation strategies.

8. A list of B.5.b strategies, if any, which have implementing details that differ from that documented in the submittals and the safety evaluation report.

9. A copy of site general arrangement drawing(s) that show the majority of buildings/areas referenced in B.5.b documents.

10. Training records/ training matrix/ lesson plans related to B.5.b.

11. Copies of Memoranda of Understanding (MOUs) (e.g., with local fire departments) required to implement any mitigating strategies.