

July 27, 2010

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: Response to Request for Additional Information – Relief Request I3R-13
Associated with Pressure Testing of the Primary Containment Instrument Gas
(PCIG) Piping

- References:
- 1) Letter from P. B. Cowan (Exelon Generation Company, LLC) to U.S. Nuclear Regulatory Commission, "Relief Request I3R-13 Associated with Pressure Testing of the Primary Containment Instrument Gas (PCIG) Piping," dated January 22, 2010
 - 2) Letter from P. Bamford (U.S. Nuclear Regulatory Commission) to M. J. Pacilio (Exelon Nuclear), "Limerick Generating Station, Units 1 and 2 – Request for Additional Information Regarding Relief Request I3R-13, Pressure Testing of Primary Containment Instrument Gas Piping (TAC NOS. ME3141 and ME3142)," dated July 14, 2010

In the Reference 1 letter, Exelon Generation Company, LLC (Exelon) submitted a relief request associated with the third 10-year interval Inservice Inspection (ISI) Program for Limerick Generating Station (LGS), Units 1 and 2. Specifically, this relief request concerns pressure testing of the Primary Containment Instrument Gas (PCIG) piping. In the Reference 2 letter, the U.S. Nuclear Regulatory Commission requested additional information. Attached is our response to this request.

Should you have any questions concerning this letter, please contact Tom Loomis at (610) 765-5510.

Respectfully,



David P. Helker
Manager – Licensing & Regulatory Affairs
Exelon Generation Company, LLC

Attachment: Response to Request for Additional Information - Relief Request I3R-13

cc: USNRC Region I, Regional Administrator
USNRC Senior Resident Inspector, LGS
USNRC Project Manager, LGS
R. R. Janati, PA Bureau of Radiation Protection

Attachment

**Response to Request for Additional Information
Relief Request I3R-13**

Question:

1. For the proposed alternative pressure decay test, what would be an acceptable rate of pressure loss above which the licensee would initiate leak detection and perform necessary corrective action to repair/replace any leakage in the piping?
2. What is the operating pressure for the PCIG piping to which the piping is required to be pressurized during system leakage test?

Response:

The pressure decay test is performed by isolating and pressurizing the associated piping to the nominal operating pressure (90 – 110 psig). The decay in pressure is then monitored through pressure monitoring instrumentation. If the acceptable pressure decay criteria of 10 psig or less in 5 minutes were not met, troubleshooting would be performed to locate the leak and correct as required.