December 9, 2010

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

FROM: Peter Bamford, Project Manager ***/ra/***
Plant Licensing Branch I-2
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

SUBJECT: LIMERICK GENERATING STATION, UNITS 1 AND 2 – ELECTRONIC TRANSMISSION, DRAFT REQUEST FOR ADDITIONAL INFORMATION REGARDING PROPOSED TECHNICAL SPECIFICATION ALLOWED OUTAGE TIME EXTENSIONS TO SUPPORT RESIDUAL HEAT REMOVAL SERVICE WATER (RHRSW) MAINTENANCE (TAC NOS. ME3551 AND ME3552)

The attached draft request for additional information (RAI) was transmitted by electronic transmission on December 8, 2010, to Mr. Glenn Stewart, at Exelon Generation Company, LLC (Exelon). This draft RAI was transmitted to facilitate the technical review being conducted by the Nuclear Regulatory Commission (NRC) staff and to support a conference call (if needed) with Exelon in order to clarify the licensee's submittal. The draft RAI is related to Exelon's submittal dated March 19, 2010, regarding Limerick Generating Station, Units 1 and 2, proposing to extend the Technical Specification allowed outage time for several systems from 72 hours to seven (7) days in order to allow for repairs of the RHRSW system piping. The draft question was sent to ensure that it was understandable, the regulatory basis was clear, and to determine if the information was previously docketed. Additionally, review of the draft RAI would allow Exelon to evaluate and agree upon a schedule to respond to the RAI. This memorandum and the attachment do not represent an NRC staff position.

Docket Nos. 50-352 and 50-353

Enclosure: As stated

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REQUEST FOR ADDITIONAL INFORMATION

LIMERICK GENERATING STATION, UNITS 1 AND 2

PROPOSED TECHNICAL SPECIFICATION - ALLOWED OUTAGE TIME EXTENSIONS

TO SUPPORT RESIDUAL HEAT REMOVAL SERVICE WATER MAINTENANCE

DOCKET NOS. 50-352 AND 50-353

By letter dated March 19, 2010 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML100810151), Exelon Generation Company, LLC (Exelon, the licensee) submitted a license amendment request proposing to extend certain Limerick Generating Station (LGS) Units 1 and 2, Technical Specification (TS) allowed outage times (AOTs). Specifically these AOTs are for the Suppression Pool Cooling mode of the Residual Heat Removal system, the Residual Heat Removal Service Water (RHRSW) system, the Emergency Service Water (ESW) system, and the A.C. Sources - Operating (Emergency Diesel Generators). The AOTs would be extended from 72 hours to seven (7) days in order to allow for repairs of the RHRSW system piping. The Nuclear Regulatory Commission (NRC) staff has been reviewing the submittal and has determined that additional information is needed to complete its review.

1. By letter dated September 30, 2010 (ADAMS Accession No. ML102710368), question number 3, the NRC requested additional information regarding the operability of systems supplied by the one loop of ESW declared inoperable to support the planned RHRSW maintenance activities. By letter dated October 29, 2010 (ADAMS Accession No. ML103060379), the licensee responded as follows regarding the Control Room Chillers:

> Inoperability of an ESW loop does not affect operability of the Main Control Room Chillers. While Limerick has two Main Control Room Chillers (one supplied from each ESW loop), the chillers are not governed by any TS. Therefore, a chiller would not be declared inoperable as a result of the associated ESW loop being administratively declared inoperable. Since either loop being declared inoperable will be available and protected, the affected loop would be expected to supply cooling water to its associated chiller as required.

Based on a review of LGS, Unit 1 and 2, TS Definition 1.25, Limiting Condition for Operation (LCO) 3.7.1.2, Action a.3, LCO 3.7.2, and Surveillance Requirement 4.7.2.1.a, as well as various descriptions provided in the LGS Updated Final Safety Analysis Report for the Control Room Chillers, this does not appear to be a correct application of the LGS TS regarding Control Room Emergency Air Treatment System, LCO 3.7.2, which the chillers support.

Please correct the response to NRC letter dated September 30, 2010, question 3, regarding the Control Room Chillers, or provide specific justification for not entering the TS Action statement for Control Room Emergency Air Treatment System, LCO 3.7.2, when one loop of ESW is declared inoperable.

Enclosure