



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

March 18, 2011

LICENSEE: Exelon Generation Company, LLC

FACILITY: Limerick Generating Station, Units 1 and 2

SUBJECT: SUMMARY OF TELEPHONE CONFERENCE CALL HELD ON JANUARY 28, 2011, BETWEEN THE U.S. NUCLEAR REGULATORY COMMISSION AND EXELON GENERATION COMPANY, LLC, CONCERNING THE PROPOSED LIMERICK GENERATING STATION, UNITS 1 AND 2, LICENSE RENEWAL APPLICATION

The U.S. Nuclear Regulatory Commission (NRC or the staff) and representatives of Exelon Generation Company, LLC, held a telephone conference call on January 28, 2011, to address questions on the proposed Limerick Generating Station, Units 1 and 2, license renewal application. The telephone conference call was useful in clarifying the intent of the Generic Aging Lessons Learned Report aging management program.

Enclosure 1 provides a listing of the participants and Enclosure 2 contains a summary of the discussion.

The applicant had an opportunity to comment on this summary.

A handwritten signature in cursive script, reading "Bennett Brady".

Bennett Brady, Program Manager  
License Renewal Branch, RPB1  
Division of License Renewal  
Office of Nuclear Reactor Regulation

Docket No. 50-352 and 50-353

Enclosures:

1. List of Participants
2. Summary of Discussion  
Information

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TELEPHONE CONFERENCE CALL  
LIMERICK GENERATING STATION, UNITS 1 AND 2  
LICENSE RENEWAL APPLICATION

LIST OF PARTICIPANTS  
JANUARY 28, 2011

**PARTICIPANTS:**

Bennett Brady  
Mathew Yoder  
Abdul Shiek  
Gene Kelly  
Christopher Wilson  
Al Fulvio  
Mark Miller

**AFFILIATIONS:**

US Nuclear Regulatory Commission (NRC)  
NRC  
NRC  
Exelon Generation Company, LLC (Exelon)  
Exelon  
Exelon  
Exelon

GENERIC AGING LESSONS LEARNED (GALL) REPORT, XI.S8 PROTECTIVE COATING  
MONITORING AND MAINTENANCE PROGRAM

LICENSE RENEWAL APPLICATION  
JANUARY 28, 2011

The U.S. Nuclear Regulatory Commission (NRC or the staff) and representatives of Exelon Generation Company, LLC, held a telephone conference call on January 28, 2011, to clarify questions on the staff's intent in the Generic Aging Lessons Learned (GALL) Report, Revision 2, AMP XI S8 Aging Management Program (AMP).

**Question from applicant:** The GALL Report, Revision 2, discusses a comparable program for monitoring and maintaining protective coatings inside containment developed in accordance with NRC Regulatory Guide (RG) 1.54, Service Level I, II, and III Protective Coatings Applied to Nuclear Power Plants, Revision 2. Are applicants required to comply with RG 1.54, Revision 2?

**NRC response:** Applicants are not required to commit to RG 1.54, Revision 2, but to provide a coating monitoring and maintenance program that is comparable to the one discussed in RG 1.54.

**Question from applicant:** Is the intent of this AMP that the applicant's coating AMP be consistent with all the standards shown on page 4 of the RG or be consistent with just certain or specific ASTM?

**NRC response:** If the applicant's program does not provide certain elements of RG 1.54, Revision 2, then the applicant should discuss how their program is consistent with those elements in RG 1.54.

**Question from the applicant:** If its coatings program meets standards other than the ASTM standards mentioned in the RG, will the applicant need to take an exception to the GALL AMP XI 58 AMP or can they describe how their program meets the intent of the standards?

**NRC response:** If applicants do not intend to meet the ASTM standards referenced in RG 1.54, Revision 2, then they should take an "exception" to the GALL AMP in the license renewal application.

**Summary:** The NRC staff expects that applicants will provide a coatings maintenance program that meets the intent of and is comparable to the program described in RG 1.54, Revision 2. Where their program does not meet RG 1.54, applicants should describe in their application how their program is comparable. However, if their coatings program does not meet the ASTM standards references on page 4 of the RG, then these elements should be described as an "exception" to the GALL AMP.

NRC staff said that the Division of Component Integrity (DCI), Office of Nuclear Reactor Regulation, is the owner of the XI S8 Program and would be reviewing this AMP in applicants' license renewal application. The Division of License Renewal, NRC, will be coordinating with DCI to address applicants' questions.'

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Bennett Brady, Program Manager  
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Letter to Exelon Generation Company, LLC from B. Brady dated March 18, 2011

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