



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

May 9, 2011

Mr. Michael J. Pacilio
President and Chief Nuclear Officer
Exelon Nuclear
4300 Winfield Road
Warrenville, IL 60555

SUBJECT: LIMERICK GENERATING STATION, UNIT NOS. 1 AND 2 - CLOSEOUT OF
GENERIC LETTER 2008-01 "MANAGING GAS ACCUMULATION IN
EMERGENCY CORE COOLING, DECAY HEAT REMOVAL, AND
CONTAINMENT SPRAY SYSTEMS" (TAC NOS. MD7841 AND MD7842)

Dear Mr. Pacilio:

On January 11, 2008, the U.S. Nuclear Regulatory Commission (NRC) issued Generic Letter (GL) 2008-01, "Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems" (Agencywide Documents Access and Management System (ADAMS) Accession No. ML072910759). The stated purpose of GL 2008-01 was: (a) to request addressees to submit information to demonstrate that the subject systems are in compliance with the current licensing and design bases and applicable regulatory requirements, and that suitable design, operational, and testing control measures are in place for maintaining this compliance; and, (b) to collect the requested information to determine if additional regulatory action is required.

GL 2008-01 requested that licensees provide the following information within 9 months of the date of the GL:

- (a) A description of the results of evaluations that were performed pursuant to requested actions specified in the GL. The description was to provide sufficient information to demonstrate that you are or will be in compliance with the quality assurance criteria in Sections III, V, XI, XVI, and XVII of Appendix B to 10 CFR Part 50 and the licensing basis and operating license as those requirements apply to the subject systems;
- (b) A description of all corrective actions, including plant, programmatic, procedure, and licensing basis modifications that you determined were necessary to assure compliance with these regulations; and,
- (c) A statement regarding which corrective actions were completed, the schedule for completing the remaining corrective actions, and the basis for that schedule.

By letters dated April 11, 2008 (ADAMS Accession No. ML081020758), October 14, 2008 (ML082880706), July 7, 2009 (ML091880507), March 11, 2010 (ML100710311), and April 9, 2010 (ML101060265), Exelon Generation Company, LLC (Exelon, the licensee), provided responses to Generic Letter 2008-01. The March 11, 2010, letter provided a response to NRC staff questions in a request for additional information (RAI), which are evaluated below:

- In RAI 1, the NRC staff questioned the surveillance procedure locations, intervals, criteria, and actions associated with found voids. The licensee stated that periodic ultrasonic test (UT) inspections will be performed at high point location(s) of the Core Spray, Residual Heat Removal, and High Pressure Coolant Injection piping. The planned surveillance interval for the periodic UT inspections discussed above is 31 days. This interval may change to be more or less frequent based on the trends resulting from the inspections. These periodic inspections will be in addition to the UT inspections that are performed as part of system fill and vent activities during system restoration following maintenance. The licensee is actively participating in the Nuclear Energy Institute (NEI) Gas Accumulation Team (GAT) that is working to determine the most appropriate criteria and void evaluation methods. The licensee will continue to use available industry guidance until such time that NRC guidance is available. The licensee's procedures require documentation of the surveillance including quantification of void size. An issue report is required to be written if there is a failure to meet the surveillance criteria. Both the surveillance results and issue reports are trended. The NRC staff finds that the surveillance procedure locations, intervals, criteria, and actions associated with found voids described in the RAI are responsive to the GL.
- In RAI 2, the NRC staff requested additional information on the licensee's training programs with respect to gas intrusion. The licensee stated that Exelon is an active participant in the NEI GAT that is working with the Institute of Nuclear Power Operations on developing generic modules for gas accumulation and management. The licensee plans to evaluate the models for incorporation into training. The NRC staff finds this to be responsive to the GL.

Based upon the information in Exelon's April 11, 2008, October 14, 2008, July 7, 2009, and April 9, 2010, letters and the response to NRC staff questions in Exelon's March 11, 2010, letter, the NRC staff finds Exelon's response to the GL to be acceptable. This includes the responses to the schedule-related information requested in the GL. Consequently, your GL 2008-01 response is considered closed and no further information or action is requested of you. Notwithstanding, an inspection using Temporary Instruction (TI) 2515/177, "Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems (NRC Generic Letter 2008-01)" (ADAMS Accession No. ML082950666) may be performed by the NRC's Region I staff. TI 2515/177 is confirmatory in nature in that it directs NRC inspectors to selectively verify that the licensee has implemented or is in the process of acceptably implementing the commitments, modifications, and programmatically controlled actions described in the licensee's response to GL 2008-01 and the plant-specific information supports a conclusion that subject systems operability is reasonably ensured.

M. Pacilio

- 3 -

Please contact me at 301-415-2833, if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Peter Bamford". The signature is written in a cursive style with a large, looping initial "P".

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

cc: Distribution via Listserv

M. Pacilio

- 3 -

Please contact me at 301-415-2833, if you have any questions.

Sincerely,

/RA/

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

cc: Distribution via Listserv

DISTRIBUTION:

PUBLIC	RidsOgcRp Resource	LPLI-2 R/F
RidsAcrsAcnw_MailCTR Resource	RidsNrrDssSrx Resource	JGall, NRR
RidsRgn1MailCenter Resource	RidsNrrDoriDpr Resource	RidsNrrDoriLpl1-2 Resource
RidsNrrPMLimerick Resource	RidsNrrLAABaxter Resource	

ADAMS Accession Number: ML111260363

* concurrence via memo

OFFICE	LPLI-2/PM	LPLI-2/LA	SRXB/BC	LPL1-2/BC
NAME	PBamford	ABaxter	AUIses*	HChernoff
DATE	5/6/2011	5/9/11	05/03/2011	5/9/2011

OFFICIAL RECORD COPY