



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

September 15, 2011

Mr. Michael P. Gallagher  
Vice President License Renewal Projects  
Exelon Generation Company, LLC  
200 Exelon Way  
Kennett Square, PA 19348

SUBJECT: PLAN FOR THE SCOPING AND SCREENING REGULATORY AUDIT  
REGARDING THE LIMERICK GENERATING STATION, UNITS 1 AND 2  
LICENSE RENEWAL APPLICATION REVIEW (TAC NOS. ME6555 and  
ME6556)

Dear Mr. Gallagher:

By letter, dated June 22, 2011, Exelon Generation Company, LLC (Exelon or the applicant) submitted an application for renewal of operating licenses NPF-39 and NPF-85 for the Limerick Generating Station (LGS) Units 1 and 2. The staff of the U.S. Nuclear Regulatory Commission (NRC or the staff) is reviewing this application in accordance with the guidance in NUREG-1800, "Standard Review Plan for Review of License Renewal Applications for Nuclear Power Plants."

The staff plans to conduct its scoping and screening regulatory audit at Limerick Generating Station, Units 1 and 2 during the week of September 19, 2011, in accordance with the enclosed regulatory audit plan. If you have any questions, please contact me by telephone at (301) 415-3733 or by e-mail at [Robert.Kuntz@nrc.gov](mailto:Robert.Kuntz@nrc.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "R. Kuntz", written over a large, stylized, abstract scribble.

Robert F. Kuntz, Senior Project Manager  
Reactor Projects Branch 1  
Division of License Renewal  
Office of Nuclear Reactor Regulation

Docket No. 50-352 and 50-353

Enclosure: Audit Plan

cc w/encl: Listserv



## **Audit Plan**

# **Scoping and Screening Review for the Limerick Generating Station License Renewal Application**

**September 19, 2011**

**Division of License Renewal  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission**

ENCLOSURE

## **License Renewal Aging Management Program Audit Plan Limerick Generating Station**

### **1. Background**

By letter dated June 22, 2011, Exelon Generation Company, LLC (Exelon or the applicant), submitted to the U.S. Nuclear Regulatory Commission (NRC or the staff) its application for renewal of operating license nos. NPF-39 and NPF-85 for the Limerick Generating Station (LGS) Units 1 and 2. LGS requested renewal of operating licenses for an additional 20 years beyond the 40-year current license terms, which expire on October 26, 2024 for Unit 1 and June 22, 2029 for Unit 2. The staff from the Division of License Renewal will lead a regulatory audit to gain a better understanding of the documentation and methodology used by Exelon to identify the systems, structures and components to be included within the scope of license renewal and subject to an aging management review, in accordance with the requirements of 10 CFR 54.4(a) for scoping and 10 CFR 54.21 for screening.

### **2. Regulatory Audit Bases**

License renewal requirements are specified in Title 10 of the *Code of Federal Regulations* (CFR), Part 54 (10 CFR Part 54), "Requirements for Renewal of Operating Licenses for Nuclear Power Plants." Guidance is provided in NUREG-1800, Rev. 2, "Standard Review Plan for Review of License Renewal Applications for Nuclear Power Plants" (SRP-LR), dated December 2010, and NUREG-1801, Rev. 2, "Generic Aging Lessons Learned (GALL) Report," dated December 2010.

### **3. Regulatory Audit Scope**

The scope of this regulatory audit for LGS is a review of the methodology used by Exelon to identify the systems, structures and components to be included within the scope of license renewal and subject to an aging management review, in accordance with the requirements of 10 CFR 54.4(a) for scoping and 10 CFR 54.21 for screening.

### **4. Information and Other Material Necessary for the Regulatory Audit**

The project team will review the scoping and screening process as documented in the license renewal application, implementing procedures, reports and drawings. The project team will review:

- Engineering reports and procedures which contain requirements or guidelines for the implementation of scoping and screening methodology.
- 10 CFR 54.4(a)(1) plant evaluations and implementing procedures.
- 10 CFR 54.4(a)(2) plant evaluations and implementing procedures.
- 10 CFR 54.4(a)(3) plant evaluations, implementing procedures and any specific analyses performed.

- Description of the design basis events included in the Updated Final Safety Analysis Report (UFSAR), and all other additional events (e.g., high energy line break, fire, high wind, earthquakes, flooding, tornadoes), which were evaluated during the scoping process.
- License renewal drawings.
- System design basis documents and system and component level scoping and screening reports for the selected systems and structures.
- Documentation of quality assurance activities associated with license renewal application development.
- Documentation of training activities associated with license renewal application development.
- Assisted access to the plant equipment database and administrative controls procedure.
- Assisted access to the corrective action and operating experience programs database.

**5. Team Assignments**

<b>Area of Review</b>	<b>Assigned Auditor</b>
Scoping and Screening	Bill Rogers
Scoping and Screening	Angela Buford
Scoping and Screening	Stacie Sakai
Scoping and Screening	Don Brittner
Scoping and Screening	Gary Armstrong
Scoping and Screening	Ed Smith

**6. Logistics**

The audit will be conducted at Exelon Generation Company, LLC at LGS during the week of September 19. Entrance and exit briefings will be held at the beginning and end of this audit, respectively.

**7. Special Requests**

The staff requests that the applicant make available the condition report database for independent searches by the regulatory audit team.

**8. Deliverables**

An audit report should be issued to the applicant within 90 days from the end of the audit.

September 15, 2011

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Vice President License Renewal Projects  
Exelon Generation Company, LLC  
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Sincerely,  
*/RA/*

Robert F. Kuntz, Senior Project Manager  
Reactor Projects Branch 1  
Division of License Renewal  
Office of Nuclear Reactor Regulation

Docket No. 50-352 and 50-353

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cc w/encl: Listserv

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OFFICE	PM:RPB1:DLR	LA:RPOB:DLR	BC:RPB1:DLR	PM:RPB1:DLR
NAME	RKuntz	SFiguroa	DMorey (LRegner for)	RKuntz
DATE	09/13/11	09/12/11	09/15/11	09/15/11

OFFICIAL RECORD COPY

Letter to Michael P. Gallagher from Robert F. Kuntz dated September 15, 2011

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