



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

September 20, 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 AGING MANAGEMENT PROGRAM REGULATORY AUDIT  
REGARDING THE LIMERICK GENERATING STATION, UNITS 1 AND 2  
LICENSE RENEWAL APPLICATION REVIEW (TAC NOS. ME6555, 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 Aging Management Program regulatory audit at Exelon Generation Company, LLC during the weeks of October 3 and October 11, 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 be "R. Kuntz", written over a faint, stylized graphic element.

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

Docket Nos.: 50-352, 50-353

Enclosure:  
As stated

cc w/encl: Listserv



**Audit Plan**

**Aging Management Program Review  
for the Limerick Generating Station  
License Renewal Application**

**October 3 – 14, 2011**

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

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## **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 licenses 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 applicant's Aging Management Programs, Aging Management Reviews, and associated bases and documentation as applicable.

### **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 audit is to: (a) examine the applicant's Aging Management Programs (AMPs) for LGS Units 1 and 2; and (b) verify the applicant's claims of consistency with the corresponding GALL Report AMPs. Enhancements to AMPs will be evaluated on a case-by-case basis. Exceptions to the GALL Report AMP elements will be evaluated separately as part of the NRC staff's review of the license renewal application (LRA), and will be documented in the staff's Safety Evaluation Report (SER).

The SRP-LR allows an applicant's LRA to reference its AMPs as being consistent with the AMPs described in the GALL Report. By referencing the GALL Report AMPs in this manner, the applicant is concluding that its AMPs correspond to those AMPs and that no further staff review should be required. If an applicant credits an AMP for being consistent with a GALL Report program, it is incumbent on the applicant to ensure that the plant program contains all of the elements of the referenced GALL Report program. The applicant's determination shall be documented and maintained in an auditable, retrievable form.

During this audit, the staff will audit program elements 1 - 6 (scope, preventive actions, parameters monitored or inspected, detection of aging effects, monitoring and trending, and acceptance criteria), and program element 10, (operating experience), of the applicant's AMPs claimed to be consistent with the GALL Report against the equivalent elements of the associated AMP described in the GALL Report, unless otherwise indicated. Program elements 7 - 9 (corrective actions, confirmation process, and administrative controls) are audited by another NRC project team during the scoping and screening methodology audit, and are evaluated separately. In addition, the staff will verify that the conditions at the plant are bounded by the conditions for which the GALL Report program was evaluated.

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The staff will also examine the applicant's program bases documents and related references for these AMPs, perform selected in-plant walkdowns, and interview applicant representatives to obtain additional clarification related to the AMPs.

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

The project team will review the license renewal application, the AMP basis documents and other applicant supporting documents as appropriate.

The project team would like for at least one hard-copy set of AMPs, AMP basis documents, and all other relevant documentation to be available in the team's work room.

Work space and team support logistics:

- One general team work area with seating and laptop space for 17 people.
- Three break-out rooms for question/answer/small group sessions and meetings, so that work in the main room will not be disrupted.
- Telephone access for in-plant and/or outside business-related calls. The break-out rooms should also have speaker phone capability for conference calls.
- Access to printers.
- Access to a copier.

#### 4. Team Assignments

Staff participation is projected as follows. Some deletions, additions or substitutions may occur on an as-needed basis:

*Week of October 3, 2011*

Area of Review	Assigned Auditor
Project Manager	Robert Kuntz
Branch Chief	David Pelton
Mechanical	Tony Gardner William Holston Matthew Homiack Roger Kalikian Michelle Kichline John Klos Seung Min Tom Morgan Ching Ng John Wise On Yee

<b>Area of Review</b>	<b>Assigned Auditor</b>
Operating Experience	Don Brittner

*Week of October 11, 2011*

<b>Area of Review</b>	<b>Assigned Auditor</b>
Project Manager	Robert Kuntz
Branch Chief	Rajender Auluck
Structural	Angela Burford Bryce Lehman Dan Naus, Oak Ridge National Laboratory Andrew Prinaris Abdul Sheikh Ata Istar
Electrical	Cliff Doult Duc Nguyen Rui Li
Operating Experience	Don Brittner

#### **6. Logistics**

The audit will be conducted at LGS during the weeks of October 3 and October 11, 2013. Entrance and exit briefings will be held at the beginning and end of this audit, respectively.

#### **7. Special Requests**

The staff requests the applicant to make available their 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 20, 2011

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Vice President License Renewal Projects  
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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 Nos.: 50-352, 50-353

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DISTRIBUTION:  
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OFFICE	PM:RPB1:DLR	LA:RPOB:DLR	BC:RPB1:DLR	PM:RPB1:DLR
NAME	RKuntz	SFigueroa*	DMorey	RKuntz
DATE	9/19/11	9/15/11	09/20/11	09/20/11

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