Exelon Nuclear

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U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

Limerick Generating Station, Units 1 and 2
Facility Operating License Nos. NPF-39 and NPF-85
NRC Docket Nos. 50-352 and 50-353

Subject: Annual Commitment Change Summary Report

This report summarizes Limerick changes to NRC commitments that meet the threshold for reporting for the period from July 1, 2010 to June 30, 2011. Changes to these commitments are performed using procedure LS-AA-110, Commitment Management, which employs the guidance provided in NEI 99-04, Guidelines for Managing NRC Commitment Changes. NEI 99-04 was approved by the NRC for licensee use by SECY-00-045, Acceptance of NEI 99-04, 'Guidelines for Managing NRC Commitments'. Licensees were informed that NEI 99-04 was an acceptable process for control of regulatory commitments by the issuance of RIS 2000-17, Managing Regulatory Commitments made by Power Reactor Licensees to the NRC Staff, on September 21, 2000.

There are no new regulatory commitments contained in this letter.

If you have any questions or require additional information, please do not hesitate to contact us.

Sincerely,

Original signed by

William F. Maguire
Vice President – Limerick
Exelon Generation Company, LLC

Attachment: List of changes to NRC commitments

cc: Administrator Region I, USNRC
USNRC Senior Resident Inspector, LGS

LS-AA-110 Commitment Management, Section 4.7, “NRC Notification of Commitment Changes/Deletions”, requires submittal of a written report once per calendar year. This report shall contain a summary of commitment changes that require NRC notification.

The following commitment changes were implemented between July 1, 2010 and June 30, 2011 and require NRC notification.

Commitment change tracking number:	2010-013
CT number:	T04156
Commitment source document:	Response to GL 88-20 supplement 4 dated 6/26/95
Change:	Revised
Requestor:	Operations

Subject:

Limerick response to NRC Generic Letter 88-20 Supplement 4, "Individual Plant Examination of External Events (IPEEE) for Severe Accident Vulnerabilities".

Statement of commitment:

Fire brigade drill activities and fire brigade awareness will be increased for 3 areas in the common control structure.

Change to commitment:

The commitment was revised to state "Fire drill scenarios should focus on realistic situations based on plant operating experience and that challenge plant operations in risk significant areas."

Justification for change:

Update commitment to extend focus of drills to all areas of the plant that could have major impact on plant operations.

Commitment change tracking number:	2010-014
CT numbers:	T02008
Commitment source documents:	Letter to NRC dated 12/9/91
Change:	Deleted
Requestor:	Maintenance

Subject:

Limerick Unit 1 reply to a notice of violation in NRC Inspection Reports 91-18 (Unit 1) and 91-19 (Unit 2)

Statement of commitment:

The General Weld Procedure (GWP) was revised to clarify that no welding is to be performed on surfaces when moisture or water are present.

Change to commitment:

Deleted

Justification for change:

The PECO Weld Manual was superseded by Exelon procure CC-AA-501 T&RMs. CC-AA-501-1013 prohibits wet welding. In addition, ASME Code section III prohibits wet welding. Compliance with ASME III is mandatory.

Commitment change tracking number:	2010-015
CT number:	T00708
Commitment source document:	Reply to NOV dated 3/1/90
Change:	Deleted
Requestor:	Reactor Engineering

Subject:

Limerick Unit 2 reply to a Notice of Violation in NRS Inspection Report 89-32

Statement of commitment:

1. Reactor Engineering implementing procedures will be developed to supplement Procedure A-44, "Special Nuclear Material Accountability," and will include the following:

a. Provide detailed instructions for the onsite handling of a DOE/NRC Form 741. These instructions will include the formal transmittal of the DOE/NRC Form 741 to the corporate office. This will ensure that every DOE/NRC Form 741 is recorded into the LGS SNM Accountability System and included into the next required DOE/NRC Form 742.

b. Provide guidance to assure that communication is coordinated between the plant and corporate groups which handle SNM accountability.

2. Reactor Engineers and the various other personnel working with SNM items will receive formal training in SNM identification, handling, security, and regulatory requirements. This training will include a yearly one day requalification training for the Reactor Engineers. The SNM formal training sessions will begin during the 1991 calendar year. While the lesson plans for this formal training are being developed, Reactor Engineering personnel will receive training within their group on the handling and identification of SNM.

In addition to the Corrective Actions identified in Items 1 and 2 as stated above, the following additional actions will be implemented.

A. Detailed routine procedures to supplement Procedure A-44 will be written to:

i. govern the recording and logging of all movement of SNM at LGS, and

ii. control the handling, security, and tagging requirements of SNM.

These items will be completed and implemented by April 30, 1990.

B. Procedure A-44 will be revised to accomplish the following.

i. Provide guidance to outline work group interactions and regulations governing the procedures to be implemented in the additional Action A, as stated above.

ii. Provide for tagging of all SNM in storage or transit by requiring the use of distinctive tags. The tags will identify the SNM and will require Reactor Engineering approval prior to the SNM being moved. The significance of SNM tags will be addressed as part of General Employee Training (GET).

C. Additional Reactor Engineering implementing procedures will be developed to supplement Procedure A-44 to accomplish the following:

i. Control the increased physical barriers for SNM that will be developed (i.e., locked storage cage for SNM and LGS storeroom computer coding that notifies Reactor Engineering when SNM is being "signed out" or removed from the storeroom).

ii. A detailed routine procedure will be written to supplement Surveillance Test Procedure ST-3-097-350-0, "Annual Inventory of Special Nuclear Material," to conduct increased periodic auditing of SNM at LGS.

Change to commitment:

Deleted

Justification for change:

The original commitment description lists the corrective actions to avoid future non-compliance. The original commitment was not necessary to comply with the Notice of Violation. Procedural control of Special Nuclear Material (SNM) processes are documented in the NF-AA-300 series procedures. Specifically, procedures NF-AA-300, "Special Nuclear Material Control and Accountability"; NF-AA-309, "Special Nuclear Material and Core Component Move Sheet Development"; NF-AA-310, "Special Nuclear Material and Core Component Movement"; and NF-AA-320, "Controlling Special Nuclear Material Receipt and Shipment" govern the following activities described in the commitment:

- Detailed instruction for processing of DOE/NRC 741 forms (now a corporate activity)
- Provide guidance to assure that communication is coordinated between the plant and corporate groups which handle SNM accountability
- Govern the recording and logging of all movement of SNM
- Control the handling, security, and tagging requirements of SNM
- Provide guidance to outline work group interactions
- Provide for procedural control of tagging of all SNM in storage or transit by requiring the use of distinctive tags

Technical review of future revisions to these procedures requires a Station Qualified Reviewer review of the proposed changes during the site review process, providing adequate assurance that the corrective actions will remain intact.

Procedure RT-3-000-044-0, "SNM Status Review", supplements activities already captured in the NF-AA-300 series procedures and provides for increased periodic auditing and control of SNM. Technical review of future revisions to this procedure requires a Station Qualified Reviewer review of the proposed changes during the review process, providing adequate assurance that the corrective actions will remain intact.

Reactor Engineers performing activities in support of SNM are now required to be qualified under Engineering Training Certification Guide N-AN-ENG-CERT-RX02, "Special Nuclear Material Handler", and/or N-AN-ENG-CERT-RX04, "SNM Coordinator/Custodian". This fulfills the original commitment that Reactor Engineers be formally trained in SNM identification, handling, security, and other regulatory requirements.

Commitment change tracking number:	2010-017
CT number:	T03848
Commitment source document:	Generic Letter 94-03
Change:	Deleted
Requestor:	Engineering

Subject:

Core Shroud Weld ISI Inspections

Statement of commitment:

Intergrannular Stress Corrosion Cracking of Core Shrouds in Boiling Water Reactors –
The Generic Letter required submittal of core shroud weld inspection schedules, safety analysis, shroud drawings, and a history of completed shroud inspections. It also required specific shroud inspections to be performed.

Change to commitment:

Deleted

Justification for change:

Limerick Generating Station did provide a response to the Generic Letter (NLTN 940824), and did schedule and perform the requested shroud weld inspections (Li1R06 and Li2R03). Additionally, Limerick has continued to schedule and perform shroud weld inspections in accordance with the guidance provided by the Boiling Water Reactor Vessel and Internals Project (BWRVIP). Currently, Limerick Generating Station follows the Core Shroud inspection guidance issued by the BWRVIP (BWRVIP-76).

Commitment change tracking number:	2010-018
CT number:	T03843
Commitment source document:	NRC Bulletin 80-13
Change:	Deleted
Requestor:	Engineering

Subject:

Core Spray Sparger ISI Inspections

Statement of commitment:

Cracks in core spray spargers – The bulletin was addressed to operating plants with 304 Stainless Steel. However, Limerick has installed low carbon 304 stainless steel. This material is less susceptible to IGSCC. Limerick has reviewed the matter and additionally plans to include periodic inspections of the core spray spargers in the Plant In-Service Inspection Program which will be issued approximately 6 months after commercial operation.

Change to commitment:

Deleted

Justification for change:

Limerick Generating Station is satisfying the intent of NRC Bulletin 80-13 by following BWRVIP-18-A. In fact, within the NRC's Final Safety Evaluation of BWRVIP-18-A, the NRC states the following:

"The intent of the subject document [BWRVIP-18] was, when approved by the NRC, to replace the inspection guidance contained in the NRC's Bulletin 80-13, "Cracking in Core Spray Spargers," dated May 12, 1980, which requested licensees to inspect their core spray spargers and the segment of piping between the inlet nozzle and the vessel shroud."

Therefore, since Limerick Generating Station is committed to implementing BWRVIP guidelines, including the latest revision of BWRVIP-18 per T04644, this commitment to NRC Bulletin 80-13 can be deleted.

Commitment change tracking number:	2011-002
CT number:	T02251
Commitment source document:	Response to GL dated 12-28-89
Change:	Deleted
Requestor:	Maintenance

Subject:

Generic Letter 89-10 "Safety-Related Motor-Operated Valve Testing and Surveillance"

Statement of commitment:

Procedure M-500-020 has been prepared and approved to ensure proper torque and limit switch settings.

Change to commitment:

Deleted

Justification for change:

Proper torque and limit switch setting control is now part of the GL 96-05 MOV Program. GL 96-05 establishes the requirement for an on-going safety related MOV program, and provides long term control and periodic verification of MOV torque and limit switch settings.