

LimerickNPEm Resource

From: Kuntz, Robert
Sent: Tuesday, May 01, 2012 2:14 PM
To: Anthony Z. Roisman; gfettus@nrdc.org
Cc: Smith, Maxwell; Kanatas, Catherine
Subject: FW: DRAFT Teleconference summaries
Attachments: 2-17-12 Telecon summary.docx; 1-18-12 Telecon summary.docx

From: Kuntz, Robert
Sent: Tuesday, April 17, 2012 2:05 PM
To: 'Christopher.Wilson2@exeloncorp.com'
Subject: DRAFT Teleconference summaries

Chris,

Attached are 2 DRAFT teleconference summaries. These summaries are from calls held January 18 and February 27, 2012. Let me know if Exelon has any comments on the attached summaries by Friday April 12, 2012.

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LICENSEE: Exelon Generation Company, LLC

FACILITY: Limerick Generating Station

SUBJECT: SUMMARY OF TELEPHONE CONFERENCE CALL HELD ON FEBRUARY 17, 2012, BETWEEN THE U.S. NUCLEAR REGULATORY COMMISSION AND EXELON GENERATION COMPANY, LLC, CONCERNING REQUESTS FOR ADDITIONAL INFORMATION PERTAINING TO THE LIMERICK GENERATING STATION, LICENSE RENEWAL APPLICATION (TAC. NOS. ME6555 AND ME6556)

The U.S. Nuclear Regulatory Commission (NRC or the staff) and representatives of Exelon Generation Company, LLC held a telephone conference call on February 17, 2012, to discuss and clarify the staff's requests for additional information (RAIs) concerning the Limerick Generating Station license renewal application. The telephone conference call was useful in clarifying the intent of the staff's RAIs.

Enclosure 1 provides a listing of the participants and Enclosure 2 contains a listing of the RAIs discussed with the applicant, including a brief description on the status of the items.

The applicant had an opportunity to comment on this summary.

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

Docket Nos. 50-352 and 50-353

Enclosures:

1. List of Participants
2. List of Requests for Additional Information

cc w/encls: Listserv

LICENSEE: Exelon Generation Company, LLC

FACILITY: Limerick Generating Station

SUBJECT: SUMMARY OF TELEPHONE CONFERENCE CALL HELD ON FEBRUARY 17, 2012, BETWEEN THE U.S. NUCLEAR REGULATORY COMMISSION AND EXELON GENERATION COMPANY, LLC, CONCERNING REQUESTS FOR ADDITIONAL INFORMATION PERTAINING TO THE LIMERICK GENERATING STATION, LICENSE RENEWAL APPLICATION (TAC. NOS. ME6555 AND ME6556)

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Division of License Renewal
Office of Nuclear Reactor Regulation

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DISTRIBUTION: See next page

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DATE	04 / /12	04 / /12	04/ /12	04 / /12

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TELEPHONE CONFERENCE CALL
LIMERICK GENERATING STATION
LICENSE RENEWAL APPLICATION

LIST OF PARTICIPANTS
February 17, 2011

PARTICIPANTS

Robert Kuntz
Garry Armstrong
Ed Smith
Christopher Wilson
Gene Kelly
Jim Jordan
Mary Kowalski
Mark Miller
Ron Hess

AFFILIATIONS

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

DRAI 2.2-1

The scoping criteria are described in Section 2.1 of license renewal application (LRA). LRA Section 2.2, Table 2.2-1, "Scoping Results," provides the results of applying the license renewal scoping criteria to systems, structures, and components (SSCs). The following systems, as described in the Updated Final Safety Analysis Report (UFSAR), could not be located in LRA Table 2.2-1.

UFSAR Section	System
1.2.4.3.1.7 Plant Monitoring System (PMS)	Plant Monitoring System
7.1.2.1.12 Area Radiation Monitoring System	Area Radiation Monitoring System
7.1.2.1.13 Process Computer System - Instrumentation	Process Computer System
7.1.2.1.46 Emergency Response Facility Data System	Emergency Response Facility Data System
9.4.3.2.4 Chemistry Laboratory Expansion	Chemistry Laboratory Air Supply and Exhaust Systems

Justify the exclusion of the above systems from Table 2.2-1.

Discussion: The applicant indicated that the request is clear, but did point out that the citation to UFSAR Section 7.1.2.1.13 "Process Computer System – Instrumentation" was addressed in a response to the NRC dated January 27, 2012. The NRC staff reviewed the January 27, 2012 response and confirmed that this item has been addressed. Therefore, this DRAI will be sent as a formal RAI with the exception of the citation to UFSAR Section 7.1.2.1.13.

DRAI 2.3.3-1

For the license renewal boundary drawing locations identified in the table below, the staff could not determine the basis for the change in scoping criteria from 10 CFR 54.4 (a)(1) to 10 CFR 54.4 (a)(2).

Nonsafety-related/Safety-Related Interface Item	License Renewal Boundary Drawing Number & Location	Explanation of Issue
2.3.3.17 Process Radiation Monitoring System		
a	LR-M-26 Sheet 4, location H-6	½" SST line connected to "Sample B" line.
2.3.3.4 Containment Enclosure Ventilation System		
a	LR-M-78 Sheet 1, locations D-5 thru D-7 and F-5 thru F-7	At valves 0001A, 0002A, 0003A, 0005A and 0001B, 0002B, 0003B, 0005B.

b	LR-M-90 Sheet 1, locations D-2, D-4, D-7, E-3, G-4,	Several ¾" lines to vent and 1" drain lines.
c	LR-M-90 Sheet 2, Multiple locations	All capped ¾" vent and drain lines.
2.3.3.8 Emergency Diesel Generator System		
a	LR-M-20 Sheets 7 and 13, locations C-3, E-3, E-5, D-5 and E-8	At valves 1430A, 1406A, 1415A, 1437A, 1413A 1154A, 2430A, 2406A, 2415A, 2437A, 2413A and 2154A.
b	LR-M-20 Sheets 4 and 10, locations C-3 and C-4	At valves 1511A, 1510A, 1509A, 2511A, 2510A and 2509A.
c	LR-M-20 Sheets 5 and 11, locations F-3 and E-5	At valves 1608A, 1604A, 2608A, and 2604A.
2.3.3.19 Radwaste System		
a	LR-M-61 Sheet 1, locations G-5 and C-5	At valves 1081 and 1082.
b	LR-M-61 Sheet 4, locations G-5 and C-5	At valves 2081 and 2082.
2.3.3.21 Reactor Water Cleanup System		
a	LR-M-44 Sheet 1, Multiple locations	Several (12 locations) 1" capped lines.
2.3.3.22 Safety Related Service Water System		
a	LR-M-51 Sheet 8, location D-5	At valve 214B.
b	LR-M-51 Sheet 4, locations D-4 & D-5	At valve 1141B and ¾" GBB-123 line at valve HV-C 1F103B.
c	LR-M-13 Sheet 2, location G-5	At valve 2066A.
d	LR-M-12 Sheet 1, Multiple locations (35 locations)	Multiple 1" flush, drain and capped lines.
e	LR-M-11 Sheet 2, Multiple locations (16 locations)	Multiple ¾" flush, drain and capped lines.
f	LR-M-11 Sheet 3, Multiple locations (17 locations)	Multiple ¾" flush, drain and capped lines.
g	LR-M-11 Sheet 4, Multiple locations (32 locations)	Multiple ¾" and 1" flush, drain and capped lines.
h	LR-M-11 Sheet 5, Multiple locations (34 locations)	Multiple ¾" and 1" flush, drain and capped lines.

2.3.3.26 Water Treatment and Distribution (WTD) System		
a	LR-M-78 Sheet 1, locations D-5 thru D-7 and F-5 thru F-7	At valves 0001A, 0002A, 0003A, 0005A and 0001B, 0002B, 0003B, 0005B without classification break at SR-NSR interface.
b	LR-M-90 Sheet 1, Locations D-2, D-4, D-7, E-3, F-4, G-4	Several ¾" lines to vent and 1" lines to Drain without classification break at the valves where there is a SR-NSR interface.
c	LR-M-90 Sheet 2, Several locations	All capped ¾" lines to vent and 1" lines to Drain without classification break at the valves where there is a SR-NSR interface.

Clarify the scoping classification of the pipe lines identified in the above table as within the scope of license renewal based on the criteria in 10 CFR 54.4(a)(2).

Discussion: The applicant indicated that the request is clear. This DRAI will be sent as a formal RAI.

DRAI 2.3.3-02

In LRA Section 2.1.5.2, the applicant indicates that nonsafety-related SSCs attached to safety-related SSCs are in scope of license renewal for 10 CFR 54.4(a)(2) up to the first seismic anchor past the safety/nonsafety interface.

On the following license renewal boundary drawings, the staff could not locate seismic anchors on the 10 CFR 54.4(a)(2) nonsafety-related lines that are connected to safety-related lines:

Location Item	License Renewal Boundary Drawing Number & Location	10 CFR 54.4(a)(2) Pipe Line(s) or Identifier
2.3.3.1 Auxiliary Steam System		
a	LR-M-50 Sheet 1 and Sheet 2, location E-2	3" GBD-137 and 3" GBD-237 connected to 3" EBB-109 and 3" EBB-209, respectively.
b	LR-M-55 Sheet 1 and Sheet 2, location C-2	4" GBD-136 and 4" GBD-236 connected to 4" EBB-108 and 4" EBB-208, respectively.

2.3.3.2 Closed Cooling Water System		
a	LR-M-13 Sheet 1, locations F-5 & G-7	At valves HV108 & HV111, respectively.
b	LR-M-13 Sheet 2, locations F-5 & G-7	At valves HV208 & HV211, respectively.
2.3.3.4 Control Enclosure Ventilation System – Chilled Water Portion Only		
a	LR-M-78 Sheet 1, location F-1	1"JCD-112 line from Demineralized Water
b	LR-M-78 Sheet 2, location F-5	Downstream of valve 0003 from Demineralized Water
c	LR-M-90 Sheet 1, location E-8	2"-JCD-112 line from Demineralized Water
d	LR-M-90 Sheet 1, locations B-5 and B-8	Downstream of valves PSV051A, PSV051B, PSV050A and PSV050B, PSV049A and PSV049B, PSV048A and PSV048B
e	LR-M-90 Sheet 1, locations A-4 and A-6	Downstream of valves 0038A and 0038B
2.3.3.8 Emergency Diesel Generator System		
a	LR-M-20 Sheets 3 and 9, location D-2	Downstream of valves 1041 and 2041, respectively
b	LR-M-20 Sheets 3 and 9, locations D-2, D-3 and D-4	Four 4" HBD-365 (a)(2) lines connected to (a)(1) diesel oil storage tanks.
c	LR-M-20 Sheets 3 and 9, location F-6 and D-6	2" HBD-365 and 2" HBD-465 connected to the diesel engines and diesel-generator day tanks.
d	LR-M-20 Sheets 3 and 9, location D-4 and B-6	2" HBD-365 and 2" HBD-465 connected to the Diesel Oil Storage Tanks.
e	LR-M-20 Sheets 3 and 9, location D-4	4" HBD-365 connected to the Diesel Oil Storage Tanks 1AT527 and 2AT527.
f	LR-M-20 Sheets 3 and 9, locations D-2/3	4" HBD-365 connected to the Diesel Oil Storage Tanks 1CT527, 1BT527, 1DT527, 2CT527, 2BT527 and 2DT527.
g	LR-M-20 Sheets 3 and 9, location C-6	2" HBD-365 connected to the diesel engines and diesel-generator day tanks.

2.3.3.11 Fuel Pool Cooling and Cleanup System		
a	LR-M-47 Sheet 1, location E-7	2" HBC-133 (a)(2) line connected to 2" EBB-142 (a)(1) line.
b	LR-M-47 Sheet 2, location E-7	2" HBC-233 (a)(2) line connected to 2" EBB-242 (a)(1) line.
c	LR-M-53 Sheet 2, locations H-6 and H-5	2" JCD-101 connected to Skimmer Surge Tank 1AT208 and 1BT208.
d	LR-M-53 Sheet 4, locations H-6 and H-5	2" JCD-201 connected to Skimmer Surge Tank 2AT208 and 2BT208.
2.3.3.16 Primary Containment Ventilation System – Chilled Water Portion Only		
a	LR-M-87 Sheet 4, locations A-4 through C-4	At motor operated control valves HV120A, HV120B, HV121A, HV121B and also at HV124A, HV124B, HV125A, HV125B.
b	LR-M-87 Sheet 9, locations A-4 through C-4	At motor operated control valves HV220A, HV220B, HV221A, HV221B and also at HV224A, HV224B, HV225A, HV225B.
2.3.3.19 Radwaste System		
a	LR-M-61 Sheet 1, locations B-4 and F-4	Downstream of valves HV131 and HV111.
b	LR-M-51 Sheets 2 and 6, location G-3	Downstream of valves HV 1F040 and HV2F040, respectively.
c	LR-M-90 Sheet 1, locations A-4 and A-6	Downstream of valves 0038B and 0038A, respectively.
2.3.3.22 Safety Related Service Water System		
a	LR-M-11 Sheet 1, location G-1	4" JBD-279 line connected to the 10 CFR 54.4(a)(1) line from emergency service water pumps.
b	LR-M-11 Sheet 1, location G-8	4" JBD-179 line connected to the 10 CFR 54.4(a)(1) line from emergency service water pumps.

c	LR-M-11 Sheet 2, location A-8	8" JBD-116 10 CFR 54.4(a)(2) line connected to 8" HBC-158 10 CFR 54.4(a)(1) line.
d	LR-M-11 Sheet 2, location C-7	8" JBD-113 10 CFR 54.4(a)(2) line connected to 8" HBC-138 10 CFR 54.4(a)(1) line.
e	LR-M-11 Sheet 2, location D-2	6" JBD-50 line from control room chiller.
f	LR-M-11 Sheet 2, location E-2	6" JBD-51 line from control room chiller.
g	LR-M-11 Sheet 2, location F-2	6" JBD-50 line from control room chiller.
h	LR-M-11 Sheet 2, location G-2	6" JBD-51 line from control room chiller.
i	LR-M-11 Sheet 3, location B-2	10" JBD-139 10 CFR 54.4(a)(2) line connected to 10" HBC-152 10 CFR 54.4(a)(1) line.
j	LR-M-11 Sheet 3, location C-2	8" JBD-116 10 CFR 54.4(a)(2) line connected to 8" HBC-159 10 CFR 54.4(a)(1) line.
k	LR-M-11 Sheet 3, location D-2	10" JBD-113 10 CFR 54.4(a)(2) line connected to 10" HBC-166 10 CFR 54.4(a)(1) line.
l	LR-M-11 Sheet 3, location E-2	8" JBD-113 10 CFR 54.4(a)(2) line connected to 8" HBC-168 10 CFR 54.4(a)(1) line.
m	LR-M-11 Sheet 4, location A-5	10" JBD-213 10 CFR 54.4(a)(2) line connected to 10" HBC-266 10 CFR 54.4(a)(1) line.
n	LR-M-11 Sheet 4, location A-6	10" JBD-239 10 CFR 54.4(a)(2) line connected to 10" HBC-270 10 CFR 54.4(a)(1) line.
o	LR-M-11 Sheet 4, location C-7	8" JBD-216 10 CFR 54.4(a)(2) line connected to 8" HBC-258 10 CFR 54.4(a)(1) line.
p	LR-M-11 Sheet 4, location E-7	8" JBD-213 10 CFR 54.4(a)(2) line connected to 8" HBC-238 10 CFR 54.4(a)(1) line.
q	LR-M-11 Sheet 5, location C-2	8" JBD-216 10 CFR 54.4(a)(2) line connected to 8" HBC-259 10 CFR 54.4(a)(1) line.
r	LR-M-11 Sheet 5, location D-2	8" JBD-213 10 CFR 54.4(a)(2) line connected to 8" HBC-268 10 CFR 54.4(a)(1) line.
s	LR-M-12 Sheet 1, location B-3	3" HBD-82 83 line connected to drain sump.

t	LR-M-12 Sheet 1, location B-6	3" HBD-83 82 line connected to drain sump.
u	LR-M-13 Sheet 1, location F-5	3" JBD-148 10 CFR 54.4(a)(2) line connected to 3" HBB-135 10 CFR 54.4(a)(1) line.
v	LR-M-13 Sheet 1, location G-7	3" JBD-150 10 CFR 54.4(a)(2) line connected to 3" HBB-138 10 CFR 54.4(a)(1) line.
w	LR-M-13 Sheet 2, location F-5	3" JBD-248 10 CFR 54.4(a)(2) line connected to 3" HBB-235 10 CFR 54.4(a)(1) line.
x	LR-M-13 Sheet 2, location G-7	3" JBD-250 10 CFR 54.4(a)(2) line connected to 3" HBB-238 10 CFR 54.4(a)(1) line.
y	LR-M-51 Sheet 8, location E-3	¾" GBD-275 line downstream of valve HV2F080B.
z	LR-M-51 Sheet 2, location E-8	3/8" and ½" SS lines downstream of valve HV 1F080A.
aa	LR-M-51 Sheet 4, location A-5	2" JCD-113 line to RHR heat exchanger 1BE205 from M-18.
bb	LR-M-51 Sheet 4, location F-3	3/8" and ½" SS lines downstream of valve HV 1F080B.
cc	LR-M-51 Sheet 6, location G-2	4" GBC-217 line downstream of valve HV2F040.
2.3.3.26 Water Treatment and Distribution System		
a	LR-M-20 Sheet 4, location H-5 LR-M-20 Sheet 10, location H-5	At valves 1132A and 2132A, respectively.
b	LR-M-51 Sheet 2, location B-6 LR-M-51 Sheet 6, location B-6	At valves HV156A and HV256A, respectively.

Clarify the locations of the seismic anchors on the attached nonsafety-related piping for all of the systems in the above table and identify seismic anchors on attached nonsafety-related lines for all other systems not captured in the above table.

Discussion: The applicant indicated that this request had been addressed in a letter to the NRC dated January 27, 2012. The NRC staff reviewed the letter dated January 27, 2012 and confirmed that these items have been addressed. Therefore, this DRAI will not be sent as a formal RAI.

DRAI 2.3.3.8-1

License renewal boundary drawings LR-M-20 Sheets 8 and 14, location F-5, depict ejector casings that are within the scope of license renewal for 10 CFR 54.4(a)(1). However, the ejector casing is not listed in Table 2.3.3-8 as a component type subject to an aging management review (AMR).

Justify the exclusion of the ejector casing component type from LRA Table 2.3.3-8.

Discussion: The applicant indicated that the request is clear. This DRAI will be sent as a formal RAI.

DRAI 2.3.3.8-2

License renewal boundary drawings LR-M-20 Sheets 8 and 14, locations B-4 and D-4, depict turbo charger casings that are within the scope of license renewal for 10 CFR 54.4(a)(1). However, the turbo charger casing is not listed in Table 2.3.3-8 as a component type subject to an AMR.

Justify the exclusion of the turbo charger casing component type from LRA Table 2.3.3-8.

Discussion: The applicant indicated that the request is clear. This DRAI will be sent as a formal RAI.

DRAI 2.3.3.8-3

License renewal boundary drawings LR-M-20 Sheets 8 and 14, location F-3, depict exhaust silencer housings that are within the scope of license renewal for 10 CFR 54.4(a)(1). However, the exhaust silencer housing is not listed in Table 2.3.3-8 as a component type subject to an AMR.

Justify the exclusion of the exhaust silencer component type from LRA Table 2.3.3-8.

Discussion: The applicant indicated that the request is clear. This DRAI will be sent as a formal RAI.

DRAI 2.3.3.8-4

License renewal boundary drawings LR-M-20 Sheets 3 and 9, locations D-3 and D-7, depict flame arrestor housings that are within the scope of license renewal for 10 CFR 54.4(a)(1). However, the flame arrestor housing that is not listed in Table 2.3.3-8 as a component type subject to an AMR.

Justify the exclusion of the flame arrestor housing component type from LRA Table 2.3.3-8.

Discussion: The applicant indicated that the request is clear. This DRAI will be sent as a formal RAI.

DRAI 2.3.3.8-5

LRA Section 2.1.1 states that the in-scope portions of mechanical systems and structures are highlighted in color on the license renewal boundary drawings. For the Emergency Diesel Generator System, the applicant includes the diesel engines within the license renewal scoping boundary.

License renewal boundary drawings LR-M-20 Sheets 3 and 9, location F-5, depict diesel engines 1AG501 and 2AG501 as not being within the scope of license renewal. Although the applicant states in Note 7 that the in-scope fuel oil supply system boundary stops at the fuel injectors of the diesel generator due to the fuel injectors being excluded from aging management review, the license renewal boundary drawings appear to contradict the applicant's methodology for highlighting the in-scope components (the diesel engines) as described in LRA Section 2.1.1.

Justify why the diesel engines depicted on license renewal boundary drawings LR-M-20 Sheets 3 and 9 are indicated as not being within the scope of license renewal.

Discussion: The applicant indicated that the request is clear. This DRAI will be sent as a formal RAI.

DRAI 2.3.3.12-1

License renewal boundary drawings LR-M-10 Sheets 5 and 10, locations H-2 and H-4, depict the 6" JBD-107/207 and 6" JBD-132/232 lines as being within the scope of license renewal based on the criteria in 10 CFR 54.4(a)(2) with continuations to and from license renewal boundary drawings LR-M-10 Sheets 3 and 8. However, the continuations of these lines on license renewal boundary drawings, LR-M-10 Sheets 3 and 8, are depicted as not being within the scope of license renewal.

Clarify the correct scoping classification of these pipe lines.

Discussion: The applicant indicated that the request is clear. This DRAI will be sent as a formal RAI.

DRAI 2.3.3.13-1

On license renewal boundary drawing, LR-M-64 Sheet 1, location G-8, the continuation of the pipe line depicted within the scope of license renewal could not be found in any other license renewal boundary drawings.

Locate the continuation line for the above location. If the continuation line cannot be shown on license renewal boundary drawings, then provide additional information describing the extent of the scoping boundary and verify whether or not there are additional AMR component types between the continuation and the termination of the scoping boundary. If the scoping classification of a section of the piping changes over the continuation, provide additional information to clarify the change in scoping classification.

Discussion: The applicant indicated that the request is clear. This DRAI will be sent as a formal RAI.

DRAI 2.3.3.14-1

LRA Section 2.1 describes the applicant's scoping methodology, which specifies how systems or components were determined to be included in scope of license renewal. The staff confirms

the inclusion of all components subject to AMR by reviewing the results of the screening of components within the license renewal boundary.

On license renewal boundary drawing LR-M-59 Sheet 1, location C-6, the applicant depicts Note 5, which states "This piping is included in scope out to the seismic anchor credited for structural support of the safety-related piping located as shown. The nonsafety-related piping beyond this anchor location is not in scope." However, the 1" JCD-109 pipe continues in red, designating the piping as being within the scope of license renewal for 10 CFR 54.4(a)(2), from Note 5 to the end of the pipe and including the drawing continuation marker to drawing LR-M-59 Sheet 2, at location F-1. The continuation marker on Sheet 2 also shows the pipe still in scope for 10 CFR 54.4(a)(2) and has another Note 5, the same as Sheet 1, where the transition is actually made from red to black to indicate the 1" JCD-109 pipe continuation changed to not being in scope for license renewal. For LGS, Unit 2, LRA drawing LR-M-59 Sheet 3, location C-6, the 1" JCD-209 pipe has the same Note 5 and there is an immediate transition from red to black, so the remainder of the pipe up to and including the continuation marker is no longer in scope as the Note 5 indicates. There also is no duplicate Note 5 on Sheet 4.

Clarify why the 1" JCD-109 pipe scope does not agree with Note 5 on LRA drawing LR-M-59 Sheet 1. Also clarify why there are differences in scoping between the 1" JCD-109 pipeline on Sheets 1 and 2 and the 1" JCD-209 pipeline on Sheets 3 and 4.

Discussion: The applicant indicated that the request is clear. This DRAI will be sent as a formal RAI.

DRAI 2.3.3.14-02

License renewal boundary drawing LR-M-59 Sheet 3, location H-6, depicts a line not highlighted within the scope of license renewal. However, the line is connected to a continuation marker from drawing LR-M-42 Sheet 3, location A-3, which depicts the continuation marker to be highlighted green and in scope for 10 CFR 54.4(a)(1).

Clarify the scoping classification of the pipe line.

Discussion: The applicant indicated that the request is clear. This DRAI will be sent as a formal RAI.

DRAI 2.3.3.17-01

License renewal boundary drawings LR-M-26 Sheets 1 and 7, location C-2, and LR-M-26 Sheet 4, location B-7, depict sample chambers in Detail K that are within the scope of license renewal for 10 CFR 54.4(a)(2), but are not listed in Table 2.3.3-17 as a component type subject to an AMR.

Justify the exclusion of the sample chamber component type from LRA Table 2.3.3-17

Discussion: The applicant indicated that the request is clear. This DRAI will be sent as a formal RAI.

DRAI 2.3.3.17-02

License renewal boundary drawing LR-M-26 Sheet 5, location E-3, depicts filter and detector housings in Detail G that are within the scope of license renewal for 10 CFR 54.4(a)(1), but are not listed in Table 2.3.3-17 as a component type subject to an AMR.

Justify the exclusion of the filter and detector housing component types from LRA Table 2.3.3-17.

Discussion: The applicant indicated that the request is clear. This DRAI will be sent as a formal RAI.

DRAI 2.3.3.18-01

License renewal boundary drawings LR-M-23 Sheets 4 and 7, location H-4, depict a continuation line from the feedwater to reactor 10 CFR 54.4(a)(2) pipelines respectively to license renewal boundary drawings LR-M-06 Sheets 3 and 6, location G-8, where the pipeline continuations are shown excluded from scope of license renewal.

Clarify the scoping classification of these pipe lines.

Discussion: The applicant indicated that the request is clear. This DRAI will be sent as a formal RAI.

DRAI 2.3.3.22-01

License renewal boundary drawing LR-M-13 Sheet 2, locations D-2 and E-7, depicts 1½" JBD-419 lines as being within the scope of license renewal based on the criteria in 10 CFR 54.4(a)(2), with continuations to license renewal boundary drawing LR-M-23, Sheet 7. However, the continuations of these lines on license renewal boundary drawing LR-M-23, Sheet 7 are shown as not within the scope of license renewal.

Clarify the scoping classification of these pipe lines.

Discussion: The applicant indicated that the request is clear. This DRAI will be sent as a formal RAI.

DRAI 2.3.3.22-02

License renewal boundary drawing LR-M-13, Sheet 1, locations D-2 and D-4, shows the 1½" JBD-319 lines to be within the scope of license renewal for 10 CFR 54.4(a)(2), with continuations to and from the license renewal boundary drawing LR-M-23, Sheet 4. However the continuations of these lines on drawing LR-M-23, Sheet 4 are shown as not within the scope of license renewal.

Clarify the scoping classification of these pipe lines.

Discussion: The applicant indicated that the request is clear. This DRAI will be sent as a formal RAI.

DRAI 2.3.4-01

For the license renewal boundary drawing locations identified in the table below, the staff could not determine the basis for the change in scoping criteria from 10 CFR 54.4 (a)(1) to 10 CFR 54.4 (a)(2).

Nonsafety-related/Safety-Related Interface Item	License Renewal Boundary Drawing Number & Location	Explanation of Issue
2.3.4.2 Condensate System		
a	LR-M-51 Sheet 1, Multiple locations	At all test connections.
b	LR-M-52 Sheet 1, Multiple locations	At valves 1F041A, 1F041B, 1021B, 1075A, 1075B, 1076A and 1076B.
c	LR-M-52 Sheet 2, locations F-3 and G-3	¾" SBD-152 drain out of pumps 1AP256 and 1BP256.
d	LR-M-52 Sheet 3, locations E-7 and F-7	At valves 2F041A and 2F041B.
e	LR-M-52 Sheet 4, Multiple locations	At valves 2004, 2023A, 2023B, 2027B, 2027C, 2027D, 2032D, 2066, 2069, 2075A, 2075B, 2076, 2082, 2083, 2084, 2085, 2086, 2087 and 2088.
2.3.4.6 Main Steam System		
a	LR-M-01 Sheet 1, location C-6	At valve 1030.
b	LR-M-01 Sheet 3, location A-6	At valve 2030.
c	LR-M-41 Sheet 1, location A-6	At valves 1038 and 1051.
d	LR-M-41 Sheet 2, locations E-4, D-3, D-1 and G-8	At valves 1066A, 1067A, 1068A, 1069A, 1070A, 1071A, 1072A, 1073A, 1037, 1040, and 1034E.
e	LR-M-41 Sheet 4, locations A-6 & B-5 thru D-5	At valves 2038, 2F082B, 2063 and 2F083A.
f	LR-M-41 Sheet 5, locations E-4, D-3, D-1 and G-8	At valves, 2037, 2070, 2034E.

g	LR-M-49 Sheet 1, Multiple locations	At valves 1F053, 1F082, 1F083, 1F085, 1004, 1005, 1020, 1026, 1042, 1043, 1048A, 1048B, 1048B, 1048D, 1049B, 1049B, 1049B, 1049D, and 1055.
h	LR-M-50 Sheet 1, location G-6	At valve 1043.
i	LR-M-50 Sheet 2, location H-6	At valve 2043.
j	LR-M-55 Sheet 1, Multiple locations	At valves 1F013, 1F015, 1F044, 1F056, 1F065, 1F090, 1F091, 1F092, 1030, 1034, 1036, 1037, 1040, 1041, 1050, 1053, 1054, 1056, 1057, 1066, 1067, 1070A, 1070B, 1070C, 1070D, 1071A, 1071B, 1071C, and 1071D, 1045.

Clarify the scoping classification of the 10 CFR 54.4(a)(2) pipe lines identified in the above table.

Discussion: The applicant indicated that the request is clear. This DRAI will be sent as a formal RAI.

DRAI 2.3.4-02

In LRA Section 2.1.5.2, the applicant indicates that nonsafety-related SSCs attached to safety-related SSCs are in scope of license renewal for 10 CFR 54.4(a)(2) up to the first seismic anchor past the safety/nonsafety interface.

On the following license renewal boundary drawings, the staff could not locate seismic anchors on the 10 CFR 54.4(a)(2) nonsafety-related lines that are connected to safety-related lines:

Location Item	License Renewal Boundary Drawing Number & Location	10 CFR 54.4(a)(2) Pipe Line(s) or Identifier
2.3.4.2 Condensate System		
a	LR-M-49 Sheet 1 and Sheet 2, location B-4	2" HBD 339 and 2" HBD 439 downstream of valves 1F064 and 2F064.
b	LR-M-51 Sheet 1 and Sheet 5, location H-6	4" HCD 108 and 4" HCD 208 downstream of valves 1F098 and 2F098.
c	LR-M-52 Sheet 1 and Sheet 3, location H-3	2" HBD 394, downstream of valve 1F029B and 2" HBD 494, downstream of valve 2F029B

d	LR-M-52 Sheet 1 and Sheet 3, location G-4	2" HBD 394, downstream of valve 1F029A and 2" HBD 494, downstream of valve 2F029A
e	LR-M-52 Sheet 2 and Sheet 4, location E-7	6" HBD 395 and 6" HBD 495 upstream of valves 1034 and 2034.
f	LR-M-55 Sheet 2, location G-4	10" HCB-208 downstream of valve HV 2F0111.
g	LR-M-55 Sheet 1 and Sheet 2, location B-5	2" HBD 338 and 2" HBD 438 upstream of valves 1F077 and 2F077.
2.3.4.6 Main Steam System		
a	LR-M-01 Sheet 1, locations C-8, G-8 and H-8	Downstream of valves HV108, HV109, HV150, and HV111.
b	LR-M-01 Sheet 1, locations C-8, D-8, D-6 and H-7	Downstream of valves HV208, HV209, HV250, and HV211.
c	LR-M-41 Sheets 2 and 4, location B-4	Downstream of valves 1F085 and 2F085.

Clarify the locations of the seismic anchors on the attached nonsafety-related piping for all of the systems in the above table. The staff also requests the applicant to identify seismic anchors on attached nonsafety-related lines for all other systems not captured in the above table.

Discussion: The applicant indicated that this request had been addressed in a letter to the NRC dated January 27, 2012. The NRC staff reviewed the letter dated January 27, 2012 and confirmed that these items have been addressed. Therefore, this DRAI will not be sent as a formal RAI.

DRAI 2.3.4.3-01

License renewal boundary drawings LR-M-07 Sheets 1 and 3, location H-2, depict air inlets with screens that are within the scope of license renewal for 10 CFR 54.4(a)(2), but are not listed in Table 2.3.4-3 as a component type subject to an AMR.

Justify the exclusion of the air inlet with screen component type from LRA Table 2.3.4-3.

Discussion: The applicant indicated that the request is clear. This DRAI will be sent as a formal RAI.

DRAI 2.3.4.6-01

On license renewal boundary drawing, LR-M-05 Sheet 1, locations G-3, G-4 and G-6, the continuation of the 1 ½" "Bearing Drain to Oily Waste" pipe from the condenser could not be found on the following license renewal boundary drawings because the drawings were not included in the license renewal boundary drawings package:

- M-19 Sheet 3
- M-19 Sheet

Provide the license renewal boundary for the 1 ½" "Bearing Drain to Oily Waste" pipe for the license renewal boundary drawings described above. If the continuation line cannot be shown on these license renewal boundary drawings, then provide additional information describing the extent of the scoping boundary and verify whether or not there are additional AMR component types between the continuation and the termination of the scoping boundary. If the scoping classification of a section of the piping changes over the continuation, provide additional information to clarify the change in scoping classification.

Discussion: The applicant indicated that the request is clear. This DRAI will be sent as a formal RAI.

DRAI 2.3.4.7-01

Drawing LR-M-07 Sheet 2, location F-6, shows in scope pipeline 1" HBD-359, however the continuation on this same drawing at location B-4 shows this pipeline as not in scope.

Clarify the scoping boundary of this pipe section.

Discussion: The applicant indicated that the request is clear. This DRAI will be sent as a formal RAI.

DRAI 2.3.4.7-02

License renewal boundary drawings LR-M-07 Sheets 2 and 4, location E-7, depict drain pipelines 1" HBD-359, and 1" HBD-459 within the scope of license renewal for 10 CFR 54.4(a)(2). However, license renewal boundary drawings LR-M-06 Sheets 2 and 5, location D-8, depict the continuation lines as not being within the scope of license renewal.

Clarify the scoping boundaries for the pipe lines.

Discussion: The applicant indicated that the request is clear. This DRAI will be sent as a formal RAI.

LICENSEE: Exelon Generation Company, LLC

FACILITY: Limerick Generating Station

SUBJECT: SUMMARY OF TELEPHONE CONFERENCE CALL HELD ON JANUARY 18, 2012, BETWEEN THE U.S. NUCLEAR REGULATORY COMMISSION AND EXELON GENERATION COMPANY, LLC, CONCERNING REQUESTS FOR ADDITIONAL INFORMATION PERTAINING TO THE LIMERICK GENERATING STATION, LICENSE RENEWAL APPLICATION (TAC. NOS. ME6555 AND ME6556)

The U.S. Nuclear Regulatory Commission (NRC or the staff) and representatives of Exelon Generation Company, LLC held a telephone conference call on January 18, 2012, to discuss and clarify the staff's requests for additional information (RAIs) concerning the Limerick Generating Station, license renewal application. The telephone conference call was useful in clarifying the intent of the staff's RAIs.

Enclosure 1 provides a listing of the participants and Enclosure 2 contains a listing of the RAIs discussed with the applicant, including a brief description on the status of the items.

The applicant had an opportunity to comment on this summary.

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

Docket Nos. 50-352 and 50-353

Enclosures:

1. List of Participants
2. List of Requests for Additional Information

cc w/encls: Listserv

LICENSEE: Exelon Generation Company, LLC

FACILITY: Limerick Generating Station

SUBJECT: SUMMARY OF TELEPHONE CONFERENCE CALL HELD ON JANUARY 18, 2012, BETWEEN THE U.S. NUCLEAR REGULATORY COMMISSION AND EXELON GENERATION COMPANY, LLC, CONCERNING REQUESTS FOR ADDITIONAL INFORMATION PERTAINING TO THE LIMERICK GENERATING STATION, LICENSE RENEWAL APPLICATION (TAC. NOS. ME6555 AND ME6556)

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The applicant had an opportunity to comment on this summary.

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

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TELEPHONE CONFERENCE CALL
LIMERICK GENERATING STATION
LICENSE RENEWAL APPLICATION

LIST OF PARTICIPANTS
January 18, 2011

PARTICIPANTS

Robert Kuntz
Naeem Iqbal
Gene Kelly
Christopher Wilson
Albert Fulvio
Ron Hess
Dave Clohecy

AFFILIATIONS

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

DRAI 2.3.3.9-1

The staff notes that license renewal boundary drawing LR-M-22, Sheet 5, at location F3, shows the cable spreading room’s fire walls and associated components including fire doors, fire dampers, and penetration seals as out of scope (i.e., not colored in green). The staff requests that the applicant verify whether the cable spreading rooms fire walls and associated components are in the scope of license renewal in accordance with 10 CFR 54.4(a) and whether they are subject to an aging management review (AMR) in accordance with 10 CFR 54.21(a)(1). The staff requested that, if these fire walls and associated components are excluded from the scope of license renewal and are not subject to an AMR, the applicant provide justification for the exclusion.

Discussion: The applicant indicated that the request is clear. This DRAI will be sent as a formal RAI.

DRAI 2.3.3.9-2

The following license renewal application (LRA) boundary drawings shows the following fire protection systems/components as out of scope (i.e., not colored in green):

<u>LRA Drawing</u>	<u>Systems/Components</u>	<u>Location</u>
LR-M-22, Sheet 2	Fire water suppression systems associated with Safeguard Transformer (0AX103), Auxiliary Transformer (10X102), and Spare Transformer (10X101)	H3
LR-M-22, Sheet 2	Fire water suppression systems associated with Unit 1 Main Transformers (1AX101), (1BX101), and (1CX101)	H4
LR-M-22, Sheet 4	Fire water suppression systems associated with Safeguard Transformer (0BX103), and Auxiliary Transformer (20X102)	H3
LR-M-22, Sheet 4	Fire water suppression systems associated with Unit 2 Main Transformers (2AX101), (2BX101), and (2CX101)	H3

The staff requests that the applicant verify whether the fire protection systems/components listed above are in the scope of license renewal in accordance with 10 CFR 54.4(a) and whether they are subject to an AMR in accordance with 10 CFR 54.21(a)(1). If they are excluded from the scope of license renewal and are not subject to an AMR, the staff requests that the applicant provide justification for the exclusion.

Discussion: The applicant clarified on the conference call that the drawings did not indicate structures within the scope of license renewal and that items discussed in the RAI are included in the scope of license renewal. The staff verified in the drawings that the drawings specifically noted that structures were not colored to annotate inclusion within the scope of license renewal and also verified the description in the LRA was adequate. Therefore, the staff will not issue this DRAI because sufficient information exist on the docket to satisfy the staff’s concern.

DRAI 2.3.3.9-3

The source of water for the fire protection system at Limerick Generating Station, Units 1 and 2 is a pair of cooling tower basins, each of which has a capacity of 7,200,000 gallons. Section 9.5.1.6.7, Supplement No. 2, NUREG-0991, "Safety Evaluation Report related to the operation of Limerick Generating Station, Units 1 and 2," dated October 1984, states that suction lines to the fire pump are arranged so that if one of the cooling towers becomes unavailable, the suction line can be switched to the functional tower.

The staff requests that the applicant verify whether the fire protection water supply components including suction lines to the fire pump and valves are in the scope of license renewal in accordance with 10 CFR 54.4(a) and subject to an AMR in accordance with 10 CFR 54.21(a)(1). If they are excluded from the scope of license renewal and not subject to an AMR, the staff requests that the applicant provide justification for the exclusion.

Discussion: The applicant clarified on the conference call that the drawings LR-M-9, Sheets 3, 8, and 9 highlight fire protection water supply components including suction lines to the fire pump and valves. The staff verified that the fire protection water supply components including suction lines to the fire pump and valves in question are highlighted and colored in green on the drawings LR-M-9, Sheets 3, 8, and 9. Therefore, the staff will not issue this DRAI because sufficient information exists on the docket to satisfy the staff's concern.

DRAI 2.3.3.9-4

LRA Tables 2.3.3-9 and 3.3.2-9 of the LRA do not include the following fire protection components:

- fire hose stations, fire hose connections, and hose racks
- fire protection water curtain systems in the reactor enclosures and hatchways
- floor drains for fire water
- passive components in fire protection water and foam solution storage tank heat exchangers
- fire dampers
- fire retardant coating (fireproofing material) for structural steel members
- passive components in diesel driven fire pump engine
- passive components in lighting plant protection system (NFPA 78, Lighting Protection Code)

The staff requests that the applicant verify whether the fire protection components listed above are in the scope of license renewal in accordance with 10 CFR 54.4(a) and whether they are subject to an AMR in accordance with 10 CFR 54.21(a)(1). If they are excluded from the scope of license renewal and are not subject to an AMR, the staff requests that the applicant provide justification for the exclusion.

Discussion: The applicant indicated that the request is clear. This DRAI will be sent as a formal RAI. This RAI will be renumbered and will be issued as RAI 2.3.3.9-2 to account for the deletion of DRAI 2.3.3.9-2 and DRAI 2.3.3.9-3 as discussed above.

DRAI 2.3.3.9-5

Section 2.4, "Scoping and Screening Results: Structures," of the LRA provides the scoping and screening results of various structures within the scope of license renewal and subject to an AMR. Further, Section 2.4 states that the fire barriers are evaluated separately with the Fire Protection System, LRA Section 2.3.3.9. LRA Table 2.3.3.9, includes fire barriers (doors), fire barriers (fire rated enclosures), fire barriers (for steel components), fire barriers (penetration seals), fire barriers (walls and slabs), that are subject to an AMR. The staff requests that the applicant provide a summary of the list of buildings or structures where fire barriers are credited, and the specific types of barriers at these locations in the plant's fire protection program.

Discussion: The applicant indicated that the request is clear. This DRAI will be sent as a formal RAI. This RAI will be renumbered and will be issued as RAI 2.3.3.9-3 to account for the deletion of DRAI 2.3.3.9-2 and DRAI 2.3.3.9-3 as discussed above.

SUBJECT: Summary of Telephone Conference Call conducted on December 13, 2011

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