

## LimerickNPEm Resource

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**From:** Kuntz, Robert  
**Sent:** Wednesday, June 20, 2012 10:54 AM  
**To:** 'Christopher.Wilson2@exeloncorp.com'  
**Cc:** Anthony Z. Roisman; gfettus@nrdc.org; Smith, Maxwell; LimerickHearingFile Resource  
**Subject:** RE: DRAFT Request for Additional Information RE: Limerick Generating Station LRA  
**Attachments:** DRAFT RAI RE LGS LRA OCCW followup.docx

Chris,

Attached is a DRAFT Request for Information related to the license renewal application for Limerick Generating Station. If Exelon would like clarification on the attached let me know and I will set up a teleconference.

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**Hearing Identifier:** Limerick\_LR\_NonPublic  
**Email Number:** 1213

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**Subject:** RE: DRAFT Request for Additional Information RE: Limerick Generating Station  
LRA  
**Sent Date:** 6/20/2012 10:53:41 AM  
**Received Date:** 6/20/2012 10:53:57 AM  
**From:** Kuntz, Robert

**Created By:** Robert.Kuntz@nrc.gov

**Recipients:**

"Anthony Z. Roisman" <aroisman@nationallegalscholars.com>

Tracking Status: None

"gfettus@nrdc.org" <gfettus@nrdc.org>

Tracking Status: None

"Smith, Maxwell" <Maxwell.Smith@nrc.gov>

Tracking Status: None

"LimerickHearingFile Resource" <LimerickHearingFile.Resource@nrc.gov>

Tracking Status: None

"Christopher.Wilson2@exeloncorp.com" <Christopher.Wilson2@exeloncorp.com>

Tracking Status: None

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DRAFT RAI RE LGS LRA OCCW followup.docx		29129

**Options**

**Priority:** Standard

**Return Notification:** No

**Reply Requested:** No

**Sensitivity:** Normal

**Expiration Date:**

**Recipients Received:**

LIMERICK GENERATING STATION  
LICENSE RENEWAL APPLICATION  
DRAFT REQUESTS FOR ADDITIONAL INFORMATION

**DRAI B.2.1.12-3**

Background

Commitment No. 12 and LRA Section A.2.1.12 were revised as a result of the responses to RAI B.2.1.12-1 and RAI B.2.1.12-2. The revision includes a commitment to, “[p]erform periodic inspections for loss of material in the Nonsafety-Related Service Water System at a minimum of five locations on each unit once every refueling cycle.” The response to RAI B.2.1.12-1 also provided the basis for why the opportunistic inspections of buried service water piping would be sufficient to provide adequate managing of the aging of the internal surfaces of the piping.

Issue

The staff agrees that (a) the opportunistic inspection of the buried piping was clarified to at least occur during the replacement of the residual heat removal service water (RHRSW) piping in the pipe tunnel between 2012 and 2015, (b) the detailed inspections of the piping removed during the replacement will provide supplemental information to assess the condition of the buried piping, and (c) degradation of the piping in aboveground portions of the system will be consistent with the buried piping given similar operating conditions. However, given the timing of the only certain inspection of the buried service water piping, the staff does not agree that there is a sufficient basis to establish a reasonable assurance that the buried service water piping will perform its current licensing basis function(s) throughout the period of extended operation. Nevertheless, the staff believes that the five inspections per unit per refueling outage interval in the nonsafety-related portions of the service water system, given similar operating conditions, would provide sufficient timely data to understand the condition of the internal surfaces of the buried piping.

The Updated Final Safety Analysis Report (UFSAR) supplement, as amended, does not provide a link between the inspections of the nonsafety-related portions of the service water system and the conditions of the buried piping. Lacking this link, the staff does not believe that the UFSAR supplement provides a sufficient summary description of the activities for managing the aging of the buried service water piping as required by 10 CFR 54.21(d).

Request

- (a) Revise LRA Section A.2.1.12 to establish that the nonsafety-related piping inspections are necessary to provide a sufficient understanding of the buried service water piping conditions throughout the period of extended operation.
- (b) State how inspection locations will be selected to ensure that conditions are similar between the nonsafety-related piping inspections and buried service water piping (e.g., flow, temperature) such as they impact MIC.

Alternatively,

- (c) Revise Commitment No. 12 and LRA Section A.2.1.12 to conduct internal visual and/or volumetric inspections of other portions of the service water system that would be sufficient to provide timely data to understand the condition of the internal surfaces of the buried piping throughout the period of extended operation.