



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

July 10, 2012

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

SUBJECT: REQUESTS FOR ADDITIONAL INFORMATION FOR THE REVIEW OF THE  
LIMERICK GENERATING STATION, UNITS 1 AND 2, LICENSE RENEWAL  
APPLICATION (TAC NOS. ME6555 AND ME6556)

Dear Mr. Gallagher:

By letter dated June 22, 2011, Exelon Generation Company, LLC submitted an application pursuant to Title 10 of the *Code of Federal Regulations* Part 54, to renew the operating licenses for Limerick Generating Station, Units 1 and 2, for review by the U.S. Nuclear Regulatory Commission (NRC or the staff). The staff is reviewing the information contained in the license renewal application and has identified, in the enclosure, areas where additional information is needed to complete the review.

These requests for additional information were discussed with Christopher Wilson, and a mutually agreeable date for the response is within 30 days from the date of this letter. 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 horizontal line.

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

Docket Nos. 50-352 and 50-353

Enclosure:  
Requests for Additional Information

cc w/encl: Listserv

LIMERICK GENERATING STATION  
LICENSE RENEWAL APPLICATION  
REQUESTS FOR ADDITIONAL INFORMATION

**DRAFT RAI 4.1-3**

Background

Title 10 of the *Code of Federal Regulations* (CFR) 54.21(c)(2) states that a list must be provided of plant-specific exemptions granted pursuant to 10 CFR 50.12 and in effect that are based on time-limited aging analyses as defined in 10 CFR 54.3. The applicant shall provide an evaluation that justifies the continuation of these exemptions for the period of extended operation.

Issue

The staff noted that the 32 effective full power year (EFPY) pressure-temperature (P-T) limits were granted for Limerick Generating Station (LGS), Unit 1, for Cycle 9 in License Amendment No. 145 dated September 15, 2000. The 32 EFPY P-T limits were granted for LGS, Unit 2, for Cycle 7 in License Amendment No. 111 dated March 21, 2001. The staff noted that the use of the P-T limits in Tech Spec Figure 3.4.6.1-1, for both units to 32 EFPY was granted on January 2, 2003 for LGS, Unit 1, in License Amendment No. 163 as well as for LGS, Unit 2, in License Amendment No. 125.

License renewal application (LRA) Table 4.1-3 indicates that exemptions associated with Code Cases N-640 and N-588 will not be needed during the period of extended operation because 10 CFR Part 50, Appendix G requires new P-T limits to be developed for higher fluence values that are to be approved by the NRC prior to exceeding 32 EFPY, which is predicted to occur before the period of extended operation.

However, an evaluation to justify the continuation of the exemptions for the period of extended operation has not been provided, as required by 10 CFR 54.21(c)(2), if for any reason the current approved P-T limits would still be in effect during the period of extended operation.

Request

- 1) Clarify the dates that the exemptions associated with Code Cases N-640 and N-588 for LGS, Units 1 and 2 in LRA Table 4.1-3 were granted. Revise LRA Section 4.1, if applicable.
- 2) Provide an evaluation that justified the continuation of those exemptions associated with Code Cases N-640 and N-588 in the event that the current approved P-T limits would be in effect during the period of extended operation and revise LRA Sections 4.1 and A.4.1, if applicable.

ENCLOSURE

### **RAI B.1.4-3**

#### Background

The response to RAI B1.4-2, provided by letter dated June 19, 2012, stated that the enhancements to the Operating Experience program and Corrective Action Program (CAP) will be implemented within two years following the receipt of the renewed operating license. The staff has reviewed the proposed time frame and its basis for the implementation of the programs, as described in the June 19, 2012, response to RAI B1.4-2 and determined it to be acceptable.

#### Issue

The proposed updated final safety analysis report (UFSAR) supplement states that the "enhancements will be implemented prior to the period of extended operation," which is not as detailed as the proposed dates of implementation in the response to RAI B.1.4-2, of two years following the receipt of the renewed operating license. Further clarification is required to preclude implementing the program as currently described in the proposed UFSAR supplement as opposed to implementing the program consistent with the time frame contained in the response to RAI B1.4-2.

#### Request

Revise the UFSAR supplement regarding the time frame for the implementation of enhancements to the operating experience and CAP, in order to be consistent with the information contained in the response to RAI B1.4-2, "two years following the receipt of the renewed operating license."

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Sincerely,  
*/RA/*

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

Docket Nos. 50-352 and 50-353

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Requests for Additional Information

cc w/encl: Listserv

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Letter to M. Gallagher from R. Kuntz dated July 10, 2012

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