

## LimerickNPEm Resource

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**From:** Kuntz, Robert  
**Sent:** Friday, June 29, 2012 2:45 PM  
**To:** 'Christopher.Wilson2@exeloncorp.com'; john.hufnagel@exeloncorp.com  
**Cc:** 'Anthony Z. Roisman'; 'gfettus@nrdc.org'; Smith, Maxwell; LimerickHearingFile Resource  
**Subject:** DRAFT Request for Additional Information RE: Limerick Generating Station LRA  
**Attachments:** DRAFT PT limit exemptions and OpE follow-up2 RAI.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.

Robert Kuntz  
Sr. Project Manager  
NRR/ADRO/DLR/RPB1  
(301) 415-3733  
[robert.kuntz@nrc.gov](mailto:robert.kuntz@nrc.gov)

**Hearing Identifier:** Limerick\_LR\_NonPublic  
**Email Number:** 1264

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**Subject:** DRAFT Request for Additional Information RE: Limerick Generating Station LRA  
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**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  
"john.hufnagel@exeloncorp.com" <john.hufnagel@exeloncorp.com>  
Tracking Status: None

**Post Office:** HQCLSTR01.nrc.gov

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DRAFT PT limit exemptions and OpE follow-up2 RAI.docx		29606

**Options**

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LIMERICK GENERATING STATION  
LICENSE RENEWAL APPLICATION  
DRAFT REQUESTS FOR ADDITIONAL INFORMATION

**DRAI 4.1-3**

Background

10 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 EFPY (Effective Full Power Year) 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.

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 10CFR 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. 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.

**DRAI 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 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 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 if 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.”