



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

October 10, 2012

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

SUBJECT: REQUEST 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 (applicant) 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). On July 31, 2012, the staff issued the Safety Evaluation Report (SER) with Open Items related to this application, which includes Open Item 3.0.5-1 regarding the applicant's proposed implementation schedule for the operating experience program enhancements. In a letter dated September 12, 2012, the applicant responded to the open item.

The staff is reviewing the information contained in the letter of September 12, 2012, and has identified that further information is needed to complete its review. The specific question is in the enclosed request for additional information (RAI).

The RAI was 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- 415-1457 or by e-mail at [Patrick.Milano@nrc.gov](mailto:Patrick.Milano@nrc.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Patrick D. Milano".

Patrick D. Milano, Senior Project Manager  
Projects Branch 1  
Division of License Renewal  
Office of Nuclear Reactor Regulation

Docket Nos. 50-352 and 50-353

Enclosure:  
Request for Additional Information

cc w/encl: Listserv

LIMERICK GENERATING STATION, UNITS 1 AND 2  
LICENSE RENEWAL APPLICATION  
REQUEST FOR ADDITIONAL INFORMATION

Section B.1.4, "Operating Experience"

**RAI B.1.4-4**

Background

On July 10, 2012, the U.S. Nuclear Regulatory Commission (NRC) staff issued request for additional information (RAI) B.1.4-3 requesting changes to the updated final safety analysis report (UFSAR) supplement to reflect the time frame for implementation of the operating experience program enhancements described in Exelon Generation Company, LLC (the applicant)'s response to RAI B.1.4-2. In the background discussion of this RAI, the staff stated that it had "reviewed the proposed time frame and its basis for the implementation of the programs, as described in the June 19, 2012, response to RAI B.1.4-2 and determined it to be acceptable." However, subsequent to the issuance of RAI B.1.4-3, on July 31, 2012, the staff issued the Safety Evaluation Report with Open Items Related to the License Renewal of Limerick Generating Station, Units 1 and 2, which includes Open Item 3.0.5-1 regarding the applicant's proposed implementation schedule. By letter dated September 12, 2012, the applicant responded to this open item.

Issue

As proposed, the UFSAR supplement description of the operating experience review activities, as contained in license renewal application Section A.1.6, "Operating Experience," allows for a two-year period after license renewal before operating experience related to aging is considered in maintaining the aging management programs. This consideration of operating experience begins at a later date rather than immediately upon receipt of a renewed operating license. As such, the applicant's response does not provide reasonable assurance that the applicant will consider relevant plant-specific and industry operating experience and incorporate it into the aging management activities on an ongoing basis.

Request

Revise the UFSAR supplement to clearly address how plant-specific and industry operating experience will be considered on an ongoing basis prior to full implementation of operating experience program enhancements, or justify why no revisions to the UFSAR supplement are necessary.

ENCLOSURE

October 10, 2012

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Exelon Generation Company, LLC  
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Kennett Square, PA 19348

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Sincerely,  
*/RA/*  
Patrick D. Milano, Senior Project Manager  
Projects Branch 1  
Division of License Renewal  
Office of Nuclear Reactor Regulation

Docket Nos. 50-352 and 50-353

Enclosure:  
Request for Additional Information

cc w/encl: Listserv

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\*via email

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<b>DATE</b>	10/10/2012	10/10/2012	10/10/2012	10/10/2012

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Letter to M. Gallagher from P. Milano dated October 10, 2012

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