

LimerickNPEm Resource

From: Milano, Patrick
Sent: Wednesday, October 03, 2012 3:30 PM
To: Christopher.Wilson2@exeloncorp.com; john.hufnagel@exeloncorp.com
Cc: LimerickHearingFile Resource; gfettus@nrdc.org; Smith, Maxwell; Homiack, Matthew; aroisman@nationallegalscholars.com
Subject: DRAFT Request for Additional Information re: Limerick Generating Station LRA
Attachments: Limerick RAI B 1 4-4 - Operating Experience OI.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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From: Milano, Patrick

Created By: Patrick.Milano@nrc.gov

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Limerick RAI B 1 4-4 - Operating Experience OI.docx		29122

Options

Priority: Standard

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Recipients Received:

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

Section B.1.4, "Operating Experience"

RAI B.1.4-4

Background

On July 10, 2012, the 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 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.