



SECY-00-045  
RIS 2000-17

November 30, 2012

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, DC 20555-0001

Limerick Generating Station, Units 1 and 2  
Facility Operating License Nos. NPF-39 and NPF-85  
NRC Docket Nos. 50-352 and 50-353

Subject: Annual Commitment Change Summary Report

This report summarizes Limerick changes to NRC commitments that meet the threshold for reporting for the period from July 1, 2011 to June 30, 2012. Changes to these commitments are performed using procedure LS-AA-110, Commitment Management, which employs the guidance provided in NEI 99-04, Guidelines for Managing NRC Commitment Changes. NEI 99-04 was approved by the NRC for licensee use by SECY-00-045, Acceptance of NEI 99-04, 'Guidelines for Managing NRC Commitments'. Licensees were informed that NEI 99-04 was an acceptable process for control of regulatory commitments by the issuance of RIS 2000-17, Managing Regulatory Commitments made by Power Reactor Licensees to the NRC Staff, on September 21, 2000.

There are no new regulatory commitments contained in this letter.

If you have any questions or require additional information, please do not hesitate to contact us.

Sincerely,

Original signed by

Thomas J. Dougherty  
Vice President – Limerick  
Exelon Generation Company, LLC

Attachment: List of changes to NRC commitments

cc: Administrator Region I, USNRC  
USNRC Senior Resident Inspector, LGS

Attachment - List of changes to NRC commitments

November 30, 2012

Page 1 of 2

LS-AA-110 Commitment Management, Section 4.7, "NRC Notification of Commitment Changes/Deletions", requires submittal of a written report once per calendar year. This report shall contain a summary of commitment changes that require NRC notification.

The following commitment changes were implemented between July 1, 2011 and June 30, 2012 and require NRC notification.

Commitment change tracking number:	2012-001
CT number:	T02156
Commitment source document:	NRC Inspection Report 50-352/88-03
Change:	Deleted
Requestor:	Maintenance

Subject:

Timely closure of maintenance work packages.

Statement of commitment:

Revise procedure A-26 to require a specific time limit of 6 months on closure by entering them in the history file following MRF Section 6 signoff of completed work. Licensee is to delay Nuclear Operations QC closeout to streamline the process.

Change to commitment:

Deleted

Justification for change:

A-26 has been superseded by MA-MA-716-010-1010, which states that work orders shall be in history status within 90 days of either supervisor sign-off or work group supervisor acceptance; otherwise, they shall be formally tracked administratively. The commitment has been captured as part of an administrative control that is subject to a revision review process (i.e., SQR process). Therefore, annotation of the implementing document is no longer required.

Attachment - List of changes to NRC commitments  
November 30, 2012  
Page 2 of 2

Commitment change tracking number: 2012-013  
CT number: T03282  
Commitment source document: NRC Inspection Report 87-19, Reply to NOV  
Change: Delete  
Requestor: Engineering

Subject:

Control of design change documents.

Statement of commitment:

The Modification Coordinator or designee will review design change documents with the affected drawings to ensure that all those documents requiring red-lining are identified on the as-built drawing update form. Administrative procedure A-14, Appendix 7 will be revised to implement these items.

Change to commitment:

Deleted

Justification for change:

The original commitment was for the Modification Coordinator to ensure all documents requiring red-lining are identified on the "As-built Drawing Update Form". Red line drawings are those drawings maintained in an as-built condition which are required in the control room for day-to-day shift operations and for plant troubleshooting. The red-lining process has been eliminated, a time period has been established for the as-building of design changes thus eliminating the need for a red-line drawing. The current procedures, CC-AA-311, "Drawing Creation and Revision" and CC-AA-311-1001, "Controlled Document Prioritization" exceed the original commitment for updating critical control room drawings (red-line drawings) and are now classified as A1 Drawings/documents used for safe and reliable operation of the plant. These drawings are required by these procedures to be updated prior to return to service for field work, or 7 days for document changes following technical approval. In addition, the Maintenance Work Order procedure, MA-MA-716-010-1005, "Work Order (W/O) Planning Process", requires an activity to be generated for the up-dating of A1 drawings. These activities are required to be completed before the equipment is returned to service. The commitment has been met.