



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

December 20, 2012

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

SUBJECT: CHANGE TO PROPOSED LICENSE CONDITION REGARDING SAFETY
EVALUATION REPORT RELATED TO LICENSE RENEWAL OF LIMERICK
GENERATING STATION, UNITS 1 AND 2 (TAC NOS. ME6555 AND ME6556)

Dear Mr. Gallagher:

By letter dated July 31, 2012, the U.S. Nuclear Regulatory Commission (NRC) issued its "Safety Evaluation Report with Open Items Related to the License Renewal of Limerick Generating Station, Units 1 and 2," (SER) and requested that you provide comments on the document. By letters dated September 12, October 12, and November 6, 2012, Exelon Generation Company, LLC provided its comments.

During the review of the comments in your October 12 letter, the NRC staff found that you identified an issue with the second proposed license condition in SER Section 1.7, "Summary of Proposed License Conditions," for Limerick. Specifically, you commented that the second license condition in part states that future activities described in the updated final safety analysis report (UFSAR) supplement be completed prior to the period of extended operation (PEO) and that the applicant shall complete these activities no later than 6 months prior to the PEO. You commented that the completion implementation timeframe for these activities was earlier than Exelon had committed to perform the activities. Further, you stated that the proposed license condition creates consequences that the NRC staff may not have intended or appreciated. In this regard, the proposed license condition would not give Exelon the opportunity to perform certain inspections and tests during the last scheduled refueling outage prior to PEO for both Limerick units because the outages will occur within the six-month period prior to PEO. You also pointed out that certain aging management programs specifically require the inspections to be done close to the PEO to allow more time for the aging effects to develop and be detected by inspection.

After reviewing the comment and the additional basis that you provided in your November 6 letter, the staff is considering a revision of the proposed license condition. The second license condition is proposed as follows:

The licensee's UFSAR supplement submitted pursuant to 10 CFR 54.21(d), as revised during the license renewal application review process, describes certain future programs to be implemented and activities to be completed prior to the period of extended operation. Exelon shall implement the new programs and enhancements to existing programs no later than [6 month date prior to PEO Month Day, Year]. Exelon shall complete those one-time and initial inspection activities, and testing activities, which are to be completed prior to the period of

M. Gallagher

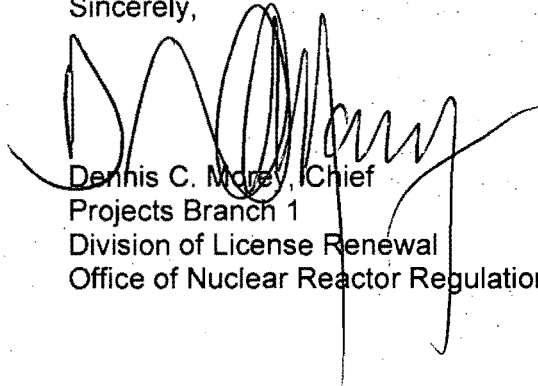
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extended operation and to the extent as delineated in Commitment Nos. 9, 18, 19, 20, 22, 23, 24, 28, 29, 30, 39, 40, 41, 42, 43, and 47 in Appendix A to the license renewal application, as supplemented, by [6 month date prior to PEO Month Day, Year] or no later than the end of the last refueling outage prior to the period of extended operation, unless required earlier to meet the commitment. Exelon shall notify the NRC in writing when implementation of the programs, is complete, and include the status of the inspection and testing activities to be completed before the period of extended operation.

The NRC staff requests that you review the changes to the proposed license condition and provide any comments by January 3, 2013.

If you have any questions, please contact Mr. Patrick Milano by telephone at 301-415-1457 or by email at Patrick.Milano@nrc.gov.

Sincerely,



Dennis C. McGee, Chief
Projects Branch 1
Division of License Renewal
Office of Nuclear Reactor Regulation

Docket Nos. 50-352 and 50-353

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extended operation and to the extent as delineated in Commitment Nos. 9, 18, 19, 20, 22, 23, 24, 28, 29, 30, 39, 40, 41, 42, 43, and 47 in Appendix A to the license renewal application, as supplemented, by [6 month date prior to PEO Month Day, Year] or no later than the end of the last refueling outage prior to the period of extended operation, unless required earlier to meet the commitment. Exelon shall notify the NRC in writing when implementation of the programs, is complete, and include the status of the inspection and testing activities to be completed before the period of extended operation.

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Sincerely,

/RA/

Dennis C. Morey, Chief
Projects Branch 1
Division of License Renewal
Office of Nuclear Reactor Regulation

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