
From: Gray, Mel

Sent: Thursday, May 16, 2013 4:14 PM

To: aceactivists@comcast.net

Cc: Barber, Scott; Screnci, Diane; Sheehan, Neil; McNamara, Nancy; Tifft, Doug; Dacus, Eugene; Weil, Jenny; Perkins, Leslie; Ennis, Rick; DiPaolo, Eugene

Subject: Response to Questions and Statements from ACE received on March 21 and 27, 2013

Dr. Cuthbert,

I am responding to information you provided to me during our public annual assessment open house regarding Limerick Station on March 21, 2013, and to similar information you provided to the Office of U.S. Congressman Gerlach on March 27, 2013, that were subsequently received by the NRC. There was significant overlap between these two documents. I have taken the opportunity to respond and where appropriate, have included references to NRC correspondence.

The following provides our responses to your questions and statements. I have included links to the NRC's public website that describe our regulatory oversight processes. I have also provided references in some cases to NRC documents specifically related to the Limerick Station. Attachment 1 provides responses related to the questions from ACE received by myself that were also covered in your email to U.S. Congressman Gerlach's Office. Attachment 2 covers three additional items from the information you handed me at March 21, 2013, that were not included in your email to U.S. Congressman Gerlach's Office.

All documents referenced in the attachments can be accessed through the NRC Public Document Room or from the Publicly Available Records (PARS) component of the NRC's document system (ADAMS). ADAMS is accessible from the NRC Website at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

I trust that this information is responsive to your needs. Additionally, I plan to attend the NRC's forthcoming meeting on May 23, 2013, where staff from NRC Headquarters will be available to discuss and receive comments on the draft Supplement 49 to the Generic Environmental Impact Statement for License Renewal of Nuclear Plants (NUREG-1437) for Limerick Generating Station. I will be available before and between the two meeting sessions to further discuss questions you may have related to the NRC inspection and safety oversight of the Limerick Generating Station. Alternatively, if you desire, please do not hesitate to contact me at 610-337-5209.

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Sincerely,

Mel Gray

Chief, Branch 4
Division of Reactor Projects
NRC Region I Office

Attachment 1

NRC Response to ACE Email of March 27, 2013

1. Exelon's 12-12 Evacuation Plan for Limerick Nuclear Plant Is Unworkable and Fatally Flawed

You provided questions in greater detail regarding this topic to the NRC staff previously on March 29, 2013. Mr. Joseph Anderson of the NRC's Office of Nuclear Security and Incident Response (NSIR) provided an email response to you dated April 16, 2013.

2. Limerick's Unprecedented Threats to Drinking Water For Almost Two Million People From Pottstown to Philadelphia Are Being Ignored/Dismissed by NRC in Relicensing.

The U.S. Environmental Protection Agency (EPA) (<http://www.epa.gov>) and the Pennsylvania Department of Environmental Protection (http://www.depweb.state.pa.us/portal/server.pt/community/dep_home/5968) have jurisdiction for any non-radioactive liquid releases from the plant. Limerick is required to meet water quality standards provided by these agencies.

Response: The NRC has jurisdiction for any radioactive releases from the plant. These releases must comply with requirements of 10 CFR 20. A summary of radioactive releases from the plant is listed in the annual effluents report. The Limerick 2012 annual effluents report was transmitted via letter dated April 30, 2013 (ADAMS Accession No. ML131270030). The number, type, and frequency of radioactive releases are periodically inspected by NRC. Both Limerick units are required to meet existing NRC's release regulations and will be required to meet any new regulations even if the license is renewed.

3. a. NRC's Irresponsible Delay of Fukushima Safety Measures For Limerick.

Response: The NRC has taken a methodical approach in reviewing and taking actions to address the March 2011 Fukushima Accident. In developing possible actions to address lessons learned from Fukushima, the Commission prioritized those actions to ensure timely implementation of the most important safety improvements. The prioritization, as described in a staff paper (ML13056A480) to the Commission dated October 3, 2011, consisted of three tiers ranging from actions that should be started without delay and for which sufficient resource flexibility exists (Tier 1), to those that should wait for other factors. These factors include further technical assessment, resolution of Tier 1 issues, or availability of critical staff skills (Tier 2), or those that require further study, or are dependent upon completion of a shorter-term action, or those that need a critical skill set that is also needed for higher priority work (Tier 3). This prioritization has allowed the Commission to address safety significant issues identified by the Near-Term Task Force, and after subsequent review by numerous stakeholders, the agency has proceeded with implementing the Tier 1 actions.

See the listed links for more information.

- [Japan Event Overview](#)
- [NRC Assessment of Event](#)
- [NRC Actions in Response to Event](#)
- [Additional Information and Resources](#)

b. Limerick is 3rd on the nation's earthquake risk list.

Response: The NRC does not rank nuclear plants by seismic risk and both Limerick units currently meet all seismic requirements imposed by the NRC. While recent data and models indicate that estimates of the potential for earthquake hazards for some nuclear power plants may be larger than previous estimates, the NRC has been determined that currently operating plants remain safe. This recent data warrants further study and analysis under NRC's Generic Issue Program.

The objective of the Generic Issue (GI) 199, "Implications of Updated Probabilistic Seismic Hazard Estimates in Central and Eastern U.S. on Existing Plants," was to perform a conservative, screening-level assessment to evaluate if further investigations of seismic safety for operating reactors in the central and eastern US are warranted, consistent with NRC directives. The results of the GI-199 safety/risk assessment should not be interpreted as definitive estimates of plant-specific seismic risk because some analyses were conservative making the calculated risk higher than in reality. The nature of the information used (both seismic hazard data and plant-level fragility information) make these estimates useful only as a screening tool.

Further actions to address the GI-199 issues are being taken as part of the regulatory actions by the NRC's Japan Lessons-Learned Project Directorate. Specifically, licensees have been requested, pursuant to 10 CFR 50.54(f), to perform a re-evaluation of the seismic hazards at the site using present-day NRC requirements and guidance. Further information regarding the seismic re-evaluation was previously provided to you by email from Mr. Paul Krohn on October 2, 2012.

If this recent information requires the implementation of new requirements, then the appropriate licensees will be issued orders directing their compliance. (<http://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr0933/sec3/199r1.html>)

c. Fracking in PA is increasing risk of earthquakes which can trigger meltdowns.

Response: The activities associated with drilling and hydraulic-fracturing (or hydro-fracking) are not regulated by the NRC. However, if new research were conducted (for example by the U.S. Geological Survey (USGS)) that showed that fracking could create larger or more frequent earthquakes, the NRC staff has established processes that would allow it to re-evaluate its regulatory actions based upon that new information. For more information concerning seismic issues, please view the following NRC web page: <http://www.nrc.gov/reading-rm/doc-collections/fact-sheets/fs-seismic-issues.html>.

Hydro-fracking has not been directly shown to be the cause of significant earthquakes. However, the disposal of the deep-well injection of the generated wastewater has the potential to trigger local earthquakes. Currently, this issue is an active area of research at the Department of Energy, USGS, and various universities. Open literature sources report that there does appear to be a causal link between the deep-well injection of wastewater and earthquakes at some locations (but not all). Recent, moderate magnitude earthquakes ($3.5 \leq M \leq 5.4$) have been associated with deep fluid injection in Arkansas, southern Colorado, Texas, Oklahoma and Ohio. Earthquakes of this magnitude have historically had little effect on well-engineered structures such as nuclear power plants. All currently operating nuclear power reactors, including the Limerick Generating Station, are designed to withstand the effects of natural phenomena, such as earthquakes. The NRC requires that safety-significant structures, systems, and components be designed to take into account:

- The most severe natural phenomena (earthquakes) historically reported for the site and surrounding area. The NRC's regulations require additional design margin be added to account for uncertainties due to a limited historical data record;
- Appropriate combinations of the effects of normal and accident conditions with the effects of the natural phenomena; and
- The importance of the safety functions to be performed.

Nonetheless, the NRC continues to monitor the safety of all currently operating nuclear power reactors. This effort includes a request for reactor licensees to re-evaluate seismic hazards as part of the NRC-required actions following the March 2011 Fukushima accident. Details regarding this request can be found on the NRC's Agencywide Documents Access and Management System (ADAMS) using the following Accession Number: ML12053A340. Any significant earthquakes will be considered during this reevaluation.

d. NRC IS DELAYING AND EVEN IGNORING SAFETY MEASURES RECOMMENDED BY THEIR OWN STAFF. THIS CAN RESULT IN UNTHINKABLE CONSEQUENCES TO EVERYONE IN THE GREATER PHILADELPHIA REGION. two years after Fukushima, NRC did nothing to enhance the safety of Limerick Nuclear Plant related to radiation released offsite in an accident / meltdown. This is negligent and unacceptable!

Response: While not specific, we believe your statement refers to the Near Term Task Force related to the Events in Japan. The NRC established a hierarchy of actions to be completed to address lessons learned from the Fukushima accident.

If you feel that NRC has not adequately implemented our reactor oversight program, you should feel free to contact the Office of the Inspector General (OIG) at NRC. The OIG established the Hotline (1-800-233-3497) program to provide the NRC employee, other government employee, licensee/utility employee, contractor employee, and the public with a confidential means of reporting incidences of suspicious activity to the OIG concerning fraud, waste, abuse, and employee or management misconduct. Mismanagement of agency programs or danger to public health and safety may also be reported through the Hotline.

It is not OIG's policy to attempt to identify people contacting the Hotline. People may contact the OIG by telephone, through an online form, or by mail. There is no caller identification feature associated with the Hotline or any other telephone line in the Inspector General's office. No identifying information is captured when you submit an online form. You may provide your name, address, or phone number, if you wish.

4. NRC IS PUSHING TO RELICENSE LIMERICK BEFORE NRC EVEN COMPLETES ITS COURT-ORDERED STUDY ON HIGH-LEVEL RADIOACTIVE WASTES IN SEPTEMBER 2014. THERE IS NO ACCEPTABLE EXCUSE TO FAIL TO CONSIDER LIMERICK'S 'SPENT FUEL' FOR LIMERICK'S EIS AND THE RELICENSING PROCESS. LIMERICK'S REACTOR LICENSE FOR UNIT 1 DOESN'T EXPIRE UNTIL 2014. 10 YEARS AFTER THE STUDY WILL BE COMPLETED. UNIT 2 EXPIRES IN 2029.

Response: The NRC does not have a specific interest in the license renewal of any nuclear power plant. A licensee must submit an application for license renewal that meets the agency's requirements before the NRC will take any action. If a licensee submits an application, the NRC reviews the submitted application to determine whether the effects of aging will be managed such that the plant can be operated during the period of extended operation without undue risk to health and safety of the public. This process is described in more detail on NRC's website. (<http://www.nrc.gov/reactors/operating/licensing/renewal.html>).

Regarding the ramifications of spent fuel disposal on the current NRC license renewal framework, the U.S. Court of Appeals for the DC Circuit found that some aspects of the 2010 Waste Confidence Decision (WCD) did not satisfy the NRC's NEPA obligations and vacated the Decision and Rule. This action resulted in a change of policy for license renewal. The court indicated that in making either a Finding of No Significant Impact based on an Environmental Assessment or in an Environmental Impact Statement supporting the rulemaking, the Commission needed to add additional discussions concerning the impacts of failing to secure permanent disposal for spent nuclear fuel, and concerning the impacts of certain aspects of potential spent fuel pool leaks and spent fuel pool fires.

In response to the court's ruling, the Commission, in CLI-12-16 (ML12220A094), determined that it would not issue licenses dependent upon the WCD, until the issues identified in the court's decision are appropriately addressed. In CLI-12-16, the Commission also noted that this determination extends only to final license issuance; all current licensing reviews and proceedings should continue to move forward.

In addition, the Commission directed in SRM-COMSECY-12-0016 (ML12250A032) that the NRC staff proceed with a rulemaking that includes the development of an EIS to support an updated WCD within 24 months (by September 2014). The Commission indicated that the EIS used to support the revised rule should build on the information already documented in various NRC studies and reports on the impacts associated with the storage of spent nuclear fuel that were developed as part of the 2010 WCD Update, and should primarily focus additional analyses on the deficiencies identified in the D.C. Circuit's decision. The NRC considers the WCD to be a generic issue that is best addressed through rulemaking, and that the NRC rulemaking process provides an appropriate forum for public review and comment on both the draft EIS and the proposed WCD.

5. EMERGENCY ENFORCEMENT PETITION TO REVOKE OPERATING LICENSES FOR GE MARK I REACTORS LIKE LIMERICK, IN VIOLATION OF SAFE OPERATION AND UNRELIABLE CONTAINMENT.

Response: This statement appears to relate to a 10 CFR 2.206 petition submitted related to the safety of BWR containments. There are two outstanding petitions in this area. The status of these petitions can be found at: <http://pbadupws.nrc.gov/docs/ML1236/ML12362A008.pdf>

6. NRC'S FAILED OVERSIGHT AND ENFORCEMENT AT LIMERICK NUCLEAR PLANT. NRC'S MISSION IS PROTECTING PUBLIC HEALTH AND SAFETY. INSTEAD, NRC WEAKENED REGULATIONS, PROVIDED DANGEROUS LOOPHOLES, FAILED TO PROVIDE MEANINGFUL ENFORCEMENT FOR VIOLATIONS, AND FAILED TO REQUIRE IMMEDIATE ACTION ON IMPORTANT SAFEGUARDS POST-FUKUSHIMA. NRC IS PROTECTING EXELON'S PROFITS, NOT PUBLIC HEALTH AND SAFETY OF MILLIONS OF PEOPLE IN THE GREATER PHILADELPHIA REGION IMPACTED BY LIMERICK NUCLEAR PLANT OPERATIONS.

NRC REPORTS REVEAL THAT OUR REGION HAS MORE CAUSE FOR ALARM THAN EVER BEFORE.

ACE REVIEWS OF NRC DOCUMENTS PROVIDE EVIDENCE OF NRC'S NEGLIGENT OVERSIGHT AND ENFORCEMENT:

- NRC LETTERS TO EXELON RELATED TO LIMERICK NUCLEAR PLANT
- NRC INTEGRATED INSPECTION REPORTS AND NOTICES OF VIOLATIONS FOR LIMERICK
- SAFETY EVALUATION REPORT RELATED TO LIMERICK LICENSE RENEWAL-JULY 2012

• SAFETY EVALUATION REPORT RELATED TO LIMERICK LICENSE RENEWAL -JANUARY 2013

Response: If you feel that NRC is not providing the oversight and enforcement actions necessary to protect public health and safety, you should feel free to contact the Office of the Inspector General (OIG) at NRC as was discussed in 3.d. above.

NRC'S REGULATORY NEGLIGENCE ON KEY HEALTH AND SAFETY ISSUES INCLUDE:

7. NRC'S FAILURE TO REQUIRE EXELON TO REPLACE AGING EQUIPMENT AND SYSTEMS PRIOR TO RELICENSING LIMERICK

a. It is beyond negligent and unacceptable to allow Exelon to avoid costs to immediately deal with the broad range of aging problems documented at Limerick Nuclear Plant. NRC is whitewashing evidence in its own safety evaluations for relicensing confirming after only 25 years of operation, Limerick is documented to be experiencing corrosion, cracking, pitting, fatigue, fouling, erosion, thinning through loss of material, embrittlement, and leaching of steel and other metals making up bolts, piping, welds, ducts, liners, cladding, external surfaces, and walls. Still, NRC overlooked seriousness threats to our future and caved in to Exelon's self-serving demands to avoid costs.

Response: Limerick performs periodic inservice inspections of various structures, systems, and components (SSCs) to ensure that the important plant materials and welds meet structural integrity requirements of their operating license and technical specifications. The NRC performs reviews of these programs as a part of its ongoing safety inspection program at all operating nuclear power plants. These inspections are performed during operations and will be performed at plants that are in their extended period of operation (i.e. License Renewal, if approved) (<http://pbadupws.nrc.gov/docs/ML0319/ML031990429.pdf>). These inspections are designed to ensure that licensee programs detect material degradation before it adversely affects the structural integrity requirements of a given facility. Plants are designed with excess margin because some amount of degradation is expected in various SSCs. NRC verifies through our inspections that licensee address degraded conditions in accordance with the applicable code or standard. Many of these codes and standards are applicable during license renewal and Exelon is required to manage the effects of aging as a part of license renewal per 10 CFR 54.21. (<http://www.nrc.gov/reading-rm/doc-collections/cfr/part054/part054-0021.html>).

The results of the NRC's ongoing detailed review of Limerick station's aging management program can be found by entering the following search term (ADAMS No.) in NRC's public website: ML12173A470. If you feel that NRC overlooked serious threats to your future, you should feel free to contact the Office of the Inspector General (OIG) at NRC as was discussed in 3.d. above.

8. NRC IS WHITEWASHING LIMERICK VIOLATIONS AND FAILING TO HOLD EXELON ACCOUNTABLE WITH MEANINGFUL ENFORCEMENT

a. Allowing Exelon to avoid immediate public notification with full and accurate disclosure for accidents is unacceptable. This can have profound health and safety consequences to our entire region, evidenced by the 3-19-12 radioactive spill into a vital drinking water source for almost two million people. The public was not told until 23 days after the spill with no time for prevention.

Response: NRC inspectors reviewed, in detail, Limerick station's reporting of a blocked cooling tower blowdown line that resulted in an unintended overflow from the plant and identified a non-cited violation of Title 10 of the Code of Federal Regulations (CFR) Part 50.72(b)(2)(xi) because the NRC Operations Center was not notified via the emergency notification system within four hours of a reportable event related to the health and safety of the public and protection of the environment for which notification to other government agencies was

made. Specifically, Exelon did not formally report, to the NRC Operations Center, the notification of other government agencies regarding an abnormal radioactive liquid release during a scheduled and planned effluent release from the Limerick Generating Station common cooling tower blow down line on March 19, 2012.

Additionally, NRC inspectors reviewed this event to determine its impact of public radiation safety. From the data available, the inspectors confirmed that the radiological conditions associated with this occurrence did not, nor were expected to, result in any significant projected public dose in excess of NRC regulatory limits and requirements. The inspectors did not identify any significant off-site dose consequences to members of the public associated with this spill. The NRC documented our conclusions regarding this spill in NRC Inspection Report 05000352/2012002 and 05000353/2012002. (ML12128A373)

9. NRC IS NOT REQUIRING EXELON TO IMMEDIATELY COMPLETE IMPLEMENTATION OF IMPORTANT NEW SAFETY RULES RECOMMENDED BY NRC'S OWN STAFF AFTER FUKUSHIMA };> This is unbelievable, given the potential consequences.

Response: NRC Commission direction to the NRC staff regarding the timing of the implementation of the Fukushima orders is described in our answer to No. 3 above.

10. NRC HAS DECIDED NOT TO CONSIDER THE RESULTS OF ITS NEW COURT-ORDERED STUDY ON HIGH-LEVEL RADIOACTIVE WASTES, IN ITS DETERMINATION ON RELICENSING LIMERICK };> This is unacceptable .

The NRC is complying with a court ordered ruling on its implementation of the Waste Confidence Act. The NRC is following NRC Commission direction to the staff as identified in our answer to No. 4 above.

11. NRC IS REFUSING TO REQUIRE EXPANDED EVACUATION AND INGESTION PATHWAY ZONES };> This is regulatory malpractice. Our Region Was Too Heavily Populated For Safe Evacuation Before Limerick Construction Was Completed. Now, With Increased Population and High Radiation Levels Documented Over A Hundred Miles From Fukushima, NRC Is Refusing To Protect Area Residents and Businesses By Expanding Evacuation Zones.

Response: In light of the events at Japan's Fukushima Dai-ichi Nuclear Power Plant in March 2011, the NRC in conjunction with other U.S. Government entities recommended a prudent and conservative travel advisory for U.S. citizens within a 50-mile range around the facility. This recommendation was based on the limited and often conflicting information regarding the status of the six Fukushima reactor units (and their associated spent fuel pools), which caused U.S. decision-makers to postulate a worst case scenario. The 50-mile travel advisory was issued by the U.S. State Department to inform U.S. citizens in Japan about the possible safety concerns that may affect their travel in and around the Fukushima prefecture.

Should a radiological event occur at a nuclear power plant in the U.S., a defense in depth strategy for protecting the public's health and safety is in place consisting of approved plans, processes, and equipment. These plans and strategies are practiced in biennial exercises and assessed periodically by the NRC and FEMA. Additionally, as the State has the overall authority for implementing its emergency response plan, it can expand its recommended protective actions beyond 10 miles, if warranted. Therefore, unlike the challenges that occurred during the Fukushima Dai-ichi events, the NRC staff believes that the State will have the needed information and resources to take the necessary actions to protect their constituents.

The NRC received numerous stakeholder recommendations, such as yours, encouraging the NRC staff to re-evaluate the EPZ basis for nuclear power reactor sites in the U.S. In response, the Commission established a senior-level agency Near-Term Task Force that conducted a methodical and systematic review of NRC processes and regulations to determine whether any enhancements to our regulatory structure were warranted. In July 2011, the Near-Term Task Force submitted its findings and recommendations to the Commission in a report entitled "Recommendations for Enhancing Reactor Safety in the 21st Century." Although the size and basis of EPZs were not one of the twelve recommendations as part of the review, the NRC staff proposed that consideration be given to re-evaluate the basis for EPZs as a long-term study.

There are plans to further study the potential health effects of the radioactivity released from the Fukushima Dai-ichi site. The United Nations Scientific Committee on the Effects of Atomic Radiation also has a two-year assessment of Fukushima impacts and a major initiative (the Fukushima Health Survey) planned that will inform a more detailed future dose assessment by recreating the whereabouts of every Fukushima prefecture resident from the time of the nuclear accident onwards. The NRC staff will continue to monitor the results of these efforts and their potential implications regarding the U.S. regulatory approach to emergency planning around nuclear power plants, including the EPZ size. In addition, the NRC is conducting a probabilistic risk assessment to gain a better understanding of potential radiological effects of postulated accident sequences including sites with multiple units. Although the staff believes that the existing basis for the EPZ size remains valid (including for multiunit events), the insights obtained from these studies will be included in the NRC staff's long-term study and will be used to inform the process of re-evaluating EPZ basis for nuclear power reactor sites in the U.S.

12. BACK-UP POWER REQUIREMENT IS WOEFULLY INADEQUATE TO PREVENT MELTDOWNS };> This is unacceptable given the potential consequences.

Response: Both Limerick Units fully meet all current NRC requirements for backup power. Each unit has two physically independent circuits between the offsite transmission network and the onsite safety related electrical distribution system, and four separate and independent emergency diesel generators (EDGs), each with a separate day tank and a separate fuel storage system containing certain required minimum volumes. The EDGs are periodically tested to ensure their availability during an emergency. A station blackout diesel generator is also available to mitigate the effects of a loss of all AC power to the site.

As a result of the lessons-learned from the Fukushima accident, the NRC developed a draft regulatory basis for a revised station blackout rule. The NRC staff has requested public comments on the draft regulatory basis as discussed in a press release dated April 4, 2013 (ADAMS Accession No. ML13095A146).

13. EARTHQUAKE RISK STILL UNADDRESSED AT LIMERICK };> Limerick Is Now 3rd On The Nation's Earthquake Risk-List. Increased Risk for Earthquakes In Our Region Can Trigger Meltdowns At Limerick,

Response: Our assessment of the earthquake risks at Limerick is explained in our answer to No. 3 above.

14. FILTERED VENTS THAT COULD REDUCE RADIATION RISKS ARE NOT BEING INSTALLED AT LIMERICK };> NRC Should Not Allow Exelon to Avoid This Cost It's About Public Health and Safety.

Response: In its March 12, 2012, Order, the NRC required Boiling-Water Reactors (BWR) with Mark I and Mark II containments to have a reliable hardened vent to remove decay heat and maintain control of

containment pressure within acceptable limits following events that result in the loss of active containment heat removal capability or prolonged Station Blackout (SBO). The hardened vent system was also required to be accessible and operable under a range of plant conditions, including a prolonged SBO and inadequate containment cooling. The NRC staff is evaluating the need to install filters as an adjunct to the reliable hardened vent. The Commission directed the staff to perform more study in this area. More information on this subtopic and related subtopics is available at the included hyperlink.

<http://pbadupws.nrc.gov/docs/ML1205/ML12054A694.pdf>

15. LAX FIRE SAFETY -Fire can lead to meltdowns, yet Limerick Nuclear Plant has never been required to follow the safest fire safety standards. Instead, Limerick has been allowed to follow nuclear industry-designed and weakened fire rules. };> This is unacceptable given the potential consequences at a nuclear plant.

Response: NRC Branch Chief Mr. Paul Krohn provided an answer to this question regarding Limerick's compliance with NRC fire standards in a March 10, 2009 letter. This document can be located by entering the following search term (ADAMS No.) in NRC's public website: ML090690770. As he mentioned, the NRC is continuing to perform fire inspections at least quarterly to confirm compliance with NRC fire protection regulatory requirements. Also, you should be aware that there is a fire protection team onsite this week performing a comprehensive review of this area as a part of our normal oversight. The results of this inspection will be documented in a publically available inspection report.

16. REVISED AMENDMENT FOR HOT SHUTDOWN IS FAR LESS PROTECTIVE -Limerick should not wait 7 days (instead of 12 hours), to go into hot shutdown when monitoring systems are inoperable. (12-19-11 Limerick Operating Permit Amendment).};> Ibis is unacceptable given radiation could be escaping within 112 hour of an accident!

Response: This NRC staff approved a license amendment to the Limerick station that revised the TS required actions for the reactor coolant system leakage instrumentation. The NRC concluded that there was reasonable assurance that the activities authorized by this amendment could be conducted without endangering the health and safety of the public. The safety basis for the NRC's approval of this amendment is documented in detail in its safety evaluation. This document can be located by entering the following search term (ADAMS No.) in NRC's public website: ML113210213.

17. UPRATES -ALREADY APPROVED, INCREASE OUR RADIATION EXPOSURE AND INCREASE MELTDOWN RISKS};> NRC Should NOT Allow Exelon To Operate Limerick Beyond its Design Capacity. No One Knows The Potential Consequences.

Response: On April 8, 2011, the NRC issued a revised facility operating license and certain technical specifications to implement an increase of approximately 1.65 percent in rated thermal power from their licensed thermal power limit of 3458 megawatts thermal (MWt) to 3515 MWt for both Limerick units. The NRC concluded that there was reasonable assurance that the activities authorized by this amendment could be conducted without endangering the health and safety of the public. The basis for the NRC's approval of this license amendment is documented in detail in its safety evaluation. This document can be located by entering the following search term (ADAMS No.) in NRC's public website: ML110691095.

Additionally, the NRC staff approved Limerick Units 1 and 2 also had 5% stretch power uprates in 1996 (Unit 1) and 1995 (Unit 2). The NRC concluded that there was reasonable assurance that the activities authorized by this amendment could be conducted without endangering the health and safety of the public. These

documents can be located by entering the following search term in NRC's public website: ML011560773 and ML011560244.

18. DRINKING WATER THREATS ACROSS SIX COUNTIES FROM LIMERICK OPERATIONS ARE BEING IGNORED BY NRC };> Safe Water, essential for health, is becoming more scarce due to Limerick operations. Radiation discharges increase health risks.

Response: Our assessment of the drinking water threats at Limerick is explained in our answer to No. 1 above.

Attachment 2

NRC Response to ACE Information provided at the March 21, 2013, Limerick Annual Assessment Meeting (not covered in the above)

1. Questions about Corrosion of the Suppression Pool liner.

Response: As a part of our detailed review of Limerick station's license renewal request, the NRC staff reviewed Exelon's actions related to the aging management program to address pitting and general corrosion in the suppression pool. The NRC staff considers this an open issue that Exelon must address as a part of their license renewal application (LRA) for the Limerick Units 1 and 2. This is currently an open issue in the NRC Safety Evaluation Report. This document can be located by entering the following search term (ADAMS No.) in NRC's public website: ML12173A470.

2. Questions related NRC's January 31, 2013, letter describing NRC's review of prior year decommissioning funding requirements and to Decommissioning Funding, in general.

Response: The NRC continues its review of Exelon's compliance with prior year decommissioning funding requirements. The nature of any future NRC action in this area is predecisional and will not be shared with the public at this time.

Much of the general information on this topic is discussed in an NRC backgrounder. This document is located at: <http://www.nrc.gov/reading-rm/doc-collections/fact-sheets/decommissioning.html>

3. Questions related to Spent Fuel Pool Instrumentation.

Response: The NRC staff is addressing this issue generically in its issuance of orders related to Fukushima accident. The specific details of this matter are described in the links provided in the answer to question 3.a. of attachment 1.