



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**

REGION I
2100 RENAISSANCE BLVD., SUITE 100
KING OF PRUSSIA, PA 19406-2713

July 9, 2014

Mr. Thomas J. Dougherty, Vice President
Limerick Generating Station
Exelon Generation Company – LLC
3146 Sanatoga Road
Pottstown, PA 19464

Subject: Review of Cross-Cutting Aspect for Finding 05000353/2013005-001

Dear Mr. Dougherty:

In response to your correspondence (Letter LG-14-079, "Review of Cross-Cutting Aspect for Finding 05000353/2013005-001," dated June 6, 2014), my staff has performed an independent review of the conversion of this finding from H.2(a) to H.6, which occurred as part of the implementation of a revised Inspection Manual Chapter (IMC) 0310, "Aspects Within Cross Cutting Areas," dated December 19, 2013 (effective January 1, 2014). As part of the implementation, a conversion table was provided in IMC 0310, which the Agency believed would address the majority of findings and simplify the transition. However, recognizing there might be exceptions, all licensees were asked to review the conversion of any findings from the second half of 2013. From your review, we understand that you have determined that H.3, Change Management, would be the appropriate cross-cutting aspect.

After reviewing your correspondence and the referenced inspection report, my staff agrees that H.3, Change Management, is most representative of the most significant contributing cause of the inspection finding. As such, we will recode inspection finding 05000353/2013005-001 to reflect a cross-cutting aspect of H.3. This change will also be documented in Limerick's second quarter integrated inspection report.

If you have any questions, please contact Raymond J. Powell at (610) 337-6967.

Sincerely,

/RA/

Ho K. Nieh, Director
Division of Reactor Projects

Docket No. 50-353
License No. NPF-85

cc: Distribution via ListServ

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