

Limerick Generating Station
3146 Sanatoga Road
Pottstown, PA 19462

www.exeloncorp.com SO EA-07-195

SO EA-07-195

February 15, 2008

ATTN: Document Control Desk
Director, Division of Spent Fuel Storage and Transportation
Office of Nuclear Material and Safeguards
U. S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Limerick Generating Station (LGS) Units 1 and 2
License Nos. NPF-39 & 85
Docket Nos. 50-352 & 50-353
ISFSI Docket No. 07200065

Subject: 20-Day Response to NRC Security Order EA-07-195 on ISFSI

Reference: NRC Security Order "Issuance of Order for Implementation of Additional Security Measures and Fingerprinting for Unescorted Access for Certain Spent Fuel Storage Licensees-Limerick Generating Station Independent Spent Fuel Storage Installation" (EA-07-195) dated January 28, 2008

Dear Sir:

Conditions III.A III.B and III.C of the January 28, 2008 order issued by the NRC requires Limerick to take the following actions with regard to Additional Security Measures (ASMs) for Independent Spent Fuel Storage Installation at Limerick.

A. "The Licensee shall comply with the requirements described in Attachments 1 and 2 to this Order, except to the extent that a more stringent requirement is set forth in the licensee's security plan. The licensee shall immediately start implementation of the requirements in Attachments 1 and 2 to the Order and shall complete implementation no later than 180 days from the date of this Order, with the exception of the ASM B.4 of Attachment 1 ["Additional Security Measures (ASMs) for Physical Protection of Dry Independent Spent Fuel Storage Installations (ISFSIs)], which shall be implemented no later than 365 days from the date of this Order. In any event, the licensee shall complete implementation of all ASMs before the first day that the spent fuel is initially placed in the ISFSI."

B.1 "The licensee shall within twenty (20) days of the date of this Order, notify the Commission: (1) if they are unable to comply with any of the requirements described in Attachments 1 and 2; (2) if compliance with any of the requirements is unnecessary, in its specific circumstances; or (3) if implementation of any of the requirements would cause the licensee to be in violation of the provisions of any Commission regulation or the facility license. The notification shall provide the licensee's justification for seeking relief from or variation of, any specific requirement."

B.2 "If the Licensee considers that implementation of any of the requirements described in Attachments 1 and 2 to this Order would adversely impact the safe storage of spent fuel, the licensee must notify the Commission within twenty (20) days of this Order, of the adverse impact, the basis for its determination that the requirement has an adverse

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safety impact, and either a proposal for achieving the same objectives specified in Attachments 1 and 2 requirements in question, or a schedule for modifying the facility, to address the adverse condition. If neither approach is appropriate, the licensee must supplement its response, to Condition B.1 of this Order, to identify the condition as a requirement with which it cannot comply, with attendant justifications, as required under Condition B.1 "

C.1 "The licensee shall within twenty (20) days of this Order, submit to the Commission, a schedule for achieving compliance with each requirement described in Attachments 1 and 2"

C.2 "The licensee shall report to the Commission when it has achieved full compliance with the requirements described in Attachments 1 and 2"

Enclosures 1 and 2 contain the Limerick 20-Day response to the referenced Security Order. Limerick intends to comply with the requirement of the referenced Order described in Attachments 1 and 2 of the Order.

The Independent Spent Fuel Storage Installation (ISFSI) at Limerick is located on site in the Protected Area. Therefore, Section D of Attachment 1 applies. Limerick ISFSI is co-located with the power reactor and Limerick's Security Plan complies with the NRC-approved access authorization program. Therefore, the response to sections B through G of Attachment 2 is not warranted.

Enclosure 3 contains the list of regulatory commitments associated with this response.

This response is being submitted in response to 10CFR73.21, and therefore needs to be withheld from public disclosure.

If you have any questions, please contact Ollie Becker at 610-718-2044.

Sincerely,

Edward W. Callan for C.H. Mudrick

Christopher H. Mudrick
Vice President, LGS
Exelon Generation Company, LLC

Enclosures: 1. Response to Attachment 1 of SO ISFSI (SGI)
2. Response to Attachment 2 of SO ISFSI (SGI)
3. Summary of Regulatory Commitments (SGI)