



~~SAFEGUARDS INFORMATION~~

10 CFR 50.54(f)

RS-14-326  
LG-14-155

December 5, 2014

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

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

**Subject:** Response to March 12, 2012, Request for Information Pursuant to Title 10 of the Code of Federal Regulations 50.54(f) Regarding Recommendations of the Near-Term Task Force Review of Insights from the Fukushima Dai-ichi Accident, Enclosure 5, Recommendation 9.3, Emergency Preparedness – Staffing, Requested Information Items 1, 2, and 6 - Phase 2 Staffing Assessment

**References:**

1. NRC Letter, Request for Information Pursuant to Title 10 of the Code of Federal Regulations 50.54(f) Regarding Recommendations 2.1, 2.3, and 9.3, of the Near-Term Task Force Review of Insights from the Fukushima Dai-ichi Accident, dated March 12, 2012
2. Exelon Generation Company, LLC letter to USNRC, Response to March 12, 2012, Request for Information Pursuant to Title 10 of the Code of Federal Regulations 50.54(f) Regarding Recommendations of the Near-Term Task Force Review of Insights from the Fukushima Dai-ichi Accident, Enclosure 5, Recommendation 9.3, Emergency Preparedness – Staffing, Requested Information Items 1, 2, and 6 - Phase 2 Staffing Assessment, dated December 5, 2014 (RS-14-325)
3. NRC Order Number EA-12-049, "Issuance of Order to Modify Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events," dated March 12, 2012

On March 12, 2012, the NRC staff issued a letter entitled Request for Information Pursuant to Title 10 of the Code of Federal Regulations 50.54(f) Regarding Recommendation 9.3 of the

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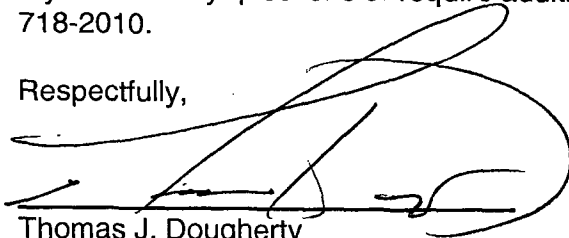
Near-Term Task Force Review of Insights from the Fukushima Dai-ichi Accident (Reference 1). Reference 1 requested an assessment of the onsite and augmented staff needed to respond to a large scale natural event and implement identified mitigating strategies.

In Reference 2, Exelon Generation Company, LLC (EGC) provided the Limerick Generating Station Phase 2 Staffing Assessment Report addressing the functions and strategies related to Fukushima Near-Term Task Force Recommendation 4.2 and NRC Order EA-12-049 (Reference 3). The Limerick Generating Station Phase 2 Staffing Assessment Report considers the use of onsite security personnel as supplemental staff resources available to assist with the implementation of mitigating strategies following a Beyond-Design-Basis-External-Event (BDBEE) event. The supporting basis and evaluation related to use of security personnel during a BDBEE event is provided in Attachment 1 to this letter.

Attachment 1 contains Safeguards Information. Therefore, EGC requests that this information be withheld from public disclosure in accordance with 10 CFR 2.390, "Public inspections, exemptions, requests for withholding," paragraph (a), and 10 CFR 73.21, "Protection of Safeguards Information: Performance requirements," paragraph (a)(1)(i).

If you have any questions or require additional information, please contact Keith Kemper at 610-718-2010.

Respectfully,



Thomas J. Dougherty  
Vice President – Limerick Generating Station, Units 1 and 2  
Exelon Generation Company, LLC

Attachments: 1. Limerick Generating Station Basis for Response to Staffing Assessment Questions Related to Use of Security Personnel During a Beyond-Design-Basis External Event (**Contains Safeguards Information**)

cc: Regional Administrator - NRC Region I

w/attachments

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