

## PUBLIC NOTICE

### NRC STAFF PROPOSES TO AMEND OPERATING LICENSE AT THE LIMERICK GENERATING STATION, UNIT 2

The U.S. Nuclear Regulatory Commission (NRC or the Commission) has received an application dated February 12, 2015 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML15043A649), from Exelon Generation Company, LLC (Exelon, the licensee), for an amendment to the operating license for the Limerick Generating Station (LGS), Unit 2, located in Montgomery County, Pennsylvania.

The proposed amendment would extend the implementation period for Limerick Generating Station Unit 2, Amendment No. 174, which was issued by the NRC staff on December 29, 2014 (ADAMS Accession No. ML14324A808). Amendment No. 174 was effective as of the date of issuance (i.e., on December 29, 2014) and was required to be implemented within 60 days (i.e., by February 27, 2015). Due to unforeseen difficulties associated with calibration of a temperature indicating switch, Exelon requested that the implementation period be extended. Specifically, Exelon requested that implementation not be required until prior to startup from the spring 2015 refueling outage.

Amendment No. 174 revised technical specification (TS) setpoints and allowable values for certain area temperature instrumentation associated with the leak detection system (LDS). The purpose of the LDS is to detect and provide the signals necessary to isolate leakage from the reactor coolant pressure boundary before pre-determined limits are exceeded. The affected TS instrumentation monitor ambient temperature in the reactor water cleanup system area, the high pressure coolant injection equipment room and pipe routing area, and the reactor core isolation cooling equipment room and pipe routing area. The changes made by Amendment No. 174 established new temperature setpoint values such that normal variations in the

maximum operating temperatures for the affected plant areas would not result in spurious system isolations.

The licensee requested that the proposed amendment be processed on an exigent basis, in accordance with the provisions in Title 10 of the *Code of Federal Regulations* (10 CFR) Section 50.91(a)(6). Under 10 CFR 50.91(a)(6)(i)(B), where the Commission finds that exigent circumstances exist, in that a licensee and the Commission must act quickly and that time does not permit the Commission to publish a *Federal Register* notice allowing 30 days for prior public comment, and it also determines that the amendment involves no significant hazards considerations, the Commission will use local media to provide reasonable notice to the public in the area surrounding a licensee's facility of the licensee's amendment and of its proposed determination that no significant hazards consideration is involved, consulting with the licensee on the proposed media release and on the geographical area of its coverage.

The licensee is basing exigent circumstances on the following considerations. During implementation of the various setpoint changes associated with Amendment No. 174 for LGS, Unit 2, an unforeseen equipment problem was recently identified. The problem involved an inoperable key pad needed to make the setpoint changes to one temperature indicating switch. To repair the key pad, equipment would need to be deenergized and removed from service. This would result in declaring equipment inoperable, in accordance with the plant TSs. Based on probabilistic risk assessment and operational risk considerations, the plant would be considered in a higher risk configuration under these circumstances. The extension of the implementation period would allow Exelon to complete the necessary calibration to the temperature indicating switch during less risk-significant operating conditions (i.e., during a refueling outage). Without the proposed amendment, the licensee would be in violation of the LGS, Unit 2, operating licensee if the changes approved in Amendment No. 174 were not

implemented by February 27, 2015. It is noted that the inability to revise the setpoints, due to the inoperable key pad, does not affect the ability of the temperature indicating switch to perform its intended functions with the currently calibrated setpoints.

As required by 10 CFR 50.91(a), the licensee has provided its analysis of the issue of no significant hazards consideration, using the standards in 10 CFR 50.92. The NRC staff's review is presented below.

Operation of LGS, Unit 2, in accordance with the proposed amendment would not involve a significant increase in the probability or consequences of an accident previously evaluated. The proposed amendment extends the implementation period specified in LGS Amendment No.174 from 60 days to prior to startup from the spring 2015 Unit 2 refueling outage. As such, the proposed amendment is purely administrative in nature. No physical changes to the plant will occur as a result of the proposed amendment. In addition, the proposed amendment will not change the operation of any plant structure, system, or component (SSC). Therefore, the proposed amendment does not have any effect on the ability of any SSC from performing its intended design function and does not have any impact on the ability of any SSC from preventing or mitigating any previously evaluated accident.

Therefore, the proposed amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed amendment would not create the possibility of a new or different kind of accident from any previously analyzed. The proposed amendment is purely administrative in nature. The proposed amendment does not involve any physical changes to the plant and does not involve any changes in the operation of the plant. Therefore, the proposed amendment would not introduce any new accident initiators, nor would it have any effect on the capability of any plant SSC from performing its intended safety function.

Therefore, the proposed amendment does not create the possibility of a new or different kind of accident from any accident previously evaluated.

The proposed amendment would not involve a significant reduction in a margin of safety. Margin of safety is related to the confidence in the ability of the fission product barriers (i.e., fuel cladding, reactor coolant pressure boundary, and containment) to limit the level of radiation dose to the public. The proposed amendment is purely administrative in nature. The proposed amendment does not involve any physical changes to the plant and does not involve any changes in the operation of the plant. Therefore, the proposed amendment does not have any effect on the capability of the fission product barriers to limit the level of radiation dose to the public.

Therefore, the proposed amendment does not involve a significant reduction in a margin of safety.

Following an initial review of this application, the requested amendment has been evaluated against the standards in 10 CFR 50.92 and the NRC staff has made a proposed (preliminary) determination that the requested amendment involves no significant hazards consideration. The changes do not significantly increase the probability or consequences of any accident previously considered, nor create the possibility of an accident of a different kind, nor significantly decrease any margin of safety.

If the proposed determination that the requested license amendment involves no significant hazards consideration becomes final, the staff will issue the amendment without first offering an opportunity for a public hearing. An opportunity for a hearing will be published in the *Federal Register* at a later date and any hearing request will not delay the effective date of the amendment.

If the staff decides in its final determination that the amendment does involve a significant hazards consideration, a notice of opportunity for a prior hearing will be published in the *Federal Register* and, if a hearing is granted, it will be held before the amendment is issued.

Comments on the proposed determination of no significant hazards consideration may be (1) telephoned to Mr. Douglas Broaddus, Chief, Plant Licensing Branch I-2, by collect call to 301-415-8124, or by facsimile to 301-415-2102, (2) e-mailed to [Doug.Broaddus@nrc.gov](mailto:Doug.Broaddus@nrc.gov), or (3) submitted in writing to the Chief, Rules, Announcements and Directives Branch, Division of Administrative Services, Office of Administration, Mail Stop: OWFN-12-H08, U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001. All comments received by 5:00 p.m. on February 24, 2015, will be considered in reaching a final determination. A copy of the application may be examined electronically through the NRC's Agencywide Documents Access and Management System (ADAMS) in the NRC Library at <http://www.nrc.gov/reading-rm/adams.html> and at the Commission's Public Document Room (PDR), located at One White Flint North, Public File Area O1 F21, 11555 Rockville Pike (first floor), Rockville, Maryland. Persons who do not have access to ADAMS or who encounter problems in accessing the documents located in ADAMS should contact the NRC PDR reference staff by telephone at 1-800-397-4209, or 301-415-4737, or by e-mail to [pdr.resource@nrc.gov](mailto:pdr.resource@nrc.gov).