




UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

February 19, 2015

MEMORANDUM TO: Douglas A. Broaddus, Chief  
Plant Licensing Branch I-2  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

FROM: Richard B. Ennis, Senior Project Manager   
Plant Licensing Branch I-2  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

SUBJECT: LIMERICK GENERATING STATION, UNITS 1 AND 2, DRAFT  
REQUEST FOR ADDITIONAL INFORMATION (TAC NOS. MF5133  
AND MF5134)

The enclosed draft request for additional information (RAI) was transmitted on February 19, 2015, to Ms. Stephanie Hanson of Exelon Generation Company, LLC (Exelon, the licensee). This information was transmitted to facilitate an upcoming conference call in order to clarify the licensee's amendment request for Limerick Generating Station (LGS), Units 1 and 2 dated November 3, 2014. The proposed amendment would add new Limiting Conditions for Operation (LCOs) 3.0.5 and 3.0.6 to the Applicability Section of the LGS Technical Specifications (TSs). LCO 3.0.5 establishes the allowance for restoring equipment to service under administrative controls when it has been removed from service or declared inoperable to comply with TS Action requirements. LCO 3.0.6 provides appropriate actions to be taken when the inoperability of a support system results in the inoperability of related supported systems. In addition, the proposed changes involve adding new Safety Function Determination Program (SFDP) requirements to the Administrative Section of the TSs to ensure that a loss of safety function is detected and appropriate actions are taken when LCO 3.0.6 is entered.

The draft RAI was sent to Exelon to ensure that the questions are understandable, the regulatory basis for the questions is clear, and to determine if the information was previously docketed. This memorandum and the enclosure do not convey or represent an NRC staff position regarding the licensee's request.

Docket Nos. 50-352 and 50-353

Enclosure: Draft RAI

DRAFT REQUEST FOR ADDITIONAL INFORMATION

REGARDING PROPOSED LICENSE AMENDMENT

ADD NEW LIMITING CONDITIONS FOR OPERATION 3.0.5 AND 3.0.6

EXELON GENERATION COMPANY, LLC

LIMERICK GENERATING STATION, UNITS 1 AND 2

DOCKET NOS. 50-352 AND 50-353

By application dated November 3, 2014 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML14308A144), Exelon Generation Company, LLC (Exelon, the licensee), submitted a license amendment request for Limerick Generating Station (LGS), Units 1 and 2. The proposed amendment would add new Limiting Conditions for Operation (LCOs) 3.0.5 and 3.0.6 to the Applicability Section of the LGS Technical Specifications (TSs). LCO 3.0.5 establishes the allowance for restoring equipment to service under administrative controls when it has been removed from service or declared inoperable to comply with TS Action requirements. LCO 3.0.6 provides appropriate actions to be taken when the inoperability of a support system results in the inoperability of related supported systems. In addition, the proposed changes involve adding new Safety Function Determination Program (SFDP) requirements to the Administrative Section of the TSs to ensure that a loss of safety function is detected and appropriate actions are taken when LCO 3.0.6 is entered.

The Nuclear Regulatory Commission (NRC) staff is reviewing your submittal and has determined that additional information is needed to complete its review as indicated below.

Background

The licensee stated in Section 1.0 of Attachment 1 to the application dated November 3, 2014, that the proposed changes conform to the requirements of 10 CFR 50.36 for the contents of TSs, and are consistent with the improved Standard Technical Specifications (STS) issued by the NRC in NUREG-1433, "Standard Technical Specifications - General Electric BWR/4 Plants."

The licensee is proposing to add new LCOs 3.0.5 and 3.0.6, which would read as follows:

3.0.5 Equipment removed from service or declared inoperable to comply with ACTIONS may be returned to service under administrative control solely to perform testing required to demonstrate its OPERABILITY or the OPERABILITY of other equipment. This is an exception to Specifications 3.0.1 and 3.0.2 for the system returned to service under administrative control to perform the testing required to demonstrate OPERABILITY.

Enclosure

3.0.6 When a supported system Limiting Condition for Operation is not met solely due to a support system Limiting Condition for Operation not being met, the ACTIONS associated with this supported system are not required to be entered. Only the support system Limiting Condition for Operation ACTIONS are required to be entered. This is an exception to Specifications 3.0.1 and 3.0.2 for the supported system. In this event, an evaluation shall be performed in accordance with Specification 6.17, "Safety Function Determination Program (SFDP)." If a loss of safety function is determined to exist by this program, the appropriate ACTIONS of the Limiting Condition for Operation in which the loss of safety function exists are required to be entered.

When a support system's ACTION directs a supported system to be declared inoperable or directs entry into ACTIONS for a supported system, the applicable ACTIONS shall be entered in accordance with Specification 3.0.1.

Current TS LCO 3.0.1 for LGS Units 1 and 2 states:

3.0.1 Compliance with the Limiting Conditions for Operations contained in the succeeding Specifications is required during OPERATIONAL CONDITIONS or other conditions specified therein; except that upon failure to meet the Limiting Conditions for Operation, the associated ACTION requirements shall be met.

#### Request for Additional Information

STS LCOs 3.0.5 and 3.0.6 only have LCO 3.0.2 identified as an exception. The proposed LCOs 3.0.5 and 3.0.6 for LGS identified LCOs 3.0.1 and 3.0.2 as exceptions. This is not consistent with NUREG 1433, Revision 4. Please explain this discrepancy.

In addition, since your proposed change is not consistent with NUREG 1433, please describe if the language in the proposed LGS TS LCOs 3.0.5 and 3.0.6 introduces any changes, either in technical requirements or in the TS usage rules, from the language used in the STS.

February 19, 2015

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The draft RAI was sent to Exelon to ensure that the questions are understandable, the regulatory basis for the questions is clear, and to determine if the information was previously docketed. This memorandum and the enclosure do not convey or represent an NRC staff position regarding the licensee's request.

Docket Nos. 50-352 and 50-353

Enclosure: Draft RAI

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