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Sent: Monday, February 23, 2015 12:26 PM
To: Broaddus, Doug
Cc: Ennis, Rick; Krohn, Paul; NRDC; Evan Brandt
Subject: ACE Comments - Limerick Operating Permit Amendment - Unit 2

February 23, 2015

To: **Mr. Douglas Broaddus, NRC Chief**
Plant Licensing Branch 1-2
Doug.Broaddus@nrc.gov

From: **Alliance For A Clean Environment, ACE**
Dr. Lewis Cuthbert, President
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Subject: **Limerick Nuclear Plant - Unit 2**
ACE Objection to Exelon's Requested Amendment of Amendment No. 174,
"Leak Detection System Setpoint and Allowable Value Changes"

We are opposed to NRC staff's proposal to amend Limerick's Unit 2 operating license yet again. Amendment No. 174 was just issued on December 29, 2014, only two months after NRC relicensed Limerick.

It is incomprehensible that Exelon can't comply with the amendment it requested just two months ago. More disturbing is the fact that NRC states that this new amendment request is "due to unforeseen difficulties associated with calibration of a temperature indicating switch" and newly identified problems with an inoperable key pad.

This equipment is essential to the implementation of new setpoints and thermal calibrations and is required to be implemented within 60 days of the issuance of Amendment No. 174. (February 27, 2015).

NRC should not allow an amendment to Amendment No. 174 just because Exelon cannot or will not comply with it. Exelon's new amendment request acknowledges inoperable equipment. Inoperable equipment is the reason Amendment No.174 mandates shutdown of Unit 2 as of February 27, 2015 or be in violation of its LGS Unit 2 operating license unless it shuts down.

Inoperable equipment is a pervasive problem at Limerick, especially for Unit 2. This equipment inoperability is not the only equipment that is inoperable in Unit 2.

Two other amendments that have great significance in light of Exelon's current request to amend Amendment No. 174 are:

- The removal of Commitment No.46 from Limerick's relicensing application. Commitment No. 46 required testing of Exelon's Aging Management Program at

Limerick. NRC granted Exelon an amendment to remove the test despite NRC's concerns that a decade would go by with no test.

- At least four years ago, NRC cited Exelon with a "white violation" of NRC regulations per NRC's Technical Specifications (11-4-11) due to failure of Limerick's Unit 2 Motor Operated Valve (MOV).

December 8, 2011: **NRC sent a letter to Exelon that explained, among other requirements, that if certain conditions are not met by the PCIVs, Limerick's Unit 2 reactor must be in at least hot shutdown within the next 12 hours and cold shutdown within the following 24 hours.**

- We are concerned that these time requirements may not still apply to Limerick Unit 2 due to amendment changes to NRC's TS.

November 14, 2012 Exelon requested amendments to "relocate the Technical Specification (TS) requirements for motor-operated valve thermal overload protection from NRC's TSs to Exelon's Technical Requirements Manual.

- March 19, 2013: NRC approved Exelon's MOV amendment.
- This amendment changed and reduced the kind of oversight and compliance that would have been required by NRC's TSs. The MOV failure initiated a domino effect of inoperability: It caused two other systems to fail, resulting in Reactor Core Isolation Cooling (RCIC) and the Primary Containment Isolation Valves (PCIV) inoperability for a month (4-23-11 to 5-23-11).

December 23, 2014: the NRC issued an evaluation of new "Changes, Tests or Experiments, and Permanent Plant Modifications" which included cutting power to loss-of-power/overload alarms and removing them from service.

- This experimental process is unacceptable. Experimentation outlined in NRC's December 23, 2014 letter irresponsibly allows Exelon to keep Limerick operating despite inoperable equipment.
- Current viability of safe shut down of Unit 2 in an emergency is based on sheer conjecture.
- Power has been removed from the RCIC valve motors with the valves in the open position. Some other valve motors and alarms also have no power, and the valves are set in an open or shut position.
- Exelon's well documented history of equipment inoperability in Limerick's Unit 2 suggests that Exelon's experiments are far too risky to continue.

Hollow unsubstantiated assurances from NRC or Exelon are neither acceptable nor sufficient given the potential consequences for Unit 2 meltdown.

- Millions of people in the Greater Philadelphia Region are at risk due to Exelon's risky experimentation and NRC's lax oversight of Unit 2.
- We have no confidence that Unit 2 can be shut down quickly and safely.

Manipulating public perception to make Limerick appear to be in compliance with NRC regulations by amending regulations to accommodate Limerick's inability to comply with NRC's already lax regulations is a prescription for disaster.

Exelon's serial violations and repeated inability to comply with NRC regulations jeopardized long-term plant stability and increase risks to public health and safety. It is shameful that NRC even considers and approves Exelon's repeated attempts to hide Limerick's violations and deficiencies through amendments to Limerick's operating license.

Why NRC would even consider approving this amendment for Limerick's safety-challenged Unit-2 reactor is beyond comprehension. Evidence suggests Unit 2 equipment is far too degraded to be quickly, safely, or reliably shut down in an emergency.

LIMERICK UNIT 2 SHOULD BE SHUT DOWN IMMEDIATELY