

August 24, 2015

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 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 Request for Additional Information Regarding Proposed Relief Request to Utilize Code Case OMN-18 for Limerick Generating Station, Units 1 and 2

- References:
- 1) Letter from J. Barstow (Exelon Generation Company, LLC) to the U.S. Nuclear Regulatory Commission, "Submittal of Relief Request to Utilize OMN-18," dated April 13, 2015
 - 2) E-mail correspondence from R. Ennis (U.S. Nuclear Regulatory Commission) to T. R. Loomis (Exelon Generation Company, LLC), "Limerick Generating Station Units 1 and 2 – Draft Request for Additional Information Regarding Proposed Relief Request to Utilize Code Case OMN-18 (ML15202A378)," dated July 13, 2015

By letter dated April 13, 2015, Exelon Generation Company, LLC (Exelon) submitted a relief request to the U.S. Nuclear Regulatory Commission (NRC) for Limerick Generating Station (LGS), Units 1 and 2 (Reference 1). The relief request concerns the use of OMN-18, "Alternate Testing Requirements for Pumps Tested Quarterly Within $\pm 20\%$ of Design Flow."

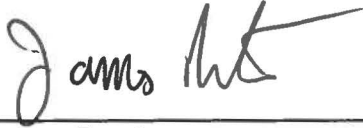
In the Reference 2 e-mail correspondence, the U.S. NRC requested additional information. Attached is our response.

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Relief Request to Utilize Code Case OMN-18
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There are no regulatory commitments in this letter.

If you have any questions concerning this response, please contact Stephanie J. Hanson at 610-765-5143.

Respectfully,

A handwritten signature in black ink, appearing to read "James Barstow", written over a horizontal line.

James Barstow
Director, Licensing and Regulatory Affairs
Exelon Generation Company, LLC

Attachment: Response to Request for Additional Information Regarding Proposed Relief
Request to Utilize Code Case OMN-18

cc: USNRC Region I, Regional Administrator
USNRC Senior Resident Inspector, LGS
USNRC Project Manager, LGS
R. R. Janati, Bureau of Radiation Protection

ATTACHMENT

**Response to Request for Additional Information Regarding
Proposed Relief Request to Utilize Code Case OMN-18**

By letter dated April 13, 2015, Exelon Generation Company, LLC (Exelon) submitted a relief request to the U.S. Nuclear Regulatory Commission (NRC) for Limerick Generating Station (LGS), Units 1 and 2. The proposed relief request concerns the use of American Society of Mechanical Engineers (ASME) *Boiler and Pressure Vessel Code* (Code) Case OMN-18, "Alternate Testing Requirements for Pumps Tested Quarterly Within $\pm 20\%$ of Design Flow."

The NRC staff has determined that additional information is needed to complete its review. The specific request for additional information (RAI) is restated below along with Exelon's response.

Question 1:

Code Case OMN-18 has a note that states, "Subsection ISTB allows the Owner to categorize the pumps in their program. As such, an Owner could categorize a pump that otherwise meets the requirements of Group B, as a Group A pump, and test according to this Code Case. However, in doing so they are obtaining additional data (vibration and flow or differential pressure) quarterly, rather than once every 2 yr." Confirm that the pumps listed in Section 1, "ASME Code Component(s) Affected," of the relief request that are categorized as Group B pumps, will be re-categorized as Group A pumps.

Response:

Limerick Generating Station (LGS), Units 1 and 2, intends to follow the Code Case as written. Pumps which are presently classified as Group B pumps, in which OMN-18 is invoked, will be re-classified as Group A pumps.