Exelon Generation®

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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: Annual Commitment Change Summary Report

This report summarizes Limerick Generating Station (LGS) changes to NRC commitments that meet the threshold for reporting for the period from July 1, 2014, to June 30, 2015. Changes to these commitments are performed using procedure LS-AA-110, Commitment Management, which employs the guidance provided in NEI 99-04, Guidelines for Managing NRC Commitment Changes. NEI 99-04 was approved by the NRC for licensee use by SECY-00-045, Acceptance of NEI 99-04, 'Guidelines for Managing NRC Commitments'. Licensees were informed that NEI 99-04 was an acceptable process for control of regulatory commitments by the issuance of RIS 2000-17, Managing Regulatory Commitments made by Power Reactor Licensees to the NRC Staff, on September 21, 2000.

This report includes one commitment change summary and the details are provided in the attachment.

This report also summarizes the late completion of committed actions that did not require a courtesy letter to the NRC. There were no late or missed regulatory commitments that required reporting in this report.

There are no new regulatory commitments contained in this letter.

If you have any questions, please contact Robert B. Dickinson at (610) 718-3400.

Respectfully,

Original signed by

Richard W. Libra
Vice President – Limerick Generating Station
Exelon Generation Company, LLC

Attachment: List of Changes to NRC Commitments

cc: Administrator Region I, USNRC
USNRC Senior Resident Inspector, LGS

LS-AA-110 Commitment Management, Section 4.7, “NRC Notification of Commitment Changes/Deletions,” requires submittal of a written report once per calendar year. This report shall contain a summary of commitment changes that require NRC notification.

The following commitment change was implemented between July 1, 2014, and June 30, 2015, and requires NRC notification.

Commitment change tracking number:	2015-001
CT number:	T04820
Commitment source document:	Response to Generic Letter 88-14
Change:	Revised
Requestor:	Engineering

Subject:

Response to Generic Letter 88-14, “Instrument Air Supply System Problems Affecting Safety-Related Equipment”

Statement of commitment:

GL 88-14
Instrument air quality at the safety-related components is verified by periodic testing performed during each refueling outage which determines the level of moisture, hydrocarbon content, and particulate sizes. This test is performed at three randomly selected locations, including a randomly selected Main Steam Isolation Valve operator manifold, a randomly selected Automatic Depressurization System Main Steam Relief Valve operator, and a randomly selected Control Rod Drive Hydraulic Control Unit air supply header.

Change to commitment:

Revised as follows:

Monitor air quality at several points throughout the instrument air system on a quarterly basis. Establish a technical basis for frequencies greater than quarterly. Ensure instrument air quality is maintained within the requirements of the most current ANSI/ISA standard as measured at the discharge of the air dryers and after-filters. Ensure air testing and sampling methods are performed in accordance with the most current ISO-8573 for solid particle content (particulates), humidity (dew point), oil aerosol content, and oil vapor and organic solvent content. The air quality at the inlet supply to safety-related and critical components should be maintained within the specifications of equipment vendors. (per SOER 88-01, Rev 1, Recommendation 4)

Justification for change:

Based on vendor documents, engineering judgment, and INPO recommendations, testing the instrument air/gas quality quarterly is more conservative than the current testing frequency and will allow for trending and correcting of instrument air quality issues. Since instrument air/gas quality requirements are more stringent than the vendor requirements for safety-related components and there are no components between the air/gas dryers and the safety-related components that could introduce moisture, oil, or particulates, testing at an upstream location is equivalent to sampling at the safety-related component's individual manifold for the purpose of verifying sufficient air/gas quality. The quarterly testing frequency and change in sampling location meet the recommendations in NUREG 1275, Volume 2 and SOER 88-01.