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The attachment to this letter contains GEH Confidential/Proprietary Information;
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Exelon Generation®

10 CFR 50.90

May 9, 2016

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: License Amendment Request - Supplement
Proposed Revision to Technical Specifications in Response to GE Energy - Nuclear 10 CFR Part 21 Safety Communication SC05-03

References:
1. Letter from James Barstow (Exelon Generation Company, LLC) to U.S. Nuclear Regulatory Commission, "License Amendment Request – Proposed Revision to Technical Specifications in Response to GE Energy - Nuclear 10 CFR Part 21 Safety Communication SC05-03," dated January 15, 2016 (ADAMS Accession No. ML16015A316).

2. Letter from David P. Helker (Exelon Generation Company, LLC) to U.S. Nuclear Regulatory Commission, "Response to Draft Request for Additional Information Regarding Proposed Revision to Technical Specifications in Response to GE Energy - Nuclear 10 CFR Part 21 Safety Communication SC05-03," dated April 19, 2016 (ADAMS Accession No. ML16110A392).

By letter dated January 15, 2016 (Reference 1), Exelon Generation Company, LLC (Exelon) submitted a license amendment request (LAR) for Limerick Generating Station (LGS), Units 1 and 2. The proposed amendment would reduce the reactor vessel steam dome pressure associated with the Technical Specifications (TS) Safety Limits (SLs) specified in TS 2.1.1 and TS 2.1.2. The amendment would also revise the setpoint and allowable value for the main steam line low pressure isolation function in TS Table 3.3.2-2. The proposed changes address a 10 CFR Part 21 issue concerning the potential to violate the SLs during a pressure regulator failure maximum demand (open) (PRFO) transient.

Reference 2 provided a response to a draft request for additional information. Upon review of the response, the NRC staff determined that a copy of GE-Hitachi Nuclear Energy (GEH) Report NEDC-33743P, "BWR Owners' Group Reload Analysis and Core Management Committee SC05-03 Analysis Report," Revision 0, dated April 2012, that was referenced in the response, was required to complete their review. The attachment to this letter provides a copy of the GEH report.

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The GEH report is considered proprietary and confidential, and contains trade secrets. GEH maintains this information on a confidential basis and protects it from disclosure to the general public or unauthorized individuals.

GEH requests that the attachment be withheld from public disclosure pursuant to 10 CFR 2.390(a)(4). An affidavit supporting this request is included in the report. The report is deemed proprietary in its entirety. Thus, a nonproprietary version of this document is not being provided in accordance with the guidance provided in NRC Information Notice 2009-07, "Withholding of Proprietary Information From Public Disclosure," Requirements for Submittals section, which states:

> "…. In instances in which a nonproprietary version would be of no value to the public because of the extent of the proprietary information, the agency does not expect a nonproprietary version to be submitted."

Exelon has reviewed the information supporting a finding of no significant hazards consideration, and the environmental consideration, that were previously provided to the NRC in Attachment 1 of the Reference 1 letter. Exelon has concluded that the information provided in this supplement does not affect the bases for concluding that the proposed license amendment does not involve a significant hazards consideration under the standards set forth in 10 CFR 50.92. In addition, Exelon has concluded that the information in this supplement does not affect the bases for concluding that neither an environmental impact statement nor an environmental assessment needs to be prepared in connection with the proposed amendment.

There are no regulatory commitments in this supplement.

In accordance with 10 CFR 50.91, "Notice for public comment; State consultation," paragraph (b), Exelon is notifying the Commonwealth of Pennsylvania of this supplement by transmitting a copy of this letter without its attachment to the designated State Official.

If you have any questions or require additional information, please contact Glenn Stewart at 610-765-5529.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 9th day of May 2016.

Respectfully,

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

Attachment: GE-Hitachi Nuclear Energy Report NEDC-33743P, "BWR Owners' Group Reload Analysis and Core Management Committee SC05-03 Analysis Report"

cc: Regional Administrator - NRC Region I w/o attachment
NRC Senior Resident Inspector - Limerick Generating Station "
NRC Project Manager, NRR - Limerick Generating Station "
Director, Bureau of Radiation Protection - Pennsylvania Department of Environmental Protection "