



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

August 8, 2016

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 *RBE*
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. MF7541
AND MF7542)

The attached draft request for additional information (RAI) was transmitted on August 1, 2016, to Ms. Stephanie Hanson of Exelon Generation Company, LLC (Exelon, the licensee). This information was transmitted in order to clarify the licensee's license amendment request dated March 29, 2016, for Limerick Generating Station, Units 1 and 2. The proposed amendment would revise the Technical Specification requirements for snubbers.

On August 8, 2016, the licensee indicated that a clarification call to discuss the RAI was not needed. Exelon has agreed to provide a response to RAI by September 6, 2016.

This memorandum and the attachment do not convey or represent an NRC staff position regarding the licensee's request.

Docket Nos. 50-352 and 50-353

Attachment: Draft RAI

DRAFT REQUEST FOR ADDITIONAL INFORMATION
REGARDING PROPOSED LICENSE AMENDMENT
SNUBBER TECHNICAL SPECIFICATION REQUIREMENTS
EXELON GENERATION COMPANY, LLC
LIMERICK GENERATING STATION, UNITS 1 AND 2
DOCKET NOS. 50-352 AND 50-353

By application dated March 29, 2016 (Agencywide Documents Access and Management System (ADAMS) Package Accession No. ML16090A286), 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 revise the Technical Specification (TS) requirements for snubbers.

The Nuclear Regulatory Commission (NRC) staff has reviewed the information the licensee provided that supports the proposed amendment and would like to discuss the following issues to clarify the submittal.

Component Performance, NDE and Testing Branch (EPNB)

Reviewer: Gurjendra Bedi

EPNB-RAI-1

Attachment 2 to the application, "Markup of Technical Specifications Pages," Page No. 3/4 7-12, provides a note stating "The information from Technical Specifications Section 4.7.4.d has been relocated to the Technical Requirements Manual (TRM) Snubbers Section. Technical Specifications Sections 4.7.4.a through 4.7.4.i have been intentionally omitted."

- (a) The snubber program provided in the Attachment 5 is based on the requirements of the ASME OM Code. The ASME OM Code paragraph ISTD-1750 provides Transient Dynamic Events requirements similar to the TS Section 4.7.4.d. Please explain the reason for relocating requirements of TS Section 4.7.4.d to the TRM instead of the proposed Snubber Program.
- (b) The current wording about Sections 4.7.4.a through 4.7.4.i being intentionally omitted provides no information regarding TS page configuration control. Consistent with other previous TS page deletions, it is suggested that the markup for page 3/4 7-12 state that "TECHNICAL SPECIFICATION PAGES 3/4 7-13 THROUGH 7-16 OF THIS SECTION HAVE BEEN INTENTIONALLY OMITTED."

EPNB-RAI-2

Attachment 2 to the application, "Markup of Technical Specification Pages," Page No. 6-14d, shows newly added TS Administrative Control Section 6.8.4.k, "Snubber Program," Item b as follows:

- b. The program shall meet the requirements for ISI of supports set forth in subsequent editions of the Code of Record and addenda of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel (B&PV) Code and the ASME Code for Operation and Maintenance of Nuclear Power Plants (OM Code) that are incorporated by reference in 10 CFR 50.55a, subject to its limitations and modifications, and subject to Commission approval.

Consistent with the current regulations at 10 CFR 50.55a(b)(2) and 10 CFR 50.55a(b)(3), the wording "limitations and modifications," in Item b cited above, should be changed to "conditions."

EPNB-RAI-3

Attachment 4 to the application provides the detail for "TS 4.7.4 Surveillance Requirements Comparison to ASME OM Code Subsection ISTD."

In the comparison Table, under the third column, third paragraph, "Justification for Change," TS 4.7.4.e (page 4 of 9), states that "The revised program provides greater flexibility in permitting testing to be performed during modes other than shutdown. However, as noted in Generic Letter (GL) 91-04:

The staff concludes that the TS need not restrict surveillances as only being performed during shutdown. Nevertheless, safety dictates that when refueling interval surveillances are performed during power operation, licensees give proper regard for their effect on the safe operation of the plant. If the performance of a refueling interval surveillance during plant operation would adversely affect safety, the licensee should postpone the surveillance until the unit is shut down for refueling or is in a condition or mode that is consistent with the safe conduct of that surveillance."

The frequency of inservice examination and testing is specified in the applicable ASME OM Code, Subsection ISTD. Please clarify the use of GL 91-04 for justification of this change."

EPNB-RAI-4

Attachment 4 to the application, Page 2 of 9, TS 4.7.4c, third column, second paragraph references TS 4.5.M.1.b. Please explain the meaning of the referenced TS 4.5.M.1.b, because the current Limerick Units 1 and 2 TSs do not contain TS 4.5.M.1.b.

EPNB-RAI-5

Attachment 5 to the application, "Snubber Program Document," page 1-1, sixth paragraph states, in part, that "The Fourth Interval Snubber Program is divided into three inspection periods as determined by calendar years within the intervals." Please explain the reason for dividing the fourth interval into three periods for snubber examination and testing under the Snubber Program at LGS.

EPNB-RAI-6

Attachment 5 to the application, "Snubber Program Document," Section 3.1 states, in part, "The LGS Class 1, 2 and 3 nonexempt snubbers are those which do not meet the exemption criteria of Paragraph IWF-1230 of ASME Section XI."

Please explain whether the licensee has used the criteria of ASME Section XI, IWF-1230 to exempt snubbers while developing the listings of snubbers provided in Attachments A and B of Attachment 5.

EPNB-RAI-7

Attachment 5 to the application, "Snubber Program Document," Section 3.2.1, fourth paragraph states "Procedure ER-AA-330-004, "Visual Examination of Snubbers," implements the visual examination program for program snubbers. Procedures ER-AA-330-010, "Snubber Functional Testing," and ER-AA-330-11, "Snubber Service Life Monitoring Program," and LGS surveillance test procedures ST-1-103-300-X and ST-1103-990-X are used to implement the functional testing and service life monitoring requirements for the program snubbers.

Please provide the difference between Procedures ER-AA-330-010 and ER-AA-330-11, and LGS surveillance test procedures ST-1-103-300-X and ST-1-103-990-X.

EPNB-RAI-8

Attachment 5 to the application, "Snubber Program Document," Tables 4.1-1 and 4.1-2 provide the frequency for snubber examinations as "Various." Please explain the meaning of a "Various" frequency.

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