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U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
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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, 2017, to June 30, 2018. 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 with the details provided in the attachment.

This report attachment also summarizes one missed regulatory commitment due to an equipment issue.

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,

A handwritten signature in black ink, appearing to read "R. Libra".

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

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 changes were implemented between July 1, 2017, and June 30, 2018, and requires NRC notification.

Commitment change tracking number:	2018-002
CT number:	T04075
Commitment source document:	Unit 2 License Event Report 98-005
Change:	Deleted

Subject:

Weekly surveillance test exceeded Tech Spec period in 1998.

Statement of commitment:

A "read and sign bulletin" addressing this event has been issued to all station personnel who have authorization rights to reschedule/move weekly surveillance tests (ST). Authorized individuals are now required to obtain the ST Coordinator's approval prior to rescheduling a weekly ST. This requirement has been incorporated into the outage section guideline OSG-234, "P3 Scheduling guideline for Daily Work Coordination".

Change to commitment revised as follows:

Deleted.

Justification for change:

WC-AA-111 "Surveillance Program Requirements" is the current governing document. The actions required per WC-AA-111 are more robust than the original commitment description. Operations is required to review the provided surveillance reports as part of shiftly turnovers to ensure that surveillances do not go overdue. Surveillance reports are reviewed daily in the plan of the day meetings. Additional surveillance reports are generated and reviewed as described in Attachment 1 of WC-AA-111.

Missed Commitment:

CT number: T04820
Commitment source document: Response to Generic Letter 88-14
Corrective Action Program Tracking: IR 04061077

Subject:

Monitoring air quality at several points throughout the Instrument Air system.

Statement of commitment:

On a semi-annual basis, ensure the Instrument Air quality is maintained within the requirements of the most current ANSI/ISA standards as measured at the discharge of the air dryers and after-filters. Ensure that the 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, oil vapor, and organic solvent content. The accuracy of alternate air sampling and test methods should be comparable to current requirements in ISO-8573. Air quality at the inlet supply to safety-related and critical components should be maintained within the specifications of equipment vendors.

Reason for missed commitment:

The commitment identifies a semi-annual frequency for air quality tests. The Unit 1 testing was completed. The Unit 2 Instrument Air related testing was also completed. The Unit 2 Instrument Gas System tests could not be completed as scheduled due to system gas leaks within primary containment. During a maintenance outage, a drywell leak inspection was conducted with the leaks identified and repaired.

Following the repair, the Unit 2, 'A' Train Instrument Gas System sample was tested satisfactorily but was past the commitment frequency. The Unit 2, 'B' Train Instrument Gas System sampling was attempted but aborted due to decreasing header pressure. It was identified that the Unit 2 'B' receiver pressure switch requires calibration. The 2B Instrument Gas sampling will be conducted following this repair.