

**From:** Sreenivas, V  
**Sent:** Monday, March 04, 2019 4:37 PM  
**To:** Stewart, Glenn H:(GenCo-Nuc) (Glenn.Stewart@exeloncorp.com)  
**Cc:** Danna, James; Wentzel, Michael; Wrona, David; De Messieres , Candace; Biro, Mihaela; Miller, Ed; Wiebe, Joel  
**Subject:** LIMERICK GENERATING STATION, UNITS 1 AND 2  ACCEPTANCE OF REQUESTED LICENSING ACTION RE: TSTF-505, REVISION 2, "PROVIDE RISK-INFORMED EXTENDED COMPLETION TIMES (EPID L-2018-LLA-0567)"

By letter dated December 13, 2018 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML18347B366), Exelon Generation Company, LLC (the licensee) submitted a license amendment request to amend the Technical Specifications for Limerick Generating Station, Units 1 and 2. The proposed amendments would modify Technical Specification requirements to permit the use of risk-informed completion times in accordance with Technical Specifications Task Force (TSTF) Traveler TSTF-505, Revision 2, "Provide Risk-Informed Extended Completion Times – RITSTF [Risk-Informed TSTF] Initiative 4b," dated July 2, 2018 (ADAMS Accession No. ML18183A493). The purpose of this letter is to provide the results of the NRC staff's acceptance review of this amendment request. The acceptance review was performed to determine if there is sufficient technical information in scope and depth to allow the NRC staff to complete its detailed technical review. The acceptance review is also intended to identify whether the application has any readily apparent information insufficiencies in its characterization of the regulatory requirements or the licensing basis of the plant.

Consistent with Section 50.90 of Title 10 of the *Code of Federal Regulations* (10 CFR), whenever a holder of an operating license under this part desires to amend the license, application for an amendment must be filed with the Commission fully describing the changes requested, and following, as far as applicable, the form prescribed for original applications. Section 50.34 of 10 CFR addresses the content of technical information required. This section stipulates that the submittal address the design and operating characteristics, unusual or novel design features, and principal safety considerations.

The NRC staff has reviewed your application and concluded that it does provide technical information in sufficient detail to enable the NRC staff to complete its detailed technical review and make an independent assessment regarding the acceptability of the proposed amendment in terms of regulatory requirements and the protection of public health and safety and the environment. Given the lesser scope and depth of the acceptance review as compared to the detailed technical review, there may be instances in which issues that impact the NRC staff's ability to complete the detailed technical review are identified, despite completion of an adequate acceptance review. You will be advised of any further information needed to support the NRC staff's detailed technical review by separate correspondence.

By letter dated January 30, 2019 (ADAMS Accession No. ML19030A147), the NRC staff informed the licensee that supplemental information was necessary to enable the staff to make an independent assessment regarding the acceptability of the proposed amendments in terms of regulatory requirements and the protection of public health and safety and the environment.

The licensee provided the requested information by letter dated February 14, 2019 (ADAMS Accession No. ML19045A011).

Based on the information provided in your submittal, the NRC staff has estimated that this request will take approximately 1706 hours to complete, excluding any contractor hours, if appropriate. This estimate reflects the additional resources necessary to review the information provided by letter dated February 14, 2019. Specifically, during the supplemental information submittal clarification call held on January 29, 2019, the licensee was asked to provide an evaluation confirming that its July 2016 facts and observations closure reviews consistent with the NRC-endorsed closure process described in Appendix X to the guidance in NEI 05-04, NEI 07-12, and NEI 12-13 (ADAMS Accession No. ML17086A431). Licensee provided all facts and observations and their proposed resolution or disposition of impact on the TSTF-505 amendment request. The NRC staff expects to complete this amendment review in approximately 18 months from the date of this acceptance resulting in a completion date of September 2020. The NRC staff's initial forecast is based on the estimated effort needed to review the key assumptions and the industry peer review findings and observations resolution and resulting impact on the submittal. Based on the amount of technical specification changes, the estimated effort also includes traditional engineering reviews to ensure that the technical specification changes maintain adequate defense in depth and safety margin and to evaluate changes that may cause a loss of capability to provide the design basis success criteria. If there are emergent complexities or challenges in our review that would cause changes to the initial forecasted completion date or significant changes in the forecasted hours, the reasons for the changes, along with the new estimates, will be communicated during the routine interactions with the assigned project manager.

These estimates are based on the NRC staff's initial review of the application and they could change, due to several factors including requests for additional information, unanticipated addition of scope to the review, and review by NRC advisory committees or hearing-related activities. Additional delay may occur if the submittal is provided to the NRC in advance or in parallel with industry program initiatives or pilot applications.

If you have any questions, please contact me at (301) 415-2597 or [V.Sreenivas@nrc.gov](mailto:V.Sreenivas@nrc.gov).

Docket Nos. 50-352 and 50-353

---

V. Sreenivas, Ph.D., CPM.,  
Project Manager, Limerick and Ginna  
Plant Licensing Branch I  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation