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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, 2018 to June 30, 2019. 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.

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 includes one commitment change summary with the details provided in the attachment.

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 "Frank Sturniolo".

Frank Sturniolo
Vice President – Limerick Generating Station
Exelon Generation Company, LLC

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

The following commitment change was implemented between July 1, 2018 and June 30, 2019 and requires NRC notification.

Commitment change tracking number:	2019-002
CT number:	T03443
Commitment source document:	Reply to NOV 94-21/21 dated 11/7/94
Change:	Deleted

Subject:

Signoffs and Expectations of Steps in Manuals.

Statement of commitment:

Revise the Clearance and Tagging Manual to include expectations for including text steps on the page to which they apply, and to include signoffs for all text steps.

Change to commitment revised as follows:

Deleted.

Justification for change:

The commitment was created at a time when the clearance process was not as mature and computer-based as it is now. The content of this commitment has since become the standard for the process, which is enforced by the fleet-wide computer software.

A "text step" is defined as a tagout step that provides information concerning the tagout but does not necessarily direct component manipulation. While text steps continue to exist, they are physically no different than any other step. The only difference is that the step does not direct an action that requires a tag to be hung on equipment.

No purpose remains to require a text step to be contained on the same page as the step to which it applies, since the text step includes all relevant information including applicable component ID, etc. and is now a standalone step.

The standard computer software enforces each step structure to be the same. Each step requires a signoff, whether a text step or an action step.

No purpose is served by continuing to track this as a commitment. The content of the commitment is now the standard of both the process and the computer software.