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

March 11, 2020

Mr. Bryan C. Hanson
Senior Vice President
Exelon Generation Company, LLC
President and Chief Nuclear Officer
Exelon Nuclear
4300 Winfield Road
Warrenville, IL 60555

SUBJECT: LIMERICK GENERATING STATION, UNITS 1 AND 2 − ISSUANCE OF AMENDMENT NOS. 242 AND 205 RE: REVISE TECHNICAL SPECIFICATIONS TO REMOVE CHLORINE AND TOXIC GAS DETECTION SYSTEM (EPID L-2019-LLA-0166)

Dear Mr. Hanson:

The U.S. Nuclear Regulatory Commission (the Commission) has issued the enclosed Amendment Nos. 242 and 205 to Renewed Facility Operating License Nos. NPF-39 and NPF-85 for the Limerick Generating Station, Units 1 and 2, respectively, in response to your application dated August 1, 2019.

The amendments removed Technical Specification (TS) 3/4.3.7.8.1, “Chlorine Detection System”; TS 3/4.3.7.8.2, “Toxic Gas Detection System”; and Surveillance Requirement 4.7.2.1.e.2, which requires verification of realignment of the control room emergency fresh air supply system upon detection of chorine or toxic gases.

A copy of the related Safety Evaluation is also enclosed. Notice of issuance will be included in the Commission’s biweekly *Federal Register* notice.

Sincerely,

/RA James G. Danna for/

V. Sreenivas, Project Manager
Plant Licensing Branch I
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-352 and 50-353

Enclosures:
1. Amendment No. 242 to Renewed NPF-39
2. Amendment No. 205 to Renewed NPF-85
3. Safety Evaluation

cc: Listserv

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

EXELON GENERATION COMPANY, LLC

DOCKET NO. 50-352

LIMERICK GENERATING STATION, UNIT 1

AMENDMENT TO RENEWED FACILITY OPERATING LICENSE

Amendment No. 242
Renewed License No. NPF-39

1. The U.S. Nuclear Regulatory Commission (the Commission) has found that:

   A. The application for amendment by Exelon Generation Company, LLC (Exelon Generation Company), dated August 1, 2019, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;

   B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;

   C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;

   D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and

   E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, the license is amended by changes to the Renewed Facility Operating License and Technical Specifications as indicated in the attachment to this license amendment.

3. This license amendment is effective as of its date of issuance and shall be implemented within 60 days.

FOR THE NUCLEAR REGULATORY COMMISSION

/RA/

James G. Danna, Chief
Plant Licensing Branch I
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Attachment:
Changes to the Renewed Facility
Operating License and Technical
Specifications

Date of Issuance: March 11, 2020

ATTACHMENT TO LICENSE AMENDMENT NO. 242

LIMERICK GENERATING STATION, UNIT 1

RENEWED FACILITY OPERATING LICENSE NO. NPF-39

DOCKET NO. 50-352

Replace the following page of the Renewed Facility Operating License with the attached revised page. The revised page is identified by amendment number and contains a marginal line indicating the area of change.

Remove Page	Insert Page
3	3

Replace the followings pages of the Appendix A Technical Specifications with the attached revised pages. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change.

Remove Pages	Insert Pages
ix	ix
3/4 3-90	3/4 3-90
3/4 3-91	3/4 3-91
3/4 7-8	3/4 7-8

(2) Pursuant to the Act and 10 CFR Part 70, to receive, possess and to use at any time special nuclear material as reactor fuel, in accordance with the limitations for storage and amounts required for reactor operation, as described in the Final Safety Analysis Report, as supplemented and amended;

(3) Pursuant to the Act and 10 CFR Parts 30, 40 and 70, to receive, possess and use at any time any byproduct, source and special nuclear material as sealed neutron sources for reactor startup, sealed sources for reactor instrumentation and radiation monitoring equipment calibration, and as fission detectors in amounts as required;

(4) Pursuant to the Act and 10 CFR Parts 30, 40, 70, to receive, possess, and use in amounts as required any byproduct, source or special nuclear material without restriction to chemical or physical form, for sample analysis or instrument calibration or associated with radioactive apparatus or components; and

(5) Pursuant to the Act and 10 CFR Parts 30, 40 and 70, to possess, but not separate, such byproduct and special nuclear materials as may be produced by the operation of the facility, and to receive and possess, but not separate, such source, byproduct, and special nuclear materials as contained in the fuel assemblies and fuel channels from the Shoreham Nuclear Power Station.

C. This renewed license shall be deemed to contain and is subject to the conditions specified in the Commission's regulations set forth in 10 CFR Chapter I (except as exempted from compliance in Section 2.D. below) and is subject to all applicable provisions of the Act and to the rules, regulations, and orders of the Commission now or hereafter in effect; and is subject to the additional conditions specified or incorporated below:

(1) Maximum Power Level

Exelon Generation Company is authorized to operate the facility at reactor core power levels not in excess of 3515 megawatts thermal (100% rated power) in accordance with the conditions specified herein and in Attachment 1 to this license. The items identified in Attachment 1 to this renewed license shall be completed as specified. Attachment 1 is hereby incorporated into this renewed license.

(2) Technical Specifications

The Technical Specifications contained in Appendix A and the Environmental Protection Plan contained in Appendix B, as revised through Amendment No. 242, are hereby incorporated into this renewed license. Exelon Generation Company shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

LIMITING CONDITIONS FOR OPERATION AND SURVEILLANCE REQUIREMENTS

Section 3/4.3.7.8.1 (Deleted)

THE INFORMATION FROM THIS TECHNICAL SPECIFICATION
HAS BEEN RELOCATED TO THE TECHNICAL REQUIREMENTS MANUAL (TRM)

Section 3/4.3.7.8.2 (Deleted)

THE INFORMATION FROM THIS TECHNICAL SPECIFICATION
HAS BEEN RELOCATED TO THE TECHNICAL REQUIREMENTS MANUAL (TRM)

SURVEILLANCE REQUIREMENTS (Continued)

e. In accordance with the Surveillance Frequency Control Program by:

1. Verifying that the pressure drop across the combined prefilter, upstream and downstream HEPA filters, and charcoal adsorber banks is less than 6 inches water gauge while operating the subsystem at a flow rate of 3000 cfm ± 10%; verifying that the prefilter pressure drop is less than 0.8 inch water gauge and that the pressure drop across each HEPA is less than 2 inches water gauge.

2. Relocated to the TRM.

3. Verifying that on each of the below radiation isolation mode actuation test signals, the subsystem automatically switches to the radiation isolation mode of operation:

a) Outside air intake high radiation, and

b) Manual initiation from control room.

f. After each complete or partial replacement of a HEPA filter bank by verifying that the HEPA filter bank satisfies the inplace penetration and bypass leakage testing acceptance criteria of less than 0.05% in accordance with ANSI N510-1980 while operating the system at a flow rate of 3000 cfm ± 10%.

g. After each complete or partial replacement of a charcoal adsorber bank by verifying that the charcoal adsorber bank satisfies the inplace penetration and bypass leakage testing acceptance criteria of less than 0.05% in accordance with ANSI N510-1980 for a halogenated hydrocarbon refrigerant test gas while operating the system at a flow rate of 3000 cfm ± 10%.

4.7.2.2 The control room envelope boundary shall be demonstrated OPERABLE:

a. At a frequency in accordance with the Control Room Envelope Habitability Program by performance of control room envelope unfiltered air inleakage testing in accordance with the Control Room Envelope Habitability Program.

UNITED STATES
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EXELON GENERATION COMPANY, LLC

DOCKET NO. 50-353

LIMERICK GENERATING STATION, UNIT 2

AMENDMENT TO RENEWED FACILITY OPERATING LICENSE

Amendment No. 205
Renewed License No. NPF-85

1. The U.S. Nuclear Regulatory Commission (the Commission) has found that:

   A. The application for amendment by Exelon Generation Company, LLC (Exelon Generation Company), dated August 1, 2019, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;

   B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;

   C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;

   D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and

   E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, the license is amended by changes to the Renewed Facility Operating License and Technical Specifications as indicated in the attachment to this license amendment.

3. This license amendment is effective as of its date of issuance and shall be implemented within 60 days.

FOR THE NUCLEAR REGULATORY COMMISSION

/RA/

James G. Danna, Chief
Plant Licensing Branch I
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Attachment:
Changes to the Renewed Facility Operating License and Technical Specifications

Date of Issuance: March 11, 2020

ATTACHMENT TO LICENSE AMENDMENT NO. 205

LIMERICK GENERATING STATION, UNIT 2

RENEWED FACILITY OPERATING LICENSE NO. NPF-85

DOCKET NO. 50-353

Replace the following page of the Renewed Facility Operating License with the attached revised page. The revised page is identified by amendment number and contains a marginal line indicating the area of change.

Remove Page	Insert Page
3	3

Replace the followings pages of the Appendix A Technical Specifications with the attached revised pages. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change.

Remove Pages	Insert Pages
ix	ix
3/4 3-90	3/4 3-90
3/4 3-91	3/4 3-91
3/4 7-7	3/4 7-7

(2) Pursuant to the Act and 10 CFR Part 70, to receive, possess and to use at any time special nuclear material as reactor fuel, in accordance with the limitations for storage and amounts required for reactor operation, as described in the Final Safety Analysis Report, as supplemented and amended;

(3) Pursuant to the Act and 10 CFR Parts 30, 40 and 70, to receive, possess and use at any time any byproduct, source and special nuclear material as sealed neutron sources for reactor startup, sealed sources for reactor instrumentation and radiation monitoring equipment calibration, and as fission detectors in amounts as required;

(4) Pursuant to the Act and 10 CFR Parts 30, 40, 70, to receive, possess, and use in amounts as required any byproduct, source or special nuclear material without restriction to chemical or physical form, for sample analysis or instrument calibration or associated with radioactive apparatus or components; and

(5) Pursuant to the Act and 10 CFR Parts 30, 40 and 70, to possess, but not separate, such byproduct and special nuclear materials as may be produced by the operation of the facility, and to receive and possess, but not separate, such source, byproduct, and special nuclear materials as contained in the fuel assemblies and fuel channels from the Shoreham Nuclear Power Station.

C. This renewed license shall be deemed to contain and is subject to the conditions specified in the Commission's regulations set forth in 10 CFR Chapter I (except as exempted from compliance in Section 2.D. below) and is subject to all applicable provisions of the Act and to the rules, regulations, and orders of the Commission now or hereafter in effect; and is subject to the additional conditions specified or incorporated below:

(1) Maximum Power Level

Exelon Generation Company is authorized to operate the facility at reactor core power levels of 3515 megawatts thermal (100 percent rated power) in accordance with the conditions specified herein.

(2) Technical Specifications

The Technical Specifications contained in Appendix A and the Environmental Protection Plan contained in Appendix B, as revised through Amendment No. 205, are hereby incorporated into this renewed license. Exelon Generation Company shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

LIMITING CONDITIONS FOR OPERATION AND SURVEILLANCE REQUIREMENTS

Section 3/4.3.7.8.1 (Deleted)

THE INFORMATION FROM THIS TECHNICAL SPECIFICATION
HAS BEEN RELOCATED TO THE TECHNICAL REQUIREMENTS MANUAL (TRM)

Section 3/4.3.7.8.2 (Deleted)

THE INFORMATION FROM THIS TECHNICAL SPECIFICATION
HAS BEEN RELOCATED TO THE TECHNICAL REQUIREMENTS MANUAL (TRM)

SURVEILLANCE REQUIREMENTS (Continued)

2. Verifying within 31 days after removal that a laboratory analysis of a representative carbon sample obtained in accordance with Regulatory Position C.6.b of Regulatory Guide 1.52, Revision 2, March 1978, shows the methyl iodide penetration of less than 2.5% when tested in accordance with ASTM D3803-1989 at a temperature of 30°C (86°F) and a relative humidity of 70%.

3. Verifying a subsystem flow rate of 3000 cfm ± 10% during subsystem operation when tested in accordance with ANSI N510-1980.

d. After every 720 hours of charcoal adsorber operation by verifying within 31 days after removal that a laboratory analysis of a representative carbon sample obtained in accordance with Regulatory Position C.6.b of Regulatory Guide 1.52, Revision 2, March 1978, shows the methyl iodide penetration of less than 2.5% when tested in accordance with ASTM D3803-1989 at a temperature of 30°C (86°F) and a relative humidity of 70%.

e. In accordance with the Surveillance Frequency Control Program by:

1. Verifying that the pressure drop across the combined prefilter, upstream and downstream HEPA filters, and charcoal adsorber banks is less than 6 inches water gauge while operating the subsystem at a flow rate of 3000 cfm ± 10%; verifying that the prefilter pressure drop is less than 0.8 inch water gauge and that the pressure drop across each HEPA is less than 2 inches water gauge.

2. Relocated to the TRM

3. Verifying that on each of the below radiation isolation mode actuation test signals, the subsystem automatically switches to the radiation isolation mode of operation:

a) Outside air intake high radiation, and

b) Manual initiation from control room.

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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 242 TO

RENEWED FACILITY OPERATING LICENSE NO. NPF-39 AND

AMENDMENT NO. 205 TO RENEWED FACILITY OPERATING LICENSE NO. NPF-85

EXELON GENERATION COMPANY, LLC

LIMERICK GENERATING STATION, UNITS 1 AND 2

DOCKET NOS. 50-352 AND 50-353

1.0 INTRODUCTION

By letter dated August 1, 2019 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML19213A246), Exelon Generation Company, LLC (the licensee) requested an amendment to the Technical Specifications (TSs) of Renewed Facility Operating License Nos. NPF-39 and NPF-85 for the Limerick Generating Station, Units 1 and 2 (Limerick). The amendments would remove TS 3/4.3.7.8.1, “Chlorine Detection System”; TS 3/4.3.7.8.2, “Toxic Gas Detection System”; and Surveillance Requirement (SR) 4.7.2.1.e.2, which requires verification that the control room emergency air supply subsystem switches to the chlorine isolation mode upon an actuation signal, from the TSs to licensee control. The licensee would relocate these requirements to the Technical Requirements Manual (TRM).

In accordance with the Limerick Updated Final Safety Analysis Report (UFSAR), Section 13.5.3, the TRM is a licensee-controlled procedure described in the UFSAR and, therefore, changes to the TRM are subject to the requirements of Title 10 of the *Code of Federal Regulations* (10 CFR) Section 50.59, “Changes, tests, and experiments.”

2.0 REGULATORY EVALUATION

2.1 Description of the Chlorine and Toxic Gas Detection Systems

The chlorine and toxic gas detection systems ensure that an accidental chlorine and/or toxic gas release will be detected promptly, and the necessary protective actions will be automatically initiated for chlorine, and manually initiated for toxic gas, to provide protection for control room personnel. Upon detection of a high concentration of chlorine, the control room emergency ventilation system will automatically be placed in the chlorine isolation mode of operation to provide the required protection. Upon detection of a high concentration of toxic gas, the control room emergency ventilation system will manually be placed in the chlorine isolation mode of operation to provide the required protection. The detection systems required by these

specifications are consistent with the recommendations of Regulatory Guide 1.95, “Protection of Nuclear Power Plant Control Room Operators against an Accidental Chlorine Release,” dated February 1975.

There are three toxic gas detection subsystems. The high toxic chemical concentration alarm in the main control room annunciates when two of the three subsystems detect a high toxic gas concentration. An “OPERATE/INOP” keylock switch is provided for each subsystem that allows an individual subsystem to be placed in the tripped condition. Placing the keylock switch in the “INOP” position initiates one of the two inputs required to initiate the alarm in the main control room.

2.2 Description of Proposed TS Changes

The proposed changes would remove TS 3/4.3.7.8.1, TS 3/4.3.7.8.2, and SR 4.7.2.1.e.2 from the Limerick TSs and relocate these requirements to the licensee-controlled TRM. Changes may be made by the licensee to the contents of the TRM, subject to the controls of 10 CFR 50.59.

2.3 Regulatory Review

Section 182a of the Atomic Energy Act of 1954, as amended (the Act), requires applicants for nuclear power plant operating licenses to include TSs as part of the application and that these TSs be included as a part of the license. The U.S. Nuclear Regulatory Commission (NRC, the Commission) established its regulatory requirements related to the content of the TSs in 10 CFR 50.36.

The regulations in 10 CFR 50.36 require that the TSs include items in specific categories, including: (1) safety limits, limiting safety system settings, and limiting control settings; (2) limiting conditions for operation (LCOs); (3) SRs; (4) design features; and (5) administrative controls. Further, the regulations state that the Commission may include such additional TSs as it finds appropriate. However, these regulations do not specify the particular TSs that are to be included in a plant’s license.

The Commission has provided guidance for the contents of TSs in its “Final Policy Statement on Technical Specifications Improvements for Nuclear Power Reactors” (Final Policy Statement) (58 FR 39132; July 22, 1993), in which the Commission indicated that compliance with the final policy statement satisfies Section 182a of the Act. The Final Policy Statement identifies criteria to be used in determining whether particular safety functions are required to be included in the TSs. In the final rule codifying these criteria (60 FR 36953; July 19, 1995), the Commission indicated: “Each licensee covered by these regulations may voluntarily use the criteria as a basis to propose the relocation of existing technical specifications that do not meet any of the criteria from the facility license to licensee-controlled documents.” In *Portland General Electric Co.* (Trojan Nuclear Plant), ALAB-531, 9 NRC 263, 273 (1979), the Atomic Safety and Licensing Appeal Board indicated: “technical specifications are to be reserved for those matters as to which the imposition of rigid conditions or limitations upon reactor operation is deemed necessary to obviate the possibility of an abnormal situation or event giving rise to an immediate threat to the public health and safety.”

The regulation in 10 CFR 50.36(c)(2)(ii) requires that a TS LCO be established for each item meeting one or more of the following criteria:

(A) Criterion 1. Installed instrumentation that is used to detect, and indicate in the control room, a significant abnormal degradation of the reactor coolant pressure boundary.

(B) Criterion 2. A process variable, design feature, or operating restriction that is an initial condition of a design basis accident or transient analysis that either assumes the failure of or presents a challenge to the integrity of a fission product barrier.

(C) Criterion 3. A structure, system, or component that is part of the primary success path and which functions or actuates to mitigate a design basis accident or transient that either assumes the failure of or presents a challenge to the integrity of a fission product barrier.

(D) Criterion 4. A structure, system, or component which operating experience or probabilistic risk assessment has shown to be significant to public health and safety.

NUREG-1433, "Standard Technical Specifications, General Electric BWR/4 Plants," Volume 1, Revision 4, "Specifications" (ADAMS Accession No. ML12104A192), contains standard technical specifications (STSs) that meet the above criteria and that may be compared to the Limerick current TSs to provide insights as to which TSs meet the criteria.

3.0 Technical Evaluation

The NRC staff reviewed the licensee-submitted evaluation of Limerick TS 3/4.3.7.8.1, TS 3/4.3.7.8.2, and SR 4.7.2.1.e.2 against the 10 CFR 50.36(c)(2)(ii) TS inclusion criteria. The licensee concluded that these TSs and SR related to the chlorine and toxic gas detection systems could be removed from the Limerick TSs and relocated to the TRM. According to the licensee, these changes would have no effect on plant operation or on any accident mitigation equipment.

To evaluate the licensee's proposed changes, the NRC staff considered whether requirements similar to those present in the Limerick TSs were removed during the development of the STSs. When developing the STSs, the NRC staff applied the TS inclusion criteria to items commonly in TSs prior to the formulation of the Final Policy Statement. At that time, the industry proposed the removal of items from the TSs based on the application of the above four criteria.[1] The NRC staff endorsed the industry's recommendations by letter dated May 9, 1988 (ADAMS Accession No. ML11264A057), which is commonly referred to as the Murley Split Report.

Table 2 of Appendix D to the Murley Split Report applies to this license amendment request, as it contains, "General Electric Standard Technical Specification LCOs which may be Relocated." LCO 3.3.7, Report Item 184, is in that table, which is the "Main Control Room Environmental System (Chlorine and Ammonia) Detection System," that corresponds to both the Limerick,

[1] For the BWR Owners Group, this input was provided by letter dated November 12, 1987, from R. F. Janecek, BWR Owners Group, to R. E. Starostecki, NRC, Subject: "BWR Owners Group Technical Specification Screening Criteria Application and Risk Assessment."

Unit 1 and Unit 2, TS 3/4.3.7.8.1 and TS 3/4.3.7.8.2. The NRC staff also confirmed that the chlorine and toxic gas detection functions do not appear in the corresponding instrumentation table in the STS. Therefore, the NRC staff concludes that TS 3/4.3.8.7.1 and TS 3/4.3.8.7.2 do not meet the TS inclusion criteria and may be removed from the Limerick TSs.

Limerick SR 4.7.2.1.e.2 verifies the realignment of the control room emergency fresh air supply system for the chlorine isolation mode of operation. Because the Limerick chlorine and toxic gas detection instrumentation that indicates such realignment may be removed from the TSs, the NRC staff concludes that this associated SR may also be removed from the TSs.

Requirements removed from the TSs will be placed into the Limerick TRM. The Limerick TRM is a licensee-controlled document described in UFSAR Section 13.5.3. Changes may be made to this document by the licensee subject to the controls of 10 CFR 50.59. The NRC staff finds this level of control appropriate, given that the relocated items do not meet the TS inclusion criteria.

3.1 Technical Conclusion

The NRC staff reviewed the licensee's assessment and the TSs markups and determined that the TSs, as modified by the proposed changes, continue to meet the Commission's requirements of 10 CFR 50.36, and that the TSs, as amended, will continue to provide reasonable assurance of public health and safety. Therefore, the NRC staff finds that the proposed changes to TS 3/4.3.7.8.1, TS 3/4.3.7.8.2, and SR 4.7.2.1.e.2 are acceptable.

4.0 STATE CONSULTATION

In accordance with the Commission's regulations, the NRC staff notified the Pennsylvania State official on December 11, 2019, of the proposed issuance of the amendments. The State official had no comments.

5.0 ENVIRONMENTAL CONSIDERATION

The amendments change requirements with respect to the installation or use of facility components located within the restricted area as defined in 10 CFR Part 20 and change SRs. The NRC staff has determined that the amendments involve no significant increase in the amounts and no significant change in the types of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding, which was published in the *Federal Register* on September 24, 2019 (84 FR 50081), that the amendments involve no significant hazards consideration, and there has been no public comment on such finding. Accordingly, the amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendments.

6.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) there is reasonable assurance that such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the

amendments will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributor: Pete Snyder

Date: March 11, 2020

SUBJECT: LIMERICK GENERATING STATION, UNITS 1 AND 2 − ISSUANCE OF AMENDMENT NOS. 242 AND 205 RE: REVISE TECHNICAL SPECIFICATIONS TO REMOVE CHLORINE AND TOXIC GAS DETECTION SYSTEM (EPID L-2019-LLA-0166) DATED MARCH 11, 2020

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ADAMS Accession No.: ML19345D984 *by memorandum **by e-mail

OFFICE	NRR/DORL/LPL1/PM	NRR/DORL/LPL1/LA	NRR/DSS/STSB/BC**
NAME	VSreenivas	LRonewicz	VCusumano
DATE	12/23/2019	12/19/2019	11/13/2019
OFFICE	OGC – NLO w/edits**	NRR/DORL/LPL1/BC	NRR/DORL/LPL1/PM
NAME	GWachutka	JDanna	VSreenivas (JDanna for)
DATE	01/03/2020	03/11/2020	03/11/2020

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