

LG-20-022

February 18, 2020

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

Limerick Generating Station, Unit 2
Renewed Facility Operating License No. NPF-85
NRC Docket No. 50-353

Subject: Retraction of Licensee Event Report 2017-005-00, Condition Prohibited by TS due to Non-Conservative APRM and Control Rod Block Setpoints.

Reference: Letter from Richard W. Libra (Exelon) to U.S. Nuclear Regulatory Commission, LER 2017-005-00, Condition Prohibited by TS due to Non-Conservative APRM and Control Rod Block Setpoints, Dated July 27, 2017

In accordance with NUREG-1022, Revision 3, Section 5.1.2 Limerick Generating Station (LGS) is cancelling (formally withdrawing) Licensee Event Report (LER) 2017-005-00, submitted to the U.S. Nuclear Regulatory Commission on July 27, 2017 (Reference 1). The LER reported, pursuant to Title 10 Code of Federal Regulations (CFR) 50.73(a)(2)(i)(B), Operation or Condition Prohibited by Technical Specifications. Subsequent to submittal of LER 2017-005-00, Exelon Generation Company, LLC (Exelon) completed a reevaluation of the condition and determined that it did not constitute a reportable condition pursuant to 10 CFR 50.73 and NUREG-1022 guidance.

On May 31, 2017 Exelon identified an increase in the LGS Unit 2 Jet Pump indicated flow resulting from plugging of Jet Pump 9. Based on the increase in the indicated Jet Pump flow, the Average Power Range Monitor (APRM) Simulated Thermal Power (STP) and Control Rod Block setpoints were thought to be non-conservative with respect to TS Tables 2.2.1-1 and 3.3.6-2.

Subsequently, based on an Engineering review supported by an evaluation provided by an offsite vendor, Exelon has concluded that the conditions discussed in the LER did not result in non-conservative APRM high STP or Control Rod Block setpoints. The Reactor Recirculation Drive Flow, not the Jet Pump indicated flow, provides the signal used to develop the flow bias setpoints identified in TS Tables 2.2.1-1 and 3.3.6-2. The measured, Reactor Recirculation Drive Flow is correlated with the Jet Pump flow for use in the Average Power Range Monitor (APRM) Simulated Thermal Power (STP) and Control Rod Block calculations.

The amount of flow diverted through the plugged Jet Pump was within the inherent margin, with respect to the Jet Pump flow correlation. The evaluation concluded that the flow was less conservative, but within the allowable margin, and not non-conservative as stated in the LER. There was no impact on the APRM high STP or Control Rod Block setpoints, and therefore no operation or condition prohibited by Technical Specifications. As a result, Exelon is cancelling (formally withdrawing) LGS LER 2017-005-00.

LG-20-022

There are no commitments contained in this letter.

Should you have any questions or require additional information, contact Robert B. Dickinson at (610) 718-3400.

Respectfully,

A handwritten signature in black ink, appearing to read 'F. Sturniolo', with a stylized flourish at the end.

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

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