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**Subject:** Limerick Units 1 and 2 - ACCEPTANCE REVIEW: TS Change 3.10.8 "Inservice Leak - TSTF-484 (EPIDs: L=2020=LLA=0047)  
**Date:** Wednesday, April 1, 2020 10:03:04 AM

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By letter dated March 18, 2020 (Agencywide Documents Access and Management System (ADAMS) Accession No. [ML20078G307](#)) Exelon Generation Company, LLC, submitted a license amendment request pursuant to Part 50 of Title 10 of the Code of Federal Regulations (10 CFR 50.90) for the Limerick Generating Station, Units 1 and 2 (NPF-39 and NPF-85, respectively). The proposed changes would revise Limiting Condition for Operation (LCO) 3.10.8, and the associated Bases, to expand its scope to include provisions for temperature excursions greater than 212°F as a consequence of inservice leak and hydrostatic testing, and as a consequence of scram time testing initiated in conjunction with an inservice leak or hydrostatic test, while considering operational conditions to be in Operational Condition 4. This change is consistent with Technical Specification Task Force (TSTF) Traveler, TSTF-484, "Use of TS 3.10.1 for Scram Time Testing Activities."

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.

The NRC staff has reviewed your license amendment 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 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. If additional information is needed, you will be advised by separate correspondence.

Based on the information provided in your submittal, the NRC staff has estimated that review of this request will take approximately 162 hours for this license amendment to complete. The NRC staff expects to complete this review in approximately 12 months from acceptance (March 2021). 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 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

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