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

December 1, 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. 250 AND 212 RE: TECHNICAL SPECIFICATION CHANGES RELATED TO INSERVICE TESTING PROGRAM OF SAFETY RELIEF VALVES (EPID L-2019-LLA-0052)

Dear Mr. Hanson:

The U.S. Nuclear Regulatory Commission (the Commission) has issued the enclosed Amendment Nos. 250 and 212 to Renewed Facility Operating License Nos. NPF-39 and NPF-85 for the Limerick Generating Station, Units 1 and 2 (Limerick), respectively, in response to your application dated February 5, 2020, as supplemented by letter dated June 26, 2020.

The amendments revise technical specification (TS) surveillance requirements for testing of the safety relief valves to retain the frequency and certain testing requirements only in the Inservice Testing Program. These changes remove duplication of requirements contained in both the Limerick TSs and the Inservice Testing Program and relocate to the TS bases other requirements not required to be contained in the TSs. The TS bases are a licensee-controlled document. This change is consistent with improved standard TSs, NUREG 1433, Revision 4, "Standard Technical Specifications – General Electric Plants (BWR/4)."

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/

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. 250 to Renewed NPF-39
2. Amendment No. 212 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. 250
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 February 5, 2020, as supplemented by letter dated June 26, 2020, 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 Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.(2) of Renewed Facility Operating License No. NPF-39 is hereby amended to read as follows:

(2) Technical Specifications

The Technical Specifications contained in Appendix A and the Environmental Protection Plan contained in Appendix B, as revised through Amendment No. 250, 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.

3. This license amendment is effective as of its date of issuance and shall be implemented within 90 days.

FOR THE NUCLEAR REGULATORY COMMISSION

James G. Danna

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Date: 2020.12.01 16:08:19 -05'00'

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: December 1, 2020

ATTACHMENT TO LICENSE AMENDMENT NO. 250

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 following page of the Appendix A Technical Specifications with the attached revised page. The revised page is identified by amendment number and contains a marginal line indicating the areas of change.

Remove Page	Insert Page
3/4 4-7	3/4 4-7

(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 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. 250, 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.

3/4.4.2 SAFETY/RELIEF VALVES

LIMITING CONDITION FOR OPERATION

3.4.2 The safety valve function of at least 12 of the following reactor coolant system safety/relief valves shall be OPERABLE with the specified code safety valve function lift settings:*#

4	safety/relief valves @ 1170 psig ±3%
5	safety/relief valves @ 1180 psig ±3%
5	safety/relief valves @ 1190 psig ±3%

APPLICABILITY: OPERATIONAL CONDITIONS 1, 2, and 3.

ACTION:

a. With the safety valve function of one or more of the above required safety/relief valves inoperable, be in at least HOT SHUTDOWN within 12 hours and in COLD SHUTDOWN within the next 24 hours.

b. DELETED

c. DELETED

SURVEILLANCE REQUIREMENTS

4.4.2.1 DELETED

4.4.2.2 Verify the specified safety valve function lift setting of each of the 14 safety/relief valves in accordance with the INSERVICE TESTING PROGRAM requirements of Specification 4.0.5. All safety valves will be recertification tested to meet a ±1% tolerance prior to returning the valves to service.

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* The lift setting pressure shall correspond to ambient conditions of the valves at nominal operating temperatures and pressures.

\# Up to 2 inoperable valves may be replaced with spare OPERABLE valves with lower setpoints until the next refueling.

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

EXELON GENERATION COMPANY, LLC

DOCKET NO. 50-353

LIMERICK GENERATING STATION, UNIT 2

AMENDMENT TO RENEWED FACILITY OPERATING LICENSE

Amendment No. 212
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 February 5, 2020, as supplemented by letter dated June 26, 2020, 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 Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.(2) of Renewed Facility Operating License No. NPF-85 is hereby amended to read as follows:

(2) Technical Specifications

The Technical Specifications contained in Appendix A and the Environmental Protection Plan contained in Appendix B, as revised through Amendment No. 212, 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.

3. This license amendment is effective as of its date of issuance and shall be implemented within 90 days.

FOR THE NUCLEAR REGULATORY COMMISSION

James G. Danna

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Date: 2020.12.01 16:09:29 -05'00'

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: December 1, 2020

ATTACHMENT TO LICENSE AMENDMENT NO. 212

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 following page of the Appendix A Technical Specifications with the attached revised page. The revised page is identified by amendment number and contains a marginal line indicating the areas of change.

Remove Page	Insert Page
3/4 4-7	3/4 4-7

(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. 212, 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.

3/4.4.2 SAFETY/RELIEF VALVES

LIMITING CONDITION FOR OPERATION

3.4.2 The safety valve function of at least 12 of the following reactor coolant system safety/relief valves shall be OPERABLE with the specified code safety valve function lift settings:*#

4	safety/relief valves @ 1170 psig ±3%
5	safety/relief valves @ 1180 psig ±3%
5	safety/relief valves @ 1190 psig ±3%

APPLICABILITY: OPERATIONAL CONDITIONS 1, 2, and 3.

ACTION:

a. With the safety valve function of one or more of the above required safety/relief valves inoperable, be in at least HOT SHUTDOWN within 12 hours and in COLD SHUTDOWN within the next 24 hours.

b. DELETED

c. DELETED

SURVEILLANCE REQUIREMENTS

4.4.2.1 DELETED

4.4.2.2 Verify the specified safety valve function lift setting of each of the 14 safety/relief valves in accordance with the INSERVICE TESTING PROGRAM requirements of Specification 4.0.5. All safety valves will be recertification tested to meet a ±1% tolerance prior to returning the valves to service.

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* The lift setting pressure shall correspond to ambient conditions of the valves at nominal operating temperatures and pressures.

\# Up to 2 inoperable valves may be replaced with spare OPERABLE valves with lower setpoints until the next refueling.

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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 250 TO

RENEWED FACILITY OPERATING LICENSE NO. NPF-39 AND

AMENDMENT NO. 212 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 application dated February 5, 2020 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML20036E488), as supplemented by letter dated June 26, 2020 (ADAMS Accession No. ML20178A514), Exelon Generation Company, LLC (the licensee) submitted a license amendment request to the U.S. Nuclear Regulatory Commission (NRC, the Commission) proposing changes to the technical specifications (TSs) for Limerick Generating Station (Limerick), Units 1 and 2.

The supplemental letter dated June 26, 2020, provided additional information that clarified the license amendment application, did not expand the scope of the application as originally noticed, and did not change the NRC staff's original proposed no significant hazards consideration determination as published in the *Federal Register* on April 21, 2020 (85 FR 22185).

The proposed changes would modify the TS Surveillance Requirement (SR) 4.4.2.2 for testing of the safety relief valves (SRVs) to retain the frequency and certain testing requirements only in the Inservice Testing Program (IST program). These changes will remove duplication of requirements contained in both the TSs and the IST program and relocate to the TS bases other requirements not required to be contained in the TSs. The TS bases is a licensee-controlled document. This change is consistent with improved standard TSs, NUREG 1433, Revision 4, "Standard Technical Specifications – General Electric Plants (BWR/4)."

The proposed changes for the TSs are consistent with Technical Specifications Task Force Traveler, TSTF-545, Revision 3, "TS Inservice Testing Program Removal & Clarify SR Usage Rule Application to Section 5.5 Testing," dated October 21, 2015 (ADAMS Accession No. ML15294A555), which was approved by the NRC for Limerick on May 16, 2017, in Amendment Nos. 225 and 188 (ADAMS Accession No. ML17103A081), and already implemented by the Limerick, Units 1 and 2, TSs.

2.0 REGULATORY EVALUATION

Technical Specifications

The NRC's regulatory requirements related to the content of the TSs are contained in Title 10 of the *Code of Federal Regulations* (10 CFR) Section 50.36, "Technical specifications." Pursuant to 10 CFR 50.36, each operating license issued by the Commission includes TSs and includes items in the following categories: (1) safety limits, limiting safety systems settings, and control settings, (2) limiting conditions for operation (LCOs), (3) SRs, (4) design features, (5) administrative controls, (6) decommissioning, (7) initial notification, and (8) written reports. The regulation in 10 CFR 50.36(c)(3) states that SRs are requirements relating to test, calibration, or inspection to assure that the necessary quality of systems and components is maintained, that facility operation will be within safety limits, and that the LCOs will be met.

Inservice Testing

Pursuant to 10 CFR 50.54, "Conditions of licenses," the applicable requirements of 10 CFR 50.55a are conditions of every nuclear power reactor operating license issued under 10 CFR Part 50. These requirements include inservice testing of pumps and valves at nuclear power reactors in accordance with the American Society of Mechanical Engineers (ASME) Code for Operation and Maintenance of Nuclear Power Plants (OM Code) as specified in 10 CFR 50.55a(b). The regulations in 10 CFR 50.55a(b) state, in part:

> Systems and components of boiling and pressurized water-cooled nuclear power reactors must meet the requirements for preservice and inservice testing (referred to in this paragraph (f) collectively as inservice testing) of the ASME BPV Code and ASME OM Code as specified in this paragraph (f). Each operating license for a boiling or pressurized water-cooled nuclear facility is subject to the following conditions [referring to 10 CFR 50.55a(f)(1) through (f)(6)].

The ASME OM Code is a consensus standard, which is incorporated by reference into 10 CFR 50.55a. During the incorporation process, the NRC staff reviewed the ASME OM Code requirements for technical sufficiency and found that the ASME OM Code IST program requirements were suitable for incorporation into the NRC's rules.

The NRC regulation in 10 CFR 50.55a(f)(5)(ii) states, in part:

> If a revised inservice test program for a facility conflicts with the technical specifications for the facility, the licensee must apply to the Commission for amendment of the technical specifications to conform the technical specifications to the revised program.

The NRC staff reviewed the licensee's application for changes to the TSs. The staff's evaluations and conclusions are summarized below.

3.0 TECHNICAL EVALUATION

3.1 Proposed Technical Specification Changes

Limerick TS SR 4.4.2.2 contains certain testing requirements that are also required by 10 CFR 50.55a(f), "Preservice and inservice testing requirements," and the ASME OM Code.

For Limerick, Units 1 and 2, the licensee is required to perform IST program testing of SRVs in accordance with the ASME OM Code as required by 10 CFR 50.55a(f) or by authorized alternatives pursuant to 10 CFR 50.55a(z). For the fourth IST program 10-year interval, which started on January 8, 2020, the 2012 Edition of the ASME OM Code is used. ASME OM Code (2012 Edition), Mandatory Appendix I, paragraphs I-1320 and I-3310, contain most of the sampling and testing requirements of TS SR 4.4.2.2.

The licensee's application includes a comparison of TS SR 4.4.2.2 for testing of SRVs and ASME OM Code requirements. The comparison indicates which requirements are duplicated and can be removed from the TS SR, which requirements are only in the TS SR and are to be retained in the TS SR, and which are not required by regulation to be in the TSs or the IST program and are to be relocated to TS bases Section 3/4.4.2. The licensee also performed a comparison of the improved standard TSs for SRVs and the ASME OM Code testing requirements that indicates which improved standard TS requirements are not duplicated in the ASME OM Code, and hence, are to be retained in the TSs. The revisions to TS SR 4.4.2.2 retain the duplicated requirements in the IST program, remove the duplication of requirements from the TS SR, and relocate to the TS bases other requirements not required to be contained in the TSs. In accordance with the surveillance frequency control program, the current TS SR 4.4.2.2 testing frequency requirements are replaced with the requirements of the IST program as specified in TS 4.0.5.

3.2 NRC Evaluation

The NRC staff evaluated the licensee's application to determine if the proposed changes are consistent with the guidance, regulations, and licensing information discussed in Section 2.0 of this safety evaluation. In determining whether an amendment to a license will be issued, the Commission is guided by the considerations that govern the issuance of initial licenses to the extent applicable and appropriate. Among the considerations are whether the TSs, as amended, would provide the necessary administrative controls per 10 CFR 50.36(c)(5) (i.e., provisions relating to organization and management, procedures, recordkeeping, review and audit, and reporting necessary to assure operation of the facility in a safe manner). In making its determination as to whether to amend the license, the staff considered those regulatory requirements that are automatically conditions of the license through 10 CFR 50.54. Where the regulations already condition the license, there is no need for a duplicative requirement in the TSs; the regulations provide the necessary reasonable assurance of the health and safety of the public.

The changes to TS SR 4.4.2.2 for testing of the SRVs to retain the frequency and certain testing requirements for SRVs only in the IST program, including updated TS 4.0.5, and to relocate to the TS bases other requirements not required to be contained in the TSs, will remove duplication of requirements contained in both the Limerick TSs and the IST program, and are consistent with the requirements of 10 CFR 50.36(c).

The licensee will retain a current Limerick TS SR 4.4.2.2 testing requirement that all 14 SRVs are set pressure tested to verify the valves are within the existing tolerance of the safety valve function lift setting. This is consistent with the requirements in 10 CFR 50.36(c)(3), which specify that TSs include SRs relating to test, calibration, or inspection, to assure that the necessary quality of systems and components is maintained, that facility operation will be within safety limits, and that the LCOs will be met.

The NRC staff reviewed the licensee's request and determined the proposed changes to TS SR 4.4.2.2 are acceptable because these SRs will continue to be performed in accordance with the requirements of 10 CFR 50.55a(f), and the requirements of 10 CFR 50.36(c)(3) continue to be met, as the modified SR assures the required testing is performed to maintain the design function of the overpressure protection function provided by the SRVs.

4.0 STATE CONSULTATION

In accordance with the Commission's regulations, the NRC staff notified the Pennsylvania State official on September 11, 2020, 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 April 21, 2020 (85 FR 22185), 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 Contributors: A. Russell
G. Bedi

Date: December 1, 2020

SUBJECT: LIMERICK GENERATING STATION, UNITS 1 AND 2 − ISSUANCE OF AMENDMENT NOS. 250 AND 212 RE: TECHNICAL SPECIFICATION CHANGES RELATED TO INSERVICE TESTING PROGRAM OF SAFETY RELIEF VALVES (EPID L-2019-LLA-0052) DATED DECEMBER 1, 2020

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