

10 CFR 50.90  
10 CFR 50.69

April 1, 2021

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

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: Supplement - Application to Implement an Alternate Defense-in-Depth Categorization Process, an Alternate Pressure Boundary Categorization Process, and an Alternate Seismic Tier 1 Categorization Process in Accordance with the Requirements of 10 CFR 50.69, "Risk-Informed Categorization and Treatment of Structures, Systems and Components for Nuclear Power Reactors"

- References:
1. Exelon Generation Company, LLC letter to the U.S. Nuclear Regulatory Commission, Limerick Generating Station, Units 1 and 2, "Application to Implement an Alternate Defense-in-Depth Categorization Process, an Alternate Pressure Boundary Categorization Process, and an Alternate Seismic Tier 1 Categorization Process in Accordance with the Requirements of 10 CFR 50.69, 'Risk-Informed Categorization and Treatment of Structures, Systems and Components for Nuclear Power Reactors,'" dated March 11, 2021 (ADAMS Accession No. ML21070A412).
  2. Pressurized Water Reactor Owners Group letter OG-21-69 to the U.S. Nuclear Regulatory Commission, "For Information Only – Transmittal of PWROG-20015-NP Revision 1 'Alternate 10 CFR 50.69 Defense-in-Depth Categorization Process,'" dated March 23, 2021 (ADAMS Accession Nos. ML21082A521 and ML21082A522).

By Reference 1, Exelon Generation Company, LLC (Exelon) submitted an application for amendment of the Renewed Facility Operating License Nos. NPF-39 and NPF-85 for Limerick Generating Station (Limerick), Units 1 and 2, respectively.

The proposed amendments would modify the licensing basis by revising the license condition in Appendix C to allow the use of an alternate defense-in-depth categorization process, an alternate pressure boundary categorization process, and an alternate Seismic Tier 1 categorization process for implementation of the risk-informed categorization and treatment of structures, systems and components for Limerick in accordance with the requirements of 10 CFR 50.69.

This letter is a supplement to the Reference 1 application for amendment. The basis for the alternate defense-in-depth categorization process described in the Limerick 50.69 alternative categorization license amendment request (LAR) (Reference 1) is Pressurized Water Reactor

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Owners Group (PWROG) document PWROG-20015-NP, Revision 0, "Alternate 10 CFR 50.69 Defense-in-Depth Categorization Process."

In Reference 2, the PWROG submitted PWROG-20015-NP, Revision 1, to the NRC for information purposes only to support NRC review of the Limerick 50.69 alternative categorization LAR. As noted in Reference 2, PWROG-20015-NP, Revision 1, is exactly the same as PWROG-20015-NP, Revision 0, except that the Export Control language has been removed from Page 2 of the report. The technical content of the report has not been changed.

Therefore, Exelon requests that Revision 0 of the PWROG report referenced in the Limerick LAR be superseded by Revision 1 of the PWROG report, and that the NRC use PWROG-20015-NP, Revision 1 to perform its review of the Limerick 50.69 alternative categorization LAR.

Exelon has reviewed the information supporting the No Significant Hazards Consideration and the Environmental Consideration that was previously provided to the NRC in Reference 1. The information in this LAR supplement does not impact the conclusion that the proposed license amendment does not involve a significant hazards consideration. The information also does not impact the conclusion that there is no need for an environmental assessment to be prepared in support of the proposed amendment.

There are no regulatory commitments contained in this supplement.

In accordance with 10 CFR 50.91, "Notice for public comment; State consultation," paragraph (b), Exelon is notifying the Commonwealth of Pennsylvania of this license amendment request supplement by transmitting a copy of this letter to the designated State Official.

If you should have any questions regarding this submittal, please contact Glenn Stewart at 610-765-5529.

I declare under penalty of perjury that the foregoing is true and correct. Executed on this 1<sup>st</sup> day of April 2021.

Respectfully,



David P. Helker  
Sr. Manager - Licensing and Regulatory Affairs  
Exelon Generation Company, LLC

cc: USNRC Region I, Regional Administrator  
USNRC Project Manager, LGS  
USNRC Senior Resident Inspector, LGS  
Director, Bureau of Radiation Protection - Pennsylvania Department  
of Environmental Protection