

From: [Sreenivas, V](#)
To: [Stewart, Glenn H:\(GenCo-Nuc\) \(Glenn.Stewart@exeloncorp.com\)](#); [Helker, David P:\(GenCo-Nuc\)](#)
Cc: [Danna, James](#); [Pascarelli, Robert](#); [Rosenberg, Stacey](#); [Robinson, Jay](#); [Buford, Angie](#); [Neuhausen, Alissa](#); [Curran, Gordon](#); [Bedi, Guriendra](#); [Hsu, Kaihwa](#); [Circle, Jeff](#); [Biro, Mihaela](#); [Tetter, Keith](#); [Li, Ming](#); [Wyman, Steve](#); [Miller, Ed](#); [Grenier, Bernard](#)
Subject: LIMERICK GENERATING STATION, UNITS 1 AND 2-ACCEPTANCE OF REQUESTED LICENSING ACTION RE: Revision to Appendix C License Conditions in Accordance with the Requirements of 10 CFR 50.69
Date: Wednesday, May 19, 2021 1:57:00 PM
Attachments: [image002.png](#)

SUBJECT: LIMERICK GENERATING STATION, UNITS 1 AND 2-ACCEPTANCE OF REQUESTED LICENSING ACTION: Revision to Appendix C License Conditions in Accordance with the Requirements of 10 CFR 50.69-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" (EPID: L-2021-LLA-0042).

By letter dated March 11, 2021, (Agencywide Documents Access and Management System (ADAMS) Accession No. [ML21070A412](#)), Exelon Generation Company, LLC (Exelon, the licensee) submitted a license amendment request (LAR) for the Limerick Generating Station, Units 1 and 2. The proposed amendments would revise the licensing basis by modifying the license condition related to implementation of the provisions of Title 10 of the Code of Federal Regulations (10 CFR) Section 50.69, "Risk-Informed Categorization and Treatment of Structures, Systems and Components for Nuclear Power Reactors". The proposed revision would implement an alternate defense-in-depth categorization process, an alternate pressure boundary categorization process, and an alternate seismic tier 1 categorization process.

By letter dated April 20, 2021 (ADAMS Accession No. [ML21111A031](#)), the U.S. Nuclear Regulatory Commission (NRC) staff informed the licensee that supplemental information was necessary to enable the staff to make an independent assessment regarding the acceptability of the proposed amendments in terms of regulatory requirements and the protection of public health and safety and the environment. The licensee provided the requested information by letter dated May 5, 2021 (ADAMS Accession No. [ML21125A215](#)).

The purpose of this letter is to provide the results of the NRC staff's acceptance review of this amendment request. 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.

Consistent with 10 CFR 50.69, an amendment to the license (including the technical specifications) must fully describe the changes requested, and following, as far as applicable, the form prescribed for original applications. Section 50.34 of 10 CFR addresses the content of technical information required. This section stipulates that the submittal address the design and operating characteristics, unusual or novel design

features, and principal safety considerations.

The NRC staff has reviewed your 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 independent 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. You will be advised of any further information needed to support the NRC staff's detailed technical review by separate correspondence.

Based on the information provided in your submittal, the NRC staff has estimated that this request will take approximately 940 hours to complete. The NRC staff expects to complete this review by May 19, 2022, 12 months from the date of this acceptance. 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, and the contractor resources will be communicated during the routine interactions with the assigned 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.

V. Sreenivas, Ph.D., CPM.,
Project Manager, Limerick and Ginna
Plant Licensing Branch I
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation