



**UNITED STATES  
NUCLEAR REGULATORY COMMISSION**  
REGION I  
2100 RENAISSANCE BOULEVARD, SUITE 100  
KING OF PRUSSIA, PENNSYLVANIA 19406-2713

August 24, 2021

Mr. David P. Rhoades  
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 – SECURITY BASELINE  
INSPECTION REPORT 05000352/2021402 AND 05000353/2021402**

Dear Mr. Rhoades:

On August 19, 2021, the U.S. Nuclear Regulatory Commission (NRC) completed an inspection at Limerick Generating Station, Units 1 and 2 and discussed the results of this inspection with Mr. Frank Sturniolo, Site Vice President, and other members of your staff. The results of this inspection are documented in the enclosed report.

No findings or violations of more than minor significance were identified during this inspection.

This letter, its enclosure, and your response (if any) will be made available for public inspection and copying at <http://www.nrc.gov/reading-rm/adams.html> and at the NRC Public Document Room in accordance with Title 10 of the *Code of Federal Regulations* 2.390, "Public Inspections, Exemptions, Requests for Withholding."

Sincerely,

Fred L. Bower, III, Chief  
Security, Emergency Preparedness and Incident  
Response Branch  
Division of Radiological Safety and Security

Docket Nos. 05000352 and 05000353  
License Nos. NPF-39 and NPF-85

Enclosure:  
As stated

cc w/ encl: Distribution via LISTSERV®

SUBJECT: LIMERICK GENERATING STATION, UNITS 1 AND 2 – SECURITY BASELINE  
INSPECTION REPORT 05000352/2021402 AND 05000353/2021402 DATED  
AUGUST 24, 2021

**DISTRIBUTION:**

JGreives, DORS  
 LCasey, DORS  
 TCorcoran, DORS  
 EGarcia, DORS  
 AZiedonis, DORS, SRI  
 SHaney, DORS, RI  
 NEsch, DORS, AA  
 AMcCraw, RI OEDO  
 RidsNrrPMLimerick Resource  
 RidsNrrDorlLp1 Resource  
 ROPreports Resource  
 DJohnson, NSIR  
 TKeene, NSIR  
 ABowers, NSIR  
 NSimonian, NSIR  
 EWharton, NSIR  
 JJustice, NSIR  
 FSullivan, NSIR  
 FBower, DRSS, RI  
 JWorosilo, DRS, RII  
 SOrth, DRS, RIII  
 RKellar, DRS, RIV  
 RidsNsrDso Resource

DOCUMENT NAME: <https://usnrc.sharepoint.com/teams/RIDRSPSBSEC/Shared Documents/Inspection Reports/2021 IR Final/Limerick/Limerick BI IR 2021-402.docx>

**ADAMS ACCESSION NUMBER: ML21236A227**

<input checked="" type="checkbox"/> SUNSI Review		<input checked="" type="checkbox"/> Non-Sensitive <input type="checkbox"/> Sensitive		<input checked="" type="checkbox"/> Publicly Available <input type="checkbox"/> Non-Publicly Available	
OFFICE	RI/DRSS	RI/DRSS	RI/DORS	RI/DRSS	
NAME	KHussar	DCaron/KHussar for	JGreives	FBower	
DATE	8/24/21	8/24/21	8/24/21	8/24/21	

OFFICIAL RECORD COPY

**U.S. NUCLEAR REGULATORY COMMISSION  
Inspection Report**

Docket Numbers: 05000352 and 05000353

License Numbers: NPF-39 and NPF-85

Report Numbers: 05000352/2021402 and 05000353/2021402

Enterprise Identifier: I-2021-402-0069

Licensee: Exelon Generation Company, LLC

Facility: Limerick Generating Station, Units 1 and 2

Location: Sanatoga, PA

Inspection Dates: August 16, 2021 to August 19, 2021

Inspectors: D. Caron, Senior Physical Security Inspector  
K. Hussar, Senior Physical Security Inspector

Approved By: Fred L. Bower, III, Chief  
Security, Emergency Preparedness and Incident Response Branch  
Division of Radiological Safety and Security

Enclosure

## **SUMMARY**

The U.S. Nuclear Regulatory Commission (NRC) continued monitoring the licensee's performance by conducting a security baseline inspection at Limerick Generating Station, Units 1 and 2, in accordance with the Reactor Oversight Process. The Reactor Oversight Process is the NRC's program for overseeing the safe operation of commercial nuclear power reactors. Refer to <https://www.nrc.gov/reactors/operating/oversight.html> for more information.

### **List of Findings and Violations**

No findings or violations of more than minor significance were identified.

### **Additional Tracking Items**

None.

## **INSPECTION SCOPES**

Unless otherwise noted, baseline security inspections were conducted in accordance with the appropriate portions of the inspection procedures (IPs) in effect at the beginning of the inspection. Samples were declared complete when the IP requirements most appropriate to the inspection activity were met consistent with Inspection Manual Chapter 2201, "Security Inspection Program for Commercial Nuclear Power Reactors." The inspectors reviewed selected procedures and records, observed activities, and interviewed personnel to assess licensee performance and compliance with Commission rules and regulations, license conditions, site procedures, and standards. Publicly available IPs are located at:

<http://www.nrc.gov/reading-rm/doc-collections/insp-manual/inspection-procedure/index.html>.

The inspectors reviewed selected procedures and records, observed activities, and interviewed personnel to assess licensee performance and compliance with Commission rules and regulations, license conditions, site procedures, and standards. Starting on March 20, 2020, in response to the National Emergency declared by the President of the United States on the public health risks of the coronavirus (COVID-19), inspectors were directed to begin telework. In addition, regional baseline inspections were evaluated to determine if all or a portion of the objectives and requirements stated in the IP could be performed remotely. If the inspections could be performed remotely, they were conducted per the applicable IP. In some cases, portions of an IP were completed remotely and on site. The inspections documented below met the objectives and requirements for completion of the IP.

In response to the COVID-19 Public Health Emergency declared on January 31, 2020, by the Secretary of the United States Department of Health and Human Services on the public health risks of the coronavirus, Limerick Generating Station pursued an exemption to security officer training and requalification requirements (ML20211L699). In addition to these exemptions, licensees implemented additional actions or alternatives allowed in response to health concerns within existing regulatory guidance available in Regulatory Guide 5.75 to ensure annual Force on Force exercises were conducted as safely as possible while maintaining the requirements to simulate as closely as practicable site specific conditions and minimizing the number and effects of artificialities associated with these exercises (Part 73, Appendix B, VI.C.3).

## **SAFEGUARDS**

### 71130.05 - Protective Strategy Evaluation

The inspectors evaluated the licensee's protective strategy through completion of the following procedure elements:

#### Protective Strategy Evaluation (1 Sample)

- (1) The inspectors observed an annual Force on Force exercise to verify implementation of the Performance Evaluation Program sample.

## **INSPECTION RESULTS**

No findings were identified.

## **EXIT MEETINGS AND DEBRIEFS**

The inspectors verified no proprietary information was retained or documented in this report.

- On August 19, 2021, the inspectors presented the security baseline inspection results to Mr. Frank Sturniolo, Site Vice President, and other members of the licensee staff.

**DOCUMENTS REVIEWED**

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
71130.05	Procedures	SY-AA-101-132	Security Assessment and Response to Unusual Activities	Revision 32