

March 25, 2022

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 to Review of Limerick Generating Station Defense in Depth and Diversity Common Cause Failure Coping Analysis, WNA-AR-01074-GLIM-P, Rev 1, February 2022

- References:
1. CEG Slides for Pre-submittal Meeting, "Limerick Generating Station Digital Modernization Project LAR Technical Specifications Changes," dated January 11, 2022 (ADAMS Accession No. ML22010A069)
 2. NRC Standard Review Plan Branch Technical Position 7-19, "Guidance for Evaluation of Defense-in-Depth and Diversity to Address Common Cause Failure due to Latent Design Defects in Digital Safety Systems," Revision 8, dated January 2021
 3. Constellation Energy Generation, LLC letter to the U.S. Nuclear Regulatory Commission, Limerick Generating Station, Units 1 and 2, "Review of Limerick Generating Station Defense in Depth and Diversity Common Cause Failure Coping Analysis, WNA-AR-01074-GLIM-P, Rev 1, February 2022, dated February 14, 2022 (ADAMS Accession No. ML22046A003)
 4. Email from Michael Marshall (U.S. Nuclear Regulatory Commission) to Frank Mascitelli (Constellation Energy Generation, LLC), "List of Acceptance Issues and Questions re Limerick D3 Analysis (L-2022-LLT-0000), dated March 16, 2022
 5. Meeting with Constellation Energy Generation, LLC Regarding Defense-in-Depth and Diversity Common Cause Failure Coping Analysis Request for Limerick Generating Station, Units 1 and 2. March 21, 2022 (ADAMS Accession No. ML22076A021)

In Reference 1, during final discussion of next steps in an NRC Pre-submittal Meeting conducted on January 11, 2022, Constellation Energy Generation, LLC (CEG) (previously Exelon Generation Company, LLC) informed the NRC of the intent to submit a Defense in Depth and Diversity (D3) Coping Analysis prior to the submittal of its associated License Amendment Request (LAR) for the Limerick Generating Station, Units 1 and 2 (LGS) Digital

Review of LGS D3 Coping Analysis
LGS Digital Modernization Project
Docket Nos. 50-352 and 50-353
March 25, 2022
Page 2

Modernization Project. The purpose was to facilitate future pre-submittal discussions and to improve NRC staff technical review time post-LAR submittal.

In Reference 3, Constellation Energy Generation, LLC (CEG) requested approval of the LGS Defense in Depth and Diversity Common Cause Failure Coping Analysis, WNA-AR-01074-GLIM-P, Rev 1, February 2022 Report (D3 Coping Analysis), which was prepared in accordance with Reference 2, by August 14, 2022.

Pursuant to References 4 and 5, NRC requested a meeting to discuss the Acceptance Review of the D3 Coping Analysis.

This letter is a response to References 4 and 5. After reviewing the apparent information insufficiencies and questions that could potentially become requests for additional information presented and discussed in the March 21, 2022 teleconference meeting, CEG withdraws the request to complete the review of the D3 Coping Analysis by August 14, 2022 and hereby modifies the request such that a separate SER and approval will not be necessary. CEG acknowledges that the D3 Coping Analysis is part of the LAR review and NRC can continue to review the D3 Coping Analysis and provide timely feedback to CEG without requiring D3 Coping Analysis approval.

CEG is currently planning to submit the LGS Digital Modernization Project LAR in the late August 2022 timeframe. The LAR will contain the D3 Coping Analysis and will address the identified acceptance review and technical issues identified during the Acceptance Review meeting conducted on March 21, 2022.

There are no regulatory commitments contained in this review request.

If you have any questions regarding this submittal, please contact Frank Mascitelli at 610-765-5512.

I declare under penalty of perjury that the foregoing is true and correct. Executed on this 25th day of March 2022.

Respectfully,



David P. Helker
Sr. Manager, Licensing
Constellation Energy Generation, LLC

cc: Regional Administrator - NRC Region I
NRC Senior Resident Inspector - Limerick Generating Station
NRC Project Manager, NRR - Limerick Generating Station
Director, Bureau of Radiation Protection - Pennsylvania Department
of Environmental Protection