

From: [Marshall, Michael](#)
To: [Mascitelli, Francis J:\(Constellation Nuclear\)](#)
Cc: [Jain, Bhagwat](#); [Pareez Golub](#); [Helker, David P:\(Constellation Nuclear\)](#)
Subject: RESPONSE: Review and Feedback on Draft Limerick Digital License Amendment Request (L-2020-LRM-0041)
Date: Friday, June 17, 2022 11:20:00 AM

Hello Frank,

During a public meeting between the NRC and Constellation on June 9, 2022, Constellation asked the NRC staff whether the NRC staff would review and provide feedback within 30 days on a draft of the planned Limerick digital instrumentation and controls license amendment request that Constellation plans to submit to the NRC by the end of August 2022. Earlier this week you asked whether the draft needed to be “formally” submitted to the NRC via the “docket.” The NRC staff did not ask Constellation for a draft copy of the planned Limerick digital instrumentation and controls license amendment request. Yes, the NRC staff will provide feedback (i.e., observations and comments) on the draft of the Limerick digital instrumentation and controls license amendment request 30 days after receipt of the draft. Yes, Constellation’s request for feedback on the draft and the draft should be submitted to the “docket” by the normal means of providing correspondence to the NRC. The draft Waterford license amendment request mentioned by Constellation during the June 9th meeting was provided on the docket and a copy is available in the NRC’s document management system under ADAMS Accession No. [ML20168A904](#).

Please note the following:

- The NRC does not have an established process for providing feedback to licensees on draft operating reactor license amendment requests.
- The NRC staff is advised to “discourage licensees and applicants from submitting drafts of routine licensing correspondence for review.” In cases the NRC staff does review draft information,
 - NRC staff will refrain from assuming role of advisor or consultant.
 - NRC staff’s comments will be limited to addressing issues concerning regulatory decision making, regulatory or industry guidance, or editorial and formatting suggestions that would facilitate staff review.
 - NRC staff comments on detailed technical content may not be appropriate.
 - NRC staff will refrain from providing comments that would give more of an advantage to one licensee or applicant than to any other.
- The NRC staff’s review and feedback on the draft license amendment request is not direction from the NRC staff to Constellation to update the draft license amendment request before it is submitted to the NRC.
- The NRC staff’s review of the draft license amendment request is not a substitute for either an acceptance review or detailed technical review normally performed by the NRC staff.

The lack of NRC staff's comments on a particular aspect of the draft license amendment request does not mean that the NRC staff will not identify issues during either the acceptance review or the detailed technical review by the NRC staff.

- The NRC staff may not review the draft license amendment request in its entirety.

The request from Constellation to review the draft, the draft, and NRC staff's feedback on the draft will be handled as official agency records. Therefore, they will be placed in the NRC's document management system, ADAMS. The NRC does not rely on draft material when making regulatory decisions. If you have any additional questions, please feel free to contact me.

Best Regards,
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