



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

August 25, 2022

Mr. David P. Rhoades  
Senior Vice President  
Constellation Energy Generation, LLC  
President and Chief Nuclear Officer  
Constellation Nuclear  
4300 Winfield Road  
Warrenville, IL 60555

SUBJECT: LIMERICK GENERATING STATION, UNITS 1 AND 2 - SUMMARY OF  
JUNE 24, 2022, PUBLIC OBSERVATION MEETING WITH CONSTELLATION  
ENERGY GENERATION, LLC RE: PROPOSED LICENSE AMENDMENT  
REQUEST TO MODIFY 10 CFR 50.69 LICENSE CONDITIONS  
(EPID L-2021-LLA-0042)

Dear Mr. Rhoades:

On June 24, 2022, the U.S. Nuclear Regulatory Commission (NRC) staff held a virtual public meeting with representatives from Constellation Energy Generation, LLC.<sup>1</sup> The purpose of the meeting was to discuss Constellation's planned response to NRC's request for additional information (RAI)<sup>2</sup> relating to Constellation's license amendment request (LAR)<sup>3</sup> for Limerick Generating Station, Units 1 and 2. Constellation requested in its LAR to modify the existing Limerick license conditions for Title 10 of the *Code of Federal Regulations*, Section 50.69 (10 CFR 50.69), "Risk-informed categorization and treatment of structures, systems and components for nuclear power reactors." The amendments would allow Constellation to use alternative defense-in-depth (DID), pressure boundary, and seismic categorization processes for treatment of systems, structures, and components per 10 CFR 50.69. The enclosure to this summary contains a list of attendees.

The licensee discussed its proposed responses to RAIs 9, 10, and 11, and 12 pertaining to its DID categorization process. As part of its response to RAI-9.A, the licensee informed the NRC staff that it is now using PWROG-20015-NP, Revision 3 in lieu of Revision 3B, which was posted earlier to the audit portal. In RAI-9.D, the licensee stated that it is using RG 1.200, Revision 2.

The licensee discussed its intent to withdraw the containment (large early release frequency) portion of the proposed DID categorization process via its response to RAI-12 and to continue using NEI 00-04<sup>4</sup> for its containment approach.

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<sup>1</sup> The meeting notice and agenda, dated June 22, 2022, are available in Agencywide Documents Access and Management System (ADAMS) under Accession No. ML22175A098.

<sup>2</sup> The RAI, dated April 19, 2022, is available in ADAMS under ML22103A254.

<sup>3</sup> ML21070A412, dated March 11, 2021

<sup>4</sup> NEI 00-04, "10 CFR 50.69 SSC Categorization Guideline," Revision 0, July 2005 (ML052910035)

Regarding the NRC staff's questions on the role of the integrated decisionmaking panel (IDP) in the overall 10 CFR 50.69 categorization process (e.g., increased number of structures, systems, and components (SSCs) that would be categorized as low safety significant per the proposed alternative DID categorization process, apparent increased reliance on the IDP), the licensee stated that the IDP would require reviews from its engineering organization. In response to the staff concerns on over-reliance of the IDP, the licensee introduced a review by the engineering team as an additional step in the process.

The NRC staff did not make any regulatory decisions or commitments at the meeting. The enclosure to this summary lists members from the public that attended the meeting. The NRC staff did not receive any public meeting feedback forms. Please direct any inquiries to me at 301-415-0489 or by e-mail to [Audrey.Klett@nrc.gov](mailto:Audrey.Klett@nrc.gov).

Sincerely,

*/RA/*

Audrey L. Klett, Senior Project Manager  
Plant Licensing Branch I  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket Nos. 50-352 and 50-353

Enclosure:  
List of Attendees

cc: Listserv

**Enclosure**

**List of Attendees**

LIST OF ATTENDEES  
JUNE 24, 2022, VIRTUAL PUBLIC MEETING  
WITH CONSTELLATION ENERGY GENERATION, LLC  
LIMERICK GENERATING STATION, UNITS 1 AND 2

<b><u>U.S. Nuclear Regulatory Commission</u></b>	<b><u>Constellation Energy Generation, LLC</u></b>
Mihaela Biro, NRR <sup>1</sup> /DRA <sup>2</sup> /APLA <sup>3</sup>	Stephen Flickinger
Jeff Circle, NRR/DRA/APLA	Roy R. Linthicum
Jim Danna, NRR/DORL <sup>4</sup> /LPL <sup>5</sup>	Suzanne Loyd
Audrey Klett, NRR/DORL/LPL1	Ashley Rickey
Ed Miller, NRR/DORL/LPL2-1 <sup>6</sup>	Jeffrey Stone
Bob Pascarelli, NRR/DRA/APLA	
V Sreenivas, NRR/DORL/LPL1	<b><u>Jensen Hughes</u></b>
Shilp Vasavada, NRR/DRA/APLC <sup>7</sup>	Brian Nolan
Steve Short, PNNL <sup>8</sup>	David Passehl
Mark Wilk, PNNL	Charles Young
<b><u>Members of the Public</u></b>	<b><u>Westinghouse</u></b>
Bradley Dolan, Tennessee Valley Authority	Richard W. Rolland, III
Alfred Hyde, Dominion Contractor	
Mary Miller, Dominion Contractor	<b><u>Electric Power Research Institute</u></b>
	Doug Kull
	Patrick O'Regan

<sup>1</sup> Office of Nuclear Reactor Regulation

<sup>2</sup> Division of Risk Assessment

<sup>3</sup> Probabilistic Risk Assessment Branch A

<sup>4</sup> Division of Operating Reactor Licensing

<sup>5</sup> Plant Licensing Branch I

<sup>6</sup> Plant Licensing Branch II-1

<sup>7</sup> Probabilistic Risk Assessment Branch C

<sup>8</sup> Pacific Northwest National Laboratory (NRC contractor)

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 (EPID L-2021-LLA-0042) DATED AUGUST 25, 2022

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**ADAMS Accession No.: ML2227A111**

OFFICE	NRR/DORL/LPL1/PM	NRR/DORL/LPL1/LA	NRR/DRA/APLA/BC
NAME	AKlett	KZelenock	RPascarelli
DATE	08/15/2022	08/16/2022	08/15/2022
OFFICE	NRR/DORL/LPL1/BC	DORL/LPL1/PM	
NAME	HGonzalez	AKlett	
DATE	08/22/2022	08/25/2022	

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