

**From:** Audrey Klett  
**Sent:** Friday, July 21, 2023 9:17 AM  
**To:** Flickinger, Stephen F:(Constellation Nuclear)  
**Cc:** Elena Herrera Torres  
**Subject:** NRC Request for Additional Information Re. TSTF-477 LAR (EPID L-2022-LLA-0174)  
**Attachments:** RAI 1-3 for TSTF-477 LAR.docx

Hi Steve,  
Attached are NRC's RAIs 1-3 for the subject LAR. Per our email earlier today, NRC is requesting the licensee to respond to these RAIs on or by August 18, 2023.

Thanks,

Audrey Klett, Senior Project Manager  
U.S. Nuclear Regulatory Commission  
Office of Nuclear Reactor Regulation  
Division of Operating Reactor Licensing  
Plant Licensing Branch 1  
301-415-0489

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**Options**

**Priority:** Normal

**Return Notification:** No

**Reply Requested:** No

**Sensitivity:** Normal

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**REQUEST FOR ADDITIONAL INFORMATION  
LIMERICK GENERATING STATION, UNITS 1&2  
DOCKET NOS. 50-352 AND 50-353  
EPID NO. L-2022-LLA-0174  
LICENSE AMENDMENT REQUEST FOR APPLICATION TO ADOPT TSTF-477, REVISION 3  
AND ASSOCIATED TECHNICAL SPECIFICATION CHANGES**

By letter dated November 17, 2022 (Agencywide Documents Access and Management System Accession No. ML22321A105), Constellation Energy Generation, LLC (the licensee) submitted a license amendment request (LAR) for the Limerick Generating Station, Units 1 and 2 to revise the technical specifications (TS) to adopt TSTF-477, Revision 3, "Add Action for Two Inoperable Control Room AC [Air Conditioning] Subsystems" (ML062510321), and make associated TS changes. The U.S. Nuclear Regulatory Commission (NRC) staff has reviewed the information provided by the licensee and has determined that the staff needs the following additional information to complete its review of the LAR. As discussed with licensee staff via email on July 21, 2023, NRC is requesting the licensee to respond to the RAI on or by August 18, 2023.

**Regulatory Basis**

The regulation under Title 10 of the *Code of Federal Regulations* (10 CFR), Section 50.36(c)(2) requires that technical specifications (TS) contain limiting conditions for operability (LCOs), which are the lowest functional capability or performance levels of equipment required for safe operation of the facility. When an LCO of a nuclear reactor is not met, the licensee shall shut down the reactor or follow any remedial action permitted by the TS until the LCO can be met. Typically, the TS require restoration of equipment in a timeframe commensurate with its safety significance, along with other engineering considerations. The regulation under 10 CFR 50.36(b) requires that TS be derived from the analyses and evaluation included in the safety analysis report, and amendments thereto.

**Requests for additional information (RAIs):**

**RAI 1** – The proposed applicability statement for the new TS 3.7.2.2 does not include "operations with a potential for draining the reactor vessel" (OPDRVS). TS 3.7.2.2 Action b.1 includes a statement to "initiate action to suspend operations with a potential for draining the reactor vessel." Without OPDRVS included in the applicability, Action b.1 would not be required because the LCO would not be required to be entered during this operational condition. OPDRVS are included in the applicability statement of TSTF-477-A; however, they were eliminated via Amendment Nos. 252 and 214 (ML21032A270) for Limerick's adoption of TSTF-542, Revision 2, "Reactor Pressure Vessel Water Inventory Control" (ML16074A448). The NRC staff requests the licensee to provide additional information on why OPDRVS were included in the proposed TS 3.7.2.2 Action statements when they were removed via the amendments for TSTF-542.

**RAI 2** – The proposed TS 3.7.2.2 Action b.1 included the following action: "or place the OPERABLE control room AC subsystem in operation." Action b.2 contains the statement, "initiate action to suspend operations with a potential for draining the reactor vessel." TSTF-477-A and NUREG-1433, Revision 5, "Standard Technical Specifications – General Electric BWR/4 Plants" (ML21272A357), have similar statements; however, the completion time is "immediately." The NRC staff requests the licensee to provide additional information on why the word "immediately" was excluded from the proposed action statements.

**RAI 3** – The NRC staff requests the licensee to provide a copy of the proposed marked up TS bases for the affected sections to inform the NRC staff review.