



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**

REGION I
475 ALLENDALE RD, STE 102
KING OF PRUSSIA, PENNSYLVANIA 19406-1415

September 26, 2023

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

SUBJECT: LIMERICK GENERATING STATION, UNITS 1 AND 2 – REQUEST FOR INFORMATION AND NOTIFICATION OF CONDUCT OF IP 71111.21.N.04, “AGE-RELATED DEGRADATION,” REFERENCE INSPECTION REPORT 05000352/2023010 AND 05000353/2023010

Dear David Rhoades:

The purpose of this letter is to notify you that the U.S. Nuclear Regulatory Commission (NRC) staff will conduct IP 71111.21N.04, “Age-Related Degradation” baseline inspection at the Limerick Generating Station in November 2023. Jeff Kulp, a Senior Reactor Inspector from the NRC’s Region I Office, will lead the inspection team. The team will be composed of personnel from the NRC Region I Office. The inspection will be conducted in accordance with IP 71111.21N.04 (ADAMS Accession No. ML22210A107). The inspection will evaluate the implementation of the programs and activities to determine on a sampling basis that age-related degradation of structures and components (SCs) is identified and addressed.

The schedule for the inspection is as follows:

- Information gathering visit: Week of October 10, 2023
- Onsite inspection: Weeks of November 13 through November 27, 2023

The purpose of the information gathering visit is to become familiar with the station maintenance, surveillance, testing, inspection, and condition monitoring programs, become familiar with plant layout, support identification of SCs that will be reviewed during the inspection, and, as necessary, obtain plant specific site access training and badging for unescorted site access. An initial list of documents that the team will review during the information gathering visit are listed in the attached Enclosure.

During the information gathering visit, the team leader will also discuss the following inspection support administrative details: office space size and location; specific documents requested to be made available to the team in their office spaces; arrangements for reactor site access and the availability of knowledgeable plant staff and licensing organization personnel to serve as points of contact during the inspection.

For SCs that the inspection will review, an initial list of the documents the team will review during the conduct of the inspection are also listed in the Enclosure. The team leader will contact you with identified SCs by October 27, 2023. Also, personnel should be available at the site during the inspection who are knowledgeable regarding maintenance, surveillance, testing, inspection, and condition monitoring programs.

This letter does not contain new or amended information collection requirements subject to the *Paperwork Reduction Act of 1995* (44 U.S.C. 3501 et seq.). Existing information collection requirements were approved by the Office of Management and Budget, under Control Number 3150-0011. The NRC may not conduct or sponsor, and a person is not required to respond to, a request for information or an information collection requirement unless the requesting document displays a currently valid Office of Management and Budget control number.

In accordance with 10 *Code of Federal Regulations* (10 CFR) 2.390 of the NRC rules and practices, a copy of this letter and its enclosures will be available electronically for public inspection in the NRC public document room or from the publicly available records component of NRC's document system (ADAMS). ADAMS is accessible from the NRC website (<http://www.nrc.gov/reading-rm/adams.html>).

This baseline inspection and the supporting inspection procedure and documentation template are new to the Reactor Oversight Process this year. As such, please communicate with the team lead readily if there are questions as to document scope or suggestions to better accomplish this process.

Sincerely,

Mel Gray, Chief
Engineering Branch 1
Division of Operating Reactor Safety

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

Enclosure:
Documents Requested for Information
Gathering Visit

cc w/ encl: Distribution via LISTSERV

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DOCUMENT NAME: <https://usnrc.sharepoint.com/teams/Region-I-EB1/Documents/Inspections/Current/Limerick ARD/Limerick 2023 ARD RFI letter.docx>
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Enclosure: Documents Requested for Information Gathering Visit

The following information is requested by October 10, 2023, which is the first day of the information gathering trip. Electronic format is the preferred media. If electronic media is made available via an internet based remote document management system, then the remote document access should allow inspectors to download, save, and print the documents in the NRC's regional office. Electronic media on compact disc or paper records (hard copy) are acceptable. At the end of the inspection, the documents in the team's possession will not be retained.

This document request is based on typical documents that a generic plant might have. As such, this document request is not meant to imply that any specific plant is required to have all of the listed documents. In addition, your plant specific document titles may vary from the document titles listed below.

Contact Information:

Team Leader: Jeff Kulp

Email: jak2@nrc.gov

Telephone: (610) 337-5348 (Cell: preferred and provided separately)

Documents Requested:

- 1) A list of 50.65 (a)(1) structures, systems and components from the past 5 years.
- 2) A list of maintenance rule functional failures from the past 5 years.
- 3) A list of most recent system health status for High Safety Significance (HSS) and degraded Low Safety Significance (LSS) systems.
- 4) The most recent evaluation of maintenance effectiveness required per 10 CFR 50.65(a)(3).
- 5) The maintenance rule scoping document and performance criteria.
- 6) List of corrective action documents associated with component failures, or keyword search of "aging," "age-related," "wear," "accelerated wear," "corrosion," "abnormal wear," "accelerated degradation," and "abnormal degradation" from the past 5 years. If the site uses other terms to identify age-related degradation mechanisms, please provide a list related to those terms. Please include a short description of the issue in the system generated listing.
- 7) A list of Part 21 Reports applicable to the site from the past 5 years.
- 8) A list of top 100 most risk-significant SCs. If possible, designate the component as active or passive in the risk ranking.
- 9) The site-specific probabilistic risk assessment (PRA) identifying risk-significant functions and latest PRA Summary Document.

Enclosure

Enclosure: Documents Requested for Information Gathering Visit

- 10) Scoping document and basis for 10 CFR 50.49, Environmental Qualification.
- 11) Aging management programs and basis documents.
- 12) Electronic copy of the UFSAR, Technical Specification and Technical Requirements Manual.
- 13) List of systems (system numbers / designators and corresponding noun names).
- 14) List of preventive maintenance deferrals and change requests for the last 5 years.
- 15) A list of RISC-1, RISC-2, and RISC-3 SSCs.
- 16) A listing of commercial grade dedication packages for the last 5 years.