

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

May 1, 2012

LICENSEE: **Exelon Generation Company, LLC**

- FACILITY: Limerick Generating Station
- SUBJECT: SUMMARY OF TELEPHONE CONFERENCE CALL HELD ON FEBRUARY 14. 2012, BETWEEN THE U.S. NUCLEAR REGULATORY COMMISSION AND EXELON GENERATION COMPANY, LLC, CONCERNING REQUESTS FOR ADDITIONAL INFORMATION PERTAINING TO THE LIMERICK GENERATING STATION, LICENSE RENEWAL APPLICATION (TAC. NOS. ME6555 AND ME6556)

The U.S. Nuclear Regulatory Commission (NRC or the staff) and representatives of Exelon Generation Company, LLC held a telephone conference call on February 14, 2012, to discuss and clarify the staff's requests for additional information (RAIs) concerning the Limerick Generating Station, license renewal application. The telephone conference call was useful in clarifying the intent of the staff's RAIs.

Enclosure 1 provides a listing of the participants and Enclosure 2 contains a listing of the RAIs discussed with the applicant, including a brief description on the status of the items.

The applicant had an opportunity to comment on this summary.

Robert F. Kuntz, Schior Project Manager Projects Branch 1 Division of License Renewal Office of Nuclear Reactor Regulation

Docket Nos. 50-352 and 50-353

Enclosures:

- 1. List of Participants
- 2. List of Requests for Additional Information

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TELEPHONE CONFERENCE CALL LIMERICK GENERATING STATION LICENSE RENEWAL APPLICATION

LIST OF PARTICIPANTS February 14, 2011

PARTICIPANTS	AFFILIATIONS
Robert Kuntz	Nuclear Regulatory Commission (NRC)
Kim Green	NRC
James Gavula	NRC
Seung Min	NRC
Duc Nguyen	NRC
Christopher Wilson	Exelon Generation Company, LLC (Exelon)
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•	
Gene Kelly	Exelon
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DRAI 3.1.1.60-1

Background:

SRP-LR Table 3.1.1, item 3.1.1-60 addresses carbon steel piping components exposed to reactor coolant that are being managed for wall thinning due to flow-accelerated corrosion. License renewal application (LRA) Table 3.1.1 states that this item is not applicable because there are no carbon steel piping components exposed to reactor coolant that are susceptible to this aging effect in the reactor coolant system. The staff noted that EPRI 1013013, "An Evaluation of Flow-Accelerated Corrosion in the Bottom Head Drain Lines of Boiling Water Reactors," concluded that both Limerick Generating Station (LGS) units were viewed as having very limited susceptibility to damage from this concern.

lssue:

Although LGS is viewed as having limited susceptibility to damage from this concern, it is unclear to the staff that it can be stated that there are no components susceptible to wall thinning due to flow-accelerated corrosion in the reactor coolant system, as claimed in the LRA.

Request:

Provide the bases for the determination that there are no steel piping components exposed to reactor coolant that are susceptible to flow-accelerated corrosion in the reactor coolant system. Include in the response a description of the susceptibility analysis performed for the bottom head drain line as well as other piping and components in the reactor coolant system.

Discussion: The applicant indicated that the request is clear. This DRAI will be sent as a formal RAI.

DRAI 3.2.2.1.1-1

Background:

GALL Report AMP XI.M18, "Bolting Integrity" includes periodic volumetric or surface and visual inspections of closure bolting for leakage, loss of material, cracking, and loss of preload/loss of prestress in accordance with the requirements of the American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel Code (Code) Section XI Inservice Inspection, Subsections IWB, IWC, and IWD. In addition, GALL Report AMP XI.M18 recommends system walkdowns at least once per refueling cycle to ensure detection of leakage at bolted joints before the leakage becomes excessive.

LRA Section B.2.1.11 states that inspection activities for bolting in a submerged environment are performed in conjunction with associated component maintenance activities. The following tables in the LRA contain bolting exposed to an external environment of treated water or raw water (i.e., submerged) and managed for loss of material and loss of preload with the Bolting Integrity program:

- Table 3.2.2-02: Core Spray System
- Table 3.2.2-03: High Pressure Coolant Injection System
- Table 3.2.2-04: Reactor Core Isolation Cooling System

- Table 3.2.2-05: Residual Heat Removal System
- Table 3.3.2-11: Fuel Pool Cooling and Cleanup System
- Table 3.4.2-01: Circulating Water System
- Table 3.4.2-03: Condenser and Air Removal System

Issue:

It is unclear to the staff how inspection of submerged bolting during maintenance activities will be capable of detecting loss of material and loss of preload prior to loss of component intended functions and how often these inspections will be conducted given potentially limited opportunities to drain systems and expose the bolting for inspection.

Request:

- 1. For each system, state the parameters that will be inspected for during opportunistic inspections of normally submerged bolting and the basis for why these parameters will be capable of assessing the condition of the bolting before loss of intended function occurs.
- 2. For each system, state the minimum number and frequency of inspections that will be conducted during the period of extended operation.

Discussion: The applicant indicated that the request is clear. This DRAI will be sent as a formal RAI.

DRAI 3.2.2.1.1-2

Background

LRA Tables 3.2.2-03 and 3.2.2-04 include aging management review items for gray cast iron turbine lube oil reservoirs exposed internally to lube oil; however, selective leaching is not considered to be an aging effect. The LRA proposes to manage aging of these components with the Lubricating Oil Analysis and One-Time Inspection programs.

According to the LRA, the Lubricating Oil Analysis program directs the condition monitoring activities (sampling, analyses, and trending) to manage loss of material and reduction of heat transfer in piping, piping components, piping elements, heat exchangers, and tanks. The One-Time Inspection program provides inspections focusing on locations that are isolated from the flow stream, that are stagnant, or have low flow for extended periods and are susceptible to the gradual accumulation or concentration of agents that promote certain aging effects. According to the LRA, the inspections will include a representative sample of the system population and will focus on the bounding or lead components most susceptible to aging, due to time in service, and severity of operating conditions.

Selective leaching is known to occur in susceptible materials such as gray cast iron and uninhibited brasses with greater than 15-percent zinc when an electrolyte is present.

Issue

Sufficient information is not available to determine whether susceptible locations (e.g., turbine lube oil reservoirs) will be included in the sample for inspection or not. Moreover, visual inspections alone may not be sufficient to detect selective leaching. Therefore, the staff cannot conclude whether aging of the gray cast iron reservoirs internally exposed to lube oil will be adequately managed or not.

<u>Request</u>

Explain if samples will include susceptible locations to confirm that selective leaching is not occurring in areas where water can accumulate. If it is determined that selective leaching is a relevant aging effect/mechanism to be managed, explain what aging management program and inspection method(s) (e.g., hardness measurement) will be used to manage the loss of material due to selective leaching.

Discussion: The applicant indicated that the request is clear. This DRAI will be sent as a formal RAI.

DRAI 3.2.2.1.1-3

Background

In the LRA AMR tables, there are several entries for copper alloy with 15-percent zinc or more or gray cast iron components internally exposed to "air/gas – wetted." The LRA states that these components will be managed for loss of material by the Inspection of Internal Surfaces of Miscellaneous Piping and Ducting program. This program uses periodic and opportunistic inspections of the internal surfaces of components augmented by physical manipulation of flexible elastomers where appropriate.

The LRA defines "air/gas – wetted" as "air/gas environments containing significant amounts of moisture where condensation or water pooling may occur. This environment includes air with enough moisture to facilitate loss of material in steel caused by general, pitting, and crevice corrosion."

Selective leaching is known to occur in susceptible materials such as gray cast iron and uninhibited brasses with greater than 15-percent zinc when moisture or water (an electrolyte) is present.

<u>lssue</u>

Visual inspections alone may not be sufficient to detect selective leaching. Therefore, the staff cannot conclude whether aging of the copper alloy with 15-percent zinc or more or gray cast iron components internally exposed to "air/gas – wetted" will be adequately managed or not.

Request

Explain why copper alloy with 15-percent zinc or more or gray cast iron components internally exposed to air/gas – wetted are not being managed for selective leaching. If it is determined that selective leaching is an appropriate aging effect/mechanism to be managed, explain what

aging management program and inspection method(s) (e.g., hardness measurement) will be used to manage the loss of material due to selective leaching.

Discussion: The applicant indicated that the request is clear. This DRAI will be sent as a formal RAI.

DRAI 3.3.1.30-1

Background

SRP-LR Table 3.3.1, items 3.3.1-30, 3.3.1-31, and 3.3.1-32 addresses piping components made with concrete, reinforced concrete, asbestos cement, and cementitious material exposed to raw water. The GALL Report recommends GALL Report AMP XI.M20, "Open-Cycle Cooling Water System," to manage changes in material properties and cracking due to aggressive chemical attack, and cracking due to settling for these component groups. LRA Table 3.3.1 for the corresponding items state that these items are not applicable because there are no cement, reinforced cement or cementitious material piping exposed to raw water with the above aging effects in auxiliary systems. The staff noted that LRA Table 3.3.2-9, "Fire Protection System" cites item 3.3.1-33, which addresses loss of material due to abrasion, cavitation, aggressive chemical attack and leaching in cement piping components exposed to raw water.

Issue

As indicated in LRA Table 3.3.1, item 3.3.1.33, Limerick has cement piping exposed to raw water in the fire protection system. As such, it is unclear to the staff why the aging effects described in LRA Table 3.3.1, items 3.3.1-30 and 31 (i.e., changes in material properties and cracking) would not apply to cement fire protection piping. Additionally, there is insufficient information in the LRA for the staff to conclude that LRA Table item 3.3.1-32 is not applicable to LGS. Specifically, the discussion provided in the LRA table for this item is unclear as to whether the conclusion of applicability was based on the fact that there is no piping at LGS constructed of reinforced concrete or asbestos cement or was based on the fact that such piping is not subject to the aging effects of changes in material properties and cracking.

Request:

- 1. Provide the basis for concluding that LRA Table 3.3.1, items 3.3.1.30 and 31 (and the associated aging effects) do not apply to concrete fire protection piping at LGS.
- 2. Clarify whether the conclusion of applicability for LRA Table 3.3.1, item 3.3.1.32, was based on the fact that there is no piping at Limerick constructed of reinforced concrete or asbestos cement or was based on the fact that such piping is not subject to the aging effects of changes in material properties and cracking.

Discussion: The applicant indicated that the request is clear. This DRAI will be sent as a formal RAI.

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DRAI 3.6.2.3-1

Background

In LRA Table 3.6.2-1, corresponding to Table 1 Items 3.6.1.16 and 17, the applicant indicated, via note A, that the combination of component type, material, environment, and aging effect requiring management of fuse holders not part of active equipment is consistent with the GALL Report. The applicant provided information about how it will manage the aging effects by proposing the Fuse Holders program, LRA AMP B.2.1.42. The LRA states that this program is consistent with GALL Report AMP XI.E5. During the onsite audit, the staff noted that certain fuse holders (metallic clamps) were in scope of license renewal (i.e., fuse holders program. GALL Report, items VI.A.LP-23 and -31, "Fuse Holders (Not Part of active equipment): Metallic Clamp," identifies the aging/effect mechanism as increased resistance of connection due to chemical contamination, corrosion, oxidation; fatigue due to ohmic heating, thermal cycling, electrical transients, increased resistance of connection due to fatigue caused by frequent manipulation or vibration. The associated GALL Report AMP XI.E5, "Fuse Holders," states that fuse holders within the scope of license renewal should be tested to provide an indication of the condition of the metallic clamps of fuse holders.

<u>Issue</u>

The LRA did not provide technical justifications of why these fuse holders which are in the scope of license renewal are excluded from the applicant's Fuse Holders program.

Request

Provide a list of fuse holders that are within the scope of license renewal and subject to an aging management review (i.e., fuse holders located outside of active equipment). For fuse holders within the scope of license renewal, provide an evaluation that addresses each aging effect/mechanism identified in GALL Report, items VI.A.LP-23 and -31 and identify fuse holders within the scope of license renewal which will be included in the Fuse Holders program (LRA AMP B.2.1.42) and the AMP basis document.

Discussion: The applicant indicated that the request is clear. This DRAI will be sent as a formal RAI.

DRAI B.1.4-1

Background

License Renewal Application (LRA) Section B.1.4 states that, during the first 10 years of entering the period of extended operation, the owners of programs credited for license renewal will perform a review of plant-specific and industry operating experience to confirm the effectiveness of the Aging Management Program (AMPs). This review will determine if the AMP is currently effective, requires modification, or identify a need to develop a new AMP. In addition, the LRA states that follow-up actions will be taken as appropriate to provide additional assurance that aging of systems, structures, and components in the scope of license renewal will be adequately managed throughout the period of extended operation.

<u>Issue</u>

LRA Section B.1.4 describes a plan to review operating experience once for each AMP after entering the period of extended operation. New operating experience information is generated daily; therefore, the proposed one-time review would not result in the timely consideration of operating experience. Further, if the operating experience review occurs only once in the first 10 years of entering the period of extended operation, then there will be a gap between that review and the renewed license expiration date, during which no operating experience will be considered to determine whether the AMPs are effective, require modification, or whether there is a need to develop new AMPs.

Request

Describe programmatic activities that will be used for the ongoing review of plant-specific and industry operating experience to ensure that (a) the license renewal AMPs are and will continue to be effective in managing the aging effects for which they are credited, and (b) the AMPs will be enhanced or new AMPs will be developed when the review of operating experience indicates that the AMPs may not be fully effective.

In this description, address the following:

- (a) If crediting existing activities, justify why they would not preclude the consideration of operating experience related to aging.
- (b) Describe the sources of plant-specific and industry operating experience that will be reviewed for potential impacts on the aging management activities.
- (c) Indicate whether plant-specific and industry operating experience only will be considered from a prescribed list of sources.
- (d) Describe how plant-specific and industry operating experience evaluations will be prioritized and completed in a timely manner.
- (e) Describe the operating experience evaluation records with respect to what will be considered and recorded on aging. Indicate whether the evaluation records will be maintained in auditable and retrievable form.
- (f) When it is determined through an operating experience evaluation that enhancements to the aging management activities are necessary, including the development of new AMPs, describe how the enhancements will be implemented.
- (g) Describe how the ongoing operating experience review activities will be administratively controlled. Indicate whether these administrative controls include periodic audits to ensure the effectiveness of the operating experience review activities.
- (h) Describe how operating experience issues will be identified and categorized as related to aging. If an identification code is used, provide its definition or the criteria for its application. Also, describe how age-related operating experience will be trended.

- (i) Indicate whether guidance documents and other publications are considered as a source of operating experience information. If they are considered as a potential source, provide a plan for considering the content of guidance documents, such as the GALL Report, as operating experience applicable to aging management. If they are not a potential source, justify why they should not be considered as such.
- (j) Describe how evaluations of operating experience issues related to aging will consider the following:
 - systems, structures, or components
 - materials
 - environments
 - aging effects
 - aging mechanisms
 - AMPs
- (k) Describe criteria for considering when AMPs should be modified or new AMPs developed due to operating experience.
- Describe how the results of the AMP inspections, tests, analyses, etc. will be considered as operating experience, both when they meet and do not meet the applicable acceptance criteria.
- (m) Describe the training requirements and justify the level of training on aging issues for those plant personnel responsible for screening, assigning, evaluating, and submitting plant-specific and industry operating experience. Also, provide the periodicity of the training and describe how it will account for personnel turnover.
- (n) Provide criteria for reporting plant-specific operating experience on age-related degradation to the industry.

Discussion: The applicant indicated that the request is clear. This DRAI will be sent as a formal RAI.

DRAI A.1-1

Background

Section 54.21(d) of 10 CFR requires the application to contain a final safety analysis report supplement. This supplement must contain a summary description of the programs and activities for managing the effects of aging and the evaluation of time-limited aging analyses for the period of extended operation.

LRA Appendix A contains the applicant's Updated Final Safety Analysis Report (UFSAR) supplement. This supplement contains Commitment No. 46, which is to, "Perform a review of plant-specific and industry operating experience to confirm the effectiveness of the aging management programs." The implementation schedule for this commitment is "[d]uring the first 10 years of entering the period of extended operation."

<u>Issue</u>

As discussed above in RAI B.1.4-1, the implementation schedule would not provide for the timely consideration of operating experience. Further, this commitment does not adequately describe how operating experience will be considered to determine whether the AMPs are effective, require modification, or whether there is a need to develop new AMPs.

<u>Request</u>

Consistent with the response to RAI B.1.4-1 above, provide a summary description of the ongoing operating experience review activities for the Final Safety Analysis Report (FSAR) supplement required in accordance with 10 CFR 54.21(d). If enhancements are necessary, identify them in the FSAR supplement and include the schedules for their implementation.

Discussion: The applicant indicated that the request is clear. This DRAI will be sent as a formal RAI.

DRAI 3.4.1.11-1

Background

LRA item 3.4.1-11 addresses cracking due to stress corrosion cracking (SCC) of stainless steel piping, piping components, and piping elements, tanks, heat exchanger components exposed to steam or treated water greater than 60°C (140°F). LRA item 3.4.1-11 indicates that cracking due to SCC of the components is managed by the Water Chemistry and One-Time Inspection programs.

LRA Table 3.1.2-1 addresses the aging management review results for the reactor coolant pressure boundary. More specifically, LRA Table 3.1.2-1 addresses the stainless steel piping, piping components, and piping elements exposed to steam (internal), indicating that these components are related to LRA item 3.4.1-11 and cracking due to SCC of these stainless steel components are managed by the Water Chemistry and One-Time Inspection programs.

In comparison, GALL Report item IV.C1.R-20 and SRP-LR Table 3.1-1, ID 97 recommend GALL Report AMP XI.M7, "BWR Stress Corrosion Cracking," and GALL Report AMP XI.M2, "Water Chemistry," to manage cracking due to SCC and intergranular stress corrosion cracking (IGSCC) of stainless steel piping, piping components, and piping elements greater than or equal to four nominal pipe size (NPS) exposed to reactor coolant. GALL Report, Section IX.D, "Selected Definitions & Use of Terms for Describing and Standardizing Environments," states that reactor coolant is treated water in the reactor coolant system and connected systems at or near full operating temperature, including steam associated with BWRs.

Issue

The LRA credits the One-Time Inspection program to manage cracking due to SCC of the reactor coolant pressure boundary stainless steel piping, piping components, and piping elements exposed to steam (internal), which are addressed in LRA Table 3.1.2-1. The staff needs clarification as to whether any of these stainless steel components is included in the scope of the BWR SCC program or the ASME Section XI Inservice Inspection, Subsections

IWB, IWC, and IWD program, which includes periodic inspections. The staff also needs clarification as to the adequacy of the One-Time Inspection program.

Request

- 1. Provide information to clarify why any of these stainless steel components exposed to steam are not included in the scope of the BWR SCC program or the ASME Section XI Inservice Inspection, Subsections IWB, IWC, and IWD program, which includes periodic inspections (for example, describe the nominal pipe sizes, more specific component types, locations, and applicable inspection requirements of ASME Code, Section XI).
- Justify why the One-Time Inspection program, which does not include periodic inspections, is adequate to manage cracking due to SCC of these stainless steel components. As part of the response, clarify whether SCC has been observed in these components to demonstrate that the LGS operating experience supports the adequacy of the One-Time Inspection program to manage the aging effect.
- 3. Revise the LRA, consistent with the response to items 1 and 2 above.

Discussion: The applicant indicated that the request is clear. This DRAI will be sent as a formal RAI.

DRAI 3.4.1.11-2

Background

LRA item 3.4.1-11 addresses cracking due to SCC of stainless steel piping, piping components, and piping elements, tanks, heat exchanger components exposed to steam or treated water greater than 60°C (140°F). LRA item 3.4.1-11 indicates that cracking due to SCC of the components is managed by the Water Chemistry and One-Time Inspection programs. LRA Table 3.1.2-1 addresses the aging management review results for the reactor coolant pressure boundary. LRA Table 3.1.2-1 also indicates that the flow device (main steam flow elements), made of cast austenitic stainless steel (CASS) and exposed to steam (internal), is related to LRA item 3.4.1-11. LRA Table 3.1.2-1 further indicates that cracking due to SCC of these CASS components are managed by the Water Chemistry and One-Time Inspection programs.

In comparison, GALL Report item IV.C1.R-20 and SRP-LR Table 3.1-1, ID 97 recommend GALL Report AMP XI.M7, "BWR Stress Corrosion Cracking," and GALL Report AMP XI.M2, "Water Chemistry," to manage the aging effect of stainless steel piping, piping components, and piping elements greater than or equal to four NPS exposed to reactor coolant. GALL Report, Section IX.D, "Selected Definitions & Use of Terms for Describing and Standardizing Environments," states that reactor coolant is treated water in the reactor coolant system and connected systems at or near full operating temperature, including steam associated with BWRs.

In addition, GALL Report, IV.C1.R-52 addresses loss of fracture toughness due to thermal aging embrittlement of Class 1 piping, piping components, and piping elements exposed to reactor coolant greater than 250°C (482°F), for which GALL Report AMP XI.M12, "Thermal Aging

Embrittlement of Cast Austenitic Stainless Steel (CASS)." GALL Report AMP XI.M12 includes the screening criteria for susceptibility of CASS materials to thermal aging embrittlement.

<u>Issue</u>

The applicant credits the One-Time Inspection program to manage cracking due to SCC of the CASS flow device exposed to steam. The staff needs clarification as to whether any of these CASS components is included in the scope of the BWR SCC program. The staff also needs clarification as to whether any of these CASS components is included in the scope of the ASME Section XI Inservice Inspection, Subsections IWB, IWC, and IWD program, which includes periodic inspections.

In addition, the staff needs clarification as to whether these CASS components are susceptible to loss of fracture toughness due to thermal aging embrittlement based on the material screening criteria that are consistent with the guidance in GALL Report AMP XI.M12.

<u>Request</u>

- Provide information to clarify why any of these CASS flow device components exposed to steam is not included in the scope of the BWR SCC program or the ASME Section XI Inservice Inspection, Subsections IWB, IWC, and IWD program, which includes periodic inspections (for example, describe more specific component type, locations/configurations, and applicable inspection requirements of ASME Code Section XI).
- Justify why the One-Time Inspection program, which does not include periodic inspections, is adequate to manage cracking due to SCC of the CASS components. As part of the response, clarify whether or not SCC has been observed in these components to demonstrate that the LGS operating experience supports the adequacy of the One-Time Inspection program to manage the aging effect.
- 3. Clarify why these components are not susceptible to loss of fracture toughness due to thermal aging embrittlement.

As part of the response, describe the casting method, molybdenum content and ferrite content of the components to clarify whether the applicant's evaluation of the material susceptibility to thermal aging embrittlement is consistent with the material screening criteria addressed in GALL Report AMP XI.M12.

If these components are determined to be susceptible to loss of fracture toughness due to thermal aging embrittlement, propose an AMP to manage the aging effect.

4. Revise the LRA, consistent with the response to items 1 through 3 of the above.

Discussion: The applicant indicated that plant specific note 4 addressed the information requested. The staff reviewed the information in plant specific note 4 in the LRA and agreed that the information sought was contained therein. Therefore, this DRAI will not be sent as a formal RAI.

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DRAI 3.5.2.11-1

Background:

LRA Table 3.5.1, item 3.5.1-78 states that the spent fuel pool liner is managed for loss of material and cracking by the Water Chemistry program and monitoring of the leak chase charinel drainage system.

LRA Tables 3.5.2-11 and 3.5.2-13 include several stainless steel components that reference item 3.5.1-78, but do not line the spent fuel pool. These include, but are not necessarily limited to, the debris screens in the primary containment system in LRA Table 3.5.2-11 and the integral attachments in the reactor enclosure system in LRA Table 3.5.2-13.

For stainless steel components other than the spent fuel pool liner that are exposed to treated water, the GALL Report typically recommends the One-Time Inspection program to verify the effectiveness of the Water Chemistry program (e.g., GALL Report item VII.A4.AP-110).

Issue:

Monitoring of the leak chase channel drainage may not be an appropriate activity to verify the effectiveness of the Water Chemistry program for all of the components in LRA Tables 3.5.2-11 and 3.5.2-13 that reference item 3.5.1-78.

Request:

Identify those items in LRA Tables 3.5.2-11 and 3.5.2-13 that reference LRA item 3.5.1-78 for which monitoring of the leak chase channel drainage system would not be expected to detect degradation. For those items, propose an alternative activity to verify the effectiveness of the Water Chemistry program.

Discussion: The applicant indicated that the request is clear. This DRAI will be sent as a formal RAI.

SUBJECT: Summary of Telephone Conference Call conducted on February 14, 2012

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- LICENSEE: Exelon Generation Company, LLC
- FACILITY: Limerick Generating Station
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Enclosure 1 provides a listing of the participants and Enclosure 2 contains a listing of the RAIs discussed with the applicant, including a brief description on the status of the items.

The applicant had an opportunity to comment on this summary.

/RA/ Robert F. Kuntz, Senior Project Manager Projects Branch 1 Division of License Renewal Office of Nuclear Reactor Regulation

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