



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**

REGION I
2100 RENAISSANCE BLVD., SUITE 100
KING OF PRUSSIA, PA 19406-2713

September 2, 2014

Mr. Michael J. Pacilio
Senior Vice President, Exelon Generation Company, LLC
President and Chief Nuclear Officer, Exelon Nuclear
4300 Winfield Rd.
Warrenville, IL 60555

**SUBJECT: MID-CYCLE ASSESSMENT LETTER FOR LIMERICK GENERATING STATION,
UNITS 1 AND 2 (REPORT 05000352/2014006 AND 05000353/2014006)**

Dear Mr. Pacilio:

On August 13, 2014, the U.S. Nuclear Regulatory Commission (NRC) completed its mid-cycle performance review of Limerick Generating Station Units 1 and 2. The NRC reviewed the most recent quarterly performance indicators in addition to inspection results and enforcement actions from July 1, 2013 through June 30, 2014. This letter informs you of the NRC's assessment of your facility during this period and its plans for future inspections at your facility.

The NRC determined that overall, Limerick Generating Station (LGS) Units 1 and 2 was operated in a manner that preserved public health and safety and met all cornerstone objectives. The NRC also determined the performance at LGS Units 1 and 2 during the most recent quarter was within the Licensee Response Column of the NRC's Reactor Oversight Process Action Matrix because all inspection findings had very low (i.e., green) safety significance, and all performance indicators demonstrated that your performance was within the nominal, expected range (i.e., green). Therefore, the NRC plans to conduct Reactor Oversight Process baseline inspections at your facility.

Although plant performance was within the Licensee Response Column, the NRC has not yet finalized the significance of an apparent violation that has preliminarily been determined to have greater than very low security significance. Additional information on this apparent violation was documented in NRC inspection reports (IR) 05000352/2014403 and 05000353/2014403 (ML14211A077). We note that your staff chose to request a regulatory conference, as described in the above referenced IR, and the meeting will be held in the NRC Region I office on September 18, 2014. This meeting has been announced in Notice 2014-016, (ML14237A362). However, in the interest of protecting sensitive, security-related information, this regulatory conference will not be open for public observation. The final security significance determination may affect the NRC's assessment of plant performance, regulatory actions and oversight, and the enclosed inspection plan.

As a result of the Safety Culture Common Language Initiative, the terminology and coding of cross-cutting aspects were revised. All cross-cutting aspects identified during inspections conducted in calendar year 2014 reflect this revision to Inspection Manual Chapter (IMC) 0310. Cross-cutting aspects identified in 2013 using the 2013 terminology were converted to the latest revision in accordance with the cross-reference in IMC 0310 during the mid-cycle assessment review and evaluated for cross-cutting themes and potential substantive cross-cutting issues in accordance with IMC 0305.

The enclosed inspection plan lists the inspections scheduled through December 31, 2015. Routine inspections performed by resident inspectors are not included in the inspection plan. The inspections listed during the last nine months of the inspection plan are tentative and may be revised at the end-of-cycle performance review. The NRC provides the inspection plan to allow for the resolution of any scheduling conflicts and personnel availability issues. The NRC will contact you as soon as possible to discuss changes to the inspection plan should circumstances warrant any changes. This inspection plan does not include security-related inspections, which will be sent via separate, non-publicly available correspondence.

In response to the accident at Fukushima, the Commission issued Order EA-12-049, "Order Modifying Licenses with Regard to Requirements for Mitigation Strategies for Beyond-Design-Basis External Events," which requires licensees to develop, implement, and maintain guidance and strategies to maintain or restore core cooling, containment, and spent fuel pool cooling capabilities following a beyond-design-basis external event. Additionally, the Commission issued Order EA-12-051, "Order Modifying Licenses with Regard to Reliable Spent Fuel Pool Instrumentation," which requires licensees to have a reliable means of remotely monitoring wide-range Spent Fuel Pool levels to support effective prioritization of event mitigation and recovery actions in the event of a beyond-design-basis external event. The NRC is conducting audits of licensee efforts towards compliance with these Orders. This audit includes an onsite component in order for the NRC to evaluate licensee plans for complying with the Orders, as described in site-specific submittals, and to receive and review information relative to associated open items. This onsite activity will occur in the months prior to a declaration of compliance for the first unit at each site, and will aid staff in development of an ultimate Safety Evaluation for the site. The date for the onsite component at your site has been coordinated with your staff and has been scheduled for the week of October 27, 2014. A site-specific audit plan for the visit will be provided in advance to allow sufficient time for preparations.

In accordance with Title 10 of the *Code of Federal Regulations* (10 CFR) Section 2.390 of the NRC's "Rules of Practice," a copy of this letter will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records component of the NRC's Agencywide Documents Access and Management system (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

Please contact me at (610) 337-5200 with any questions you have regarding this letter.

Sincerely,

/RA/

Fred L. Bower, III, Chief
Division of Reactor Projects
Project Branch 4

Docket Nos.: 50-352, 50-353
License Nos.: NPF-39, NPF-85

Enclosure: Limerick Generating Station Inspection/Activity Plan

cc w/encl: Distribution via ListServ

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Enclosure: Limerick Generating Station Inspection/Activity Plan

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Distribution: See next page

DOC NAME: S:\ROP Assessment Meetings\ROP-15 Mid-Cycle Review\Branch 4\Limerick\LIM 2014 MC Letter Final.docx
ADAMS Accession No.: **ML14239A190**

<input checked="" type="checkbox"/> SUNSI Review		<input checked="" type="checkbox"/> Non-Sensitive <input type="checkbox"/> Sensitive		<input checked="" type="checkbox"/> Publicly Available <input type="checkbox"/> Non-Publicly Available	
OFFICE	RI/DRP	RI/DRP	RI/DRS	RI/DRP	
NAME	EDiPaolo/GSB for	SBarber/ GSB	ADimitriadis/ JRC for	FBower/ FLB	
DATE	08/22 /14	08/22 /14	08/25 /14	09/02/14	

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Limerick
Inspection / Activity Plan
07/01/2014 - 12/31/2015

Unit Number	Planned Dates		Inspection Activity	Title	No. of Staff on Site
	Start	End			
			711111B - LSRO REQ INSP WITH P/F RESULTS		2
1, 2	06/02/2014	12/31/2014	IP 711111B	Licensed Operator Requalification Program	
			INSP - RADIATION PROTECTION		1
1, 2	07/07/2014	07/11/2014	IP 71124.01	Radiological Hazard Assessment and Exposure Controls	
1, 2	07/07/2014	07/11/2014	IP 71124.02	Occupational ALARA Planning and Controls	
1, 2	07/07/2014	07/11/2014	IP 71124.03	In-Plant Airborne Radioactivity Control and Mitigation	
1, 2	07/07/2014	07/11/2014	IP 71124.04	Occupational Dose Assessment	
1, 2	07/07/2014	07/11/2014	IP 71124.05	Radiation Monitoring Instrumentation	
			71152B - PI&R BIENNIAL		4
1, 2	09/15/2014	09/20/2014	IP 71152B	Problem Identification and Resolution	
1, 2	09/29/2014	10/03/2014	IP 71152B	Problem Identification and Resolution	
			10/6EXAM - INITIAL OL EXAM		4
1	12/15/2014	12/19/2014	U01892	FY15-LIMERICK INITIAL OPERATOR LICENSING EXAM	
1	01/12/2015	01/21/2015	U01892	FY15-LIMERICK INITIAL OPERATOR LICENSING EXAM	
			INSP - RADIATION PROTECTION		1
1, 2	09/08/2014	09/12/2014	IP 71124.01	Radiological Hazard Assessment and Exposure Controls	
1, 2	09/08/2014	09/12/2014	IP 71124.02	Occupational ALARA Planning and Controls	
1, 2	09/08/2014	09/12/2014	IP 71124.03	In-Plant Airborne Radioactivity Control and Mitigation	
1, 2	09/08/2014	09/12/2014	IP 71124.04	Occupational Dose Assessment	
1, 2	09/08/2014	09/12/2014	IP 71124.05	Radiation Monitoring Instrumentation	
1, 2	09/08/2014	09/12/2014	IP 71151	Performance Indicator Verification	
			7111107T - TRIENNIAL HEAT SINK		1
1, 2	09/29/2014	10/03/2014	IP 7111107T	Heat Sink Performance	
			MODS - PERMANENT PLANT MODIFICATIONS		6
1, 2	11/03/2014	11/07/2014	IP 7111117T	Evaluations of Changes, Tests, and Experiments and Permanent Plant Modifications	
1, 2	11/17/2014	11/21/2014	IP 7111117T	Evaluations of Changes, Tests, and Experiments and Permanent Plant Modifications	
			EP PROG - EP PROGRAM INSPECTION		2
1, 2	12/01/2014	12/05/2014	IP 7111402	Alert and Notification System Testing	
1, 2	12/01/2014	12/05/2014	IP 7111403	Emergency Preparedness Organization Staffing and Augmentation System	
1, 2	12/01/2014	12/05/2014	IP 7111405	Correction of Emergency Preparedness Weaknesses and Deficiencies	
			71124 - RADIATION PROTECTION		1
1, 2	03/16/2015	03/20/2015	IP 71124.01	Radiological Hazard Assessment and Exposure Controls	
1, 2	03/16/2015	03/20/2015	IP 71124.02	Occupational ALARA Planning and Controls	

This report does not include INPO and OUTAGE activities.
This report shows only on-site and announced inspection procedures.

Limerick
Inspection / Activity Plan
07/01/2014 - 12/31/2015

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	Start	End			
71124 - RADIATION PROTECTION					1
1, 2	03/16/2015	03/20/2015	IP 71124.03	In-Plant Airborne Radioactivity Control and Mitigation	
1, 2	03/16/2015	03/20/2015	IP 71124.04	Occupational Dose Assessment	
1, 2	03/16/2015	03/20/2015	IP 71124.05	Radiation Monitoring Instrumentation	
7111108G - U2 INSERVICE INSPECTION					1
2	04/13/2015	04/17/2015	IP 7111108G	Inservice Inspection Activities - BWR	
71124 - RADIATION PROTECTION					1
1, 2	04/13/2015	04/17/2015	IP 71124.01	Radiological Hazard Assessment and Exposure Controls	
1, 2	04/13/2015	04/17/2015	IP 71124.02	Occupational ALARA Planning and Controls	
1, 2	04/13/2015	04/17/2015	IP 71124.03	In-Plant Airborne Radioactivity Control and Mitigation	
1, 2	04/13/2015	04/17/2015	IP 71124.04	Occupational Dose Assessment	
1, 2	04/13/2015	04/17/2015	IP 71124.05	Radiation Monitoring Instrumentation	
ISFSI - ISFSI LOADING INSPECTION					1
1, 2	06/01/2015	08/31/2015	IP 60855	Operation Of An ISFSI	
1, 2	06/01/2015	08/31/2015	IP 60855.1	Operation of an Independent Spent Fuel Storage Installation at Operating Plants	
CDBI - COMPONENT DESIGN BASIS INSPECTION					7
1, 2	06/08/2015	06/12/2015	IP 7111121	Component Design Bases Inspection	
1, 2	06/22/2015	06/26/2015	IP 7111121	Component Design Bases Inspection	
1, 2	07/06/2015	07/10/2015	IP 7111121	Component Design Bases Inspection	
71124 - REMP					1
1, 2	07/13/2015	07/17/2015	IP 71124.07	Radiological Environmental Monitoring Program	
12/7EXAM - INITIAL OL EXAM					4
1	12/07/2015	12/11/2015	U01912	FY16 - LIMERICK INITIAL OPERATOR LICENSING EXAM	
71124 - RADIATION PROTECTION					1
1, 2	09/04/2015	09/08/2015	IP 71124.01	Radiological Hazard Assessment and Exposure Controls	
1, 2	09/04/2015	09/08/2015	IP 71124.02	Occupational ALARA Planning and Controls	
1, 2	09/04/2015	09/08/2015	IP 71124.03	In-Plant Airborne Radioactivity Control and Mitigation	
1, 2	09/04/2015	09/08/2015	IP 71124.04	Occupational Dose Assessment	
1, 2	09/04/2015	09/08/2015	IP 71124.05	Radiation Monitoring Instrumentation	
1, 2	09/04/2015	09/08/2015	IP 71151	Performance Indicator Verification	
7111111B - REQUAL INSP W/ P/F RESULTS					2
1, 2	11/16/2015	11/20/2015	IP 7111111B	Licensed Operator Requalification Program	

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Limerick
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07/01/2014 - 12/31/2015

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EP - EP EXERCISE					
1, 2	11/16/2015	11/20/2015	IP 7111401	Exercise Evaluation	5
1, 2	11/16/2015	11/20/2015	IP 7111408	Exercise Evaluation – Scenario Review	

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 This report shows only on-site and announced inspection procedures.