

SECY-00-045
RIS 2000-17

December 20, 2005

U. S. Nuclear Regulatory Commission
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Washington, DC 20555-0001

Limerick Generating Station, Units 1 and 2
Facility Operating License Nos. NPF-39 and NPF-85
NRC Docket Nos. 50-352 and 50-353

Subject: Annual Commitment Change Summary Report

This report summarizes Limerick changes to NRC commitments that meet the threshold for reporting for the period from July 1, 2004 to June 30, 2005. Changes to these commitments are performed using procedure LS-AA-110, Commitment Management, which employs the guidance provided in NEI 99-04, Guidelines for Managing NRC Commitment Changes. NEI 99-04 was approved by the NRC for licensee use by SECY-00-045, Acceptance of NEI 99-04, 'Guidelines for Managing NRC Commitments'. Licensees were informed that NEI 99-04 was an acceptable process for control of regulatory commitments by the issuance of RIS 2000-17, Managing Regulatory Commitments made by Power Reactor Licensees to the NRC Staff, on September 21, 2000.

If you have any questions or require additional information, please do not hesitate to contact us.

Sincerely,

Original signed by

Ron J. DeGregorio
Vice President – Limerick
Exelon Generation Company, LLC

cc: S. J. Collins, Administrator Region I, USNRC
S. L. Hansell, USNRC Senior Resident Inspector, LGS

LS-AA-110 Commitment Management, Section 4.6, "NRC Notification", requires submittal of a written report once per calendar year. This report shall contain a summary of commitment changes that require NRC notification.

The following commitment changes were implemented between July 1, 2004 and June 30, 2005 and require NRC notification.

Commitment change tracking number:	2005-004
CT number:	T00878
Commitment source document:	PECO response, dated 9/7/90, to NOV (Ref: NRC Inspection Report 50-352/90-17 and 50-353/90-16)
Change:	Deleted

Statement of violation:

Technical Specification 4.0.5.a requires that inservice testing of ASME Code Class 1,2 and 3 pumps shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10 CFR Part 50, Section 50.55a(g), except where specific written relief has been granted by the Commission pursuant to 10 CFR Part 50, Section 50.55a(g)(6)(i). Section XI, Article IWP-3210 states that the allowable ranges of inservice test quantities in relation to the reference values are tabulated in Table IWP-3100-2. If these ranges cannot be met, the Owner shall specify in the record of tests the reduced range limits to allow the pump to fulfill its function, and those limits shall be used in lieu of the ranges given in Table IWP-3100-2.

Contrary to the above, since February 8, 1985, the licensee has been generically using expanded differential pressure ranges for safety related pumps which extend beyond those specified in Table IWP-3100-2 of Section XI of the ASME Boiler and Pressure Vessel Code without appropriate technical justification. In several cases the pump differential pressure ranges were expanded even though the actual pump data had not fallen outside of the Code range. In addition, the ranges were extended so broadly that the inservice Testing Program was not assured of satisfactorily performing its intended function, to assess the operational readiness of safety related pumps.

This is a Severity Level IV violation.

Statement of commitment:

On June 22, 1990, Plant Staff personnel completed a review of the most recent IST pump performance data for all pumps in the IST program. This data review verified that all of the safety-related pumps, including the Residual Heat Removal (RHR) pump noted in the inspection report, met the minimum operability design basis requirements. Additionally, test data indicated no sign of degraded pump performance.

We will no longer use expanded ranges as the acceptance criteria for IST pump performance tests unless there is a pump-specific technical justification.

To ensure continued compliance with ASME Section XI Subsection IWP code requirements, several corrective actions will be implemented. These corrective actions are as follows:

- 1) Use of a recently developed pump performance trending program to identify as-needed changes to the pump reference values. This trending program will also be used to determine the need for the application of expanded ranges.
- 2) For pumps that we determine to require expanded ranges, provide on a case-by-case basis, an expanded range and the appropriate analysis to justify the expanded range.

3) Convert the existing IST program administrative guideline to an administrative procedure. This procedure will strengthen the control and implementation of the IST program. Also, the procedure will provide clearer direction regarding control of pump reference values, the method by which test acceptance criteria ranges are expanded, and a feedback mechanism to confirm applicability of the selected reference values and ranges. This procedure is expected to be implemented by December 31, 1990.

Surveillance test procedures are currently being reviewed to determine if other changes are warranted to ensure that the test results produced are comparable for the purpose of pump performance trending. The Surveillance Test procedure review and necessary testing for trending is expected to be completed by September 30, 1991.

A detailed analysis of past pump performance test data was completed on July 30, 1990. This analysis consisted of compiling IST program test data for each pump and developing a graph by plotting the pump performance data as a function of time. Evaluation of these graphs facilitated the development of the above described corrective actions. Also, these graphs provide a method to graphically trend pump performance. This information will be utilized to re-establish pump reference values and to determine the need for the application of expanded ranges.

The review and analysis of test results completed to date have revealed that the Core Spray system pumps and the Control Enclosure Chilled Water system pumps do not require expanded ranges. The appropriate IST surveillance procedures have been revised to include the IWP code range requirements.

An explanation clarifying the intent of the ASME Section XI Subsection IWP-3210 with respect to the use of expanded ranges, will be added to the IST program document by December 31, 1990.

Change to commitment:

The above commitment is being deleted.

Justification for change:

The commitment restates the existing regulatory requirement, that any deviation from the code requires prior NRC approval, including the justification analysis. The requirement is stated in 10CFR50.55a(f)(5).