

January 23, 2012

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

Limerick Generating Station, Unit 1
Facility Operating License No. NPF-39
NRC Docket No. 50-352

Subject: Update to Generic Letter 2008-01 Commitment

Reference: 1. Letter from K.R. Jury (Exelon Generation Company, LLC/AmerGen Energy Company, LLC) to U.S. NRC "Nine-Month Response to Generic Letter 2008-01," dated October 14, 2008

2. Letter from C.H. Mudrick (Exelon Generation Company, LLC) to U.S. NRC "Update to Generic Letter 2008-01 Commitment," dated April 9, 2010

In the nine-month response to Generic Letter 2008-01 "Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment Spray Systems" (Reference 1), Exelon Generation Company, LLC (Exelon) committed to the U.S. Nuclear Regulatory Commission (NRC) that it would install three new vents on the Limerick Unit 1 High Pressure Coolant Injection (HPCI) system during the 2010 refueling outage (1R13) as documented in Attachment 16 of the Reference 1 letter. These vents were to be installed as a result of a review of system design basis and field walkdowns of areas determined to be susceptible to air entrainment. Installation of the three new vents was completed in accordance with the commitment made in Reference 1. These vents have been installed on the HPCI discharge flow element, suppression pool suction, and injection to the feedwater piping.

As described in Reference 2, based on a review of the internal Technical Evaluation of the HPCI system in response to GL 2008-01, it was determined that the installation of a fourth vent on the HPCI system is needed. This vent involves the HPCI Condensate Storage Tank (CST) suction piping; however, it could not be installed during the 1R13 outage due to valve through-leakage which could not be completely isolated. Following the unsuccessful piping isolation, a freeze seal of the line was attempted but was also unsuccessful. A "hot tap" of the piping was not possible due to proximity to other station components. Therefore, Exelon notified the NRC by letter dated April 9, 2010 that the additional vent on the HPCI system would be installed during the spring 2012 refueling outage (1R14).

Installation of the HPCI CST suction line vent has been rescheduled to align the work with a CST internal inspection, in the spring 2014 refueling outage (1R15), which also requires draining of the CST.

This schedule is acceptable based on the information below.

The pipe at the intended vent location has been periodically ultrasonically tested since the last refueling outage (1R13) which demonstrated that no air is accumulating at this location. With the exception of maintenance activities, the likelihood of introducing air to this location from other mechanisms is low. There are no planned activities to drain this portion of the HPCI suction piping prior to refueling outage (1R15). However, if draining of this piping is required prior to 1R15, the current HPCI system fill and vent procedure includes ultrasonic testing at this location to support operability of the HPCI system. In addition, this location will continue to be periodically monitored in accordance with the current program until installation of the vent is completed in the spring 2014 refueling outage.

One regulatory commitment is contained in the attachment of this letter.

If you have any questions, please contact the Regulatory Assurance Manager at 610-718-3400.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 23rd day of January 2012.

Sincerely,

Original signed by

William F. Maguire
Vice President – Limerick Generating Station
Exelon Generation Company, LLC

Attachment: Summary of Regulatory Commitments

cc: Administrator Region I, USNRC
USNRC Senior Resident Inspector, LGS

Bcc:

W. Maguire, GML5-1

P. Gardner, GML 5-1

D. Doran, SSB 3-1

M. Bonifanti, SSB 3-2

J. Berg, SSB 3-2

W. Tracey, SSB 3-2

C. Brennan, KSA

K. Nicely, Cantera

J. Hunter III, SSB 2-2

S. Gamble, SSB 3-2

D. Helker, KSA

ATTACHMENT
SUMMARY OF REGULATORY COMMITMENTS

The following table identifies commitments made in this document. (Any other actions discussed in the submittal represent intended or planned actions. They are described to the NRC for the NRC's information and are not regulatory commitments.)

| Commitment | Committed Date Or "Outage" | Commitment Type | |
|---|---|-----------------------------|--------------------------|
| | | One-Time Action (Yes/No) | Programmatic (Yes/No) |
| For the HPCI system, one new vent will be installed on LGS Unit 1 prior to completion of the spring 2014 refueling outage (1R15). | Prior to the completion of the spring 2014 refueling outage (1R15) for LGS Unit 1 | Yes | No |