

## LimerickNPEm Resource

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**From:** Kuntz, Robert  
**Sent:** Tuesday, May 01, 2012 2:23 PM  
**To:** Anthony Z. Roisman; gfettus@nrdc.org  
**Cc:** Smith, Maxwell; Kanatas, Catherine  
**Subject:** FW: Limerick Generating Station license Renewal DRAFT RAI  
**Attachments:** DRAFT fire protection scoping RAIs.docx

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**From:** Kuntz, Robert  
**Sent:** Wednesday, January 11, 2012 10:50 AM  
**To:** 'Christopher.Wilson2@exeloncorp.com'  
**Subject:** Limerick Generating Station license Renewal DRAFT RAI

Chris,

Attached is a DRAFT request for information related to the Limerick Generating Station license renewal request. If Exelon would like clarification on the attached let me know and I can set up a teleconference.

Robert Kuntz  
Senior Project Manager  
NRR/DLR/RPB1  
301-415-3733

**Hearing Identifier:** Limerick\_LR\_NonPublic  
**Email Number:** 222

**Mail Envelope Properties** (Robert.Kuntz@nrc.gov20120501142300)

**Subject:** FW: Limerick Generating Station license Renewal DRAFT RAI  
**Sent Date:** 5/1/2012 2:23:05 PM  
**Received Date:** 5/1/2012 2:23:00 PM  
**From:** Kuntz, Robert

**Created By:** Robert.Kuntz@nrc.gov

**Recipients:**

"Smith, Maxwell" <Maxwell.Smith@nrc.gov>  
Tracking Status: None  
"Kanas, Catherine" <Catherine.Kanas@nrc.gov>  
Tracking Status: None  
"Anthony Z. Roisman" <aroisman@nationallegalscholars.com>  
Tracking Status: None  
"gfettus@nrdc.org" <gfettus@nrdc.org>  
Tracking Status: None

**Post Office:**

Files	Size	Date & Time
MESSAGE	503	5/1/2012 2:23:00 PM
DRAFT fire protection scoping RAIs.docx		31974

**Options**

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**Return Notification:** No  
**Reply Requested:** No  
**Sensitivity:** Normal  
**Expiration Date:**  
**Recipients Received:**

LIMERICK GENERATING STATION  
LICENSE RENEWAL APPLICATION  
REQUESTS FOR ADDITIONAL INFORMATION

**DRAI 2.3.3.9-1**

The staff notes that license renewal boundary drawing LR-M-22, Sheet 5, at location F3, shows the cable spreading room's fire walls and associated components including fire doors, fire dampers, and penetration seals as out of scope (i.e., not colored in green). The staff requests that the applicant verify whether the cable spreading rooms fire walls and associated components are in the scope of license renewal in accordance with 10 CFR 54.4(a) and whether they are subject to an aging management review (AMR) in accordance with 10 CFR 54.21(a)(1). The staff requested that, if these fire walls and associated components are excluded from the scope of license renewal and are not subject to an AMR, the applicant provide justification for the exclusion.

**DRAI 2.3.3.9-2**

The following license renewal application (LRA) boundary drawings shows the following fire protection systems/components as out of scope (i.e., not colored in green):

<u>LRA Drawing</u>	<u>Systems/Components</u>	<u>Location</u>
LR-M-22, Sheet 2	Fire water suppression systems associated with Safeguard Transformer (0AX103), Auxiliary Transformer (10X102), and Spare Transformer (10X101)	H3
LR-M-22, Sheet 2	Fire water suppression systems associated with Unit 1 Main Transformers (1AX101), (1BX101), and (1CX101)	H4
LR-M-22, Sheet 4	Fire water suppression systems associated with Safeguard Transformer (0BX103), and Auxiliary Transformer (20X102)	H3
LR-M-22, Sheet 4	Fire water suppression systems associated with Unit 2 Main Transformers (2AX101), (2BX101), and (2CX101)	H3

The staff requests that the applicant verify whether the fire protection systems/components listed above are in the scope of license renewal in accordance with 10 CFR 54.4(a) and whether they are subject to an AMR in accordance with 10 CFR 54.21(a)(1). If they are excluded from the scope of license renewal and are not subject to an AMR, the staff requests that the applicant provide justification for the exclusion.

**DRAI 2.3.3.9-3**

The source of water for the fire protection system at Limerick Generating Station (LGS), Units 1 and 2 is a pair of cooling tower basins, each of which has a capacity of 7,200,000 gallons. Section 9.5.1.6.7, Supplement No. 2, NUREG-0991, "Safety Evaluation Report related to the

operation of Limerick Generating Station, Units 1 and 2,” dated October 1984, states that suction lines to the fire pump are arranged so that if one of the cooling towers becomes unavailable, the suction line can be switched to the functional tower.

The staff requests that the applicant verify whether the fire protection water supply components including suction lines to the fire pump and valves are in the scope of license renewal in accordance with 10 CFR 54.4(a) and subject to an AMR in accordance with 10 CFR 54.21(a)(1). If they are excluded from the scope of license renewal and not subject to an AMR, the staff requests that the applicant provide justification for the exclusion.

#### **DRAI 2.3.3.9-4**

LRA Tables 2.3.3-9 and 3.3.2-9 of the LRA do not include the following fire protection components:

- fire hose stations, fire hose connections, and hose racks
- fire protection water curtain systems in the reactor enclosures and hatchways
- floor drains for fire water
- passive components in fire protection water and foam solution storage tanks heat exchanger
- fire dampers
- fire retardant coating (fireproofing material) for structural steel members
- passive components in diesel driven fire pump engine
- passive components in lightning plant protection system (NFPA 78, Lightning Protection Code)

The staff requests that the applicant verify whether the fire protection components listed above are in the scope of license renewal in accordance with 10 CFR 54.4(a) and whether they are subject to an AMR in accordance with 10 CFR 54.21(a)(1). If they are excluded from the scope of license renewal and are not subject to an AMR, the staff requests that the applicant provide justification for the exclusion.

#### **DRAI 2.3.3.9-5**

Section 2.4, “Scoping and Screening Results: Structures,” of the LRA provides the scoping and screening results of various structures within the scope of license renewal and subject to an AMR. Further, Section 2.4 states that the fire barriers are evaluated separately with the Fire Protection System, LRA Section 2.3.3.9. LRA Table 2.3.3.9, includes fire barriers (doors), fire barriers (fire rated enclosures), fire barriers (for steel components), fire barriers (penetration seals), fire barriers (walls and slabs), that are subject to an AMR. The staff requests that the applicant provide a summary of the list of buildings or structures where fire barriers are credited, and the specific types of barriers at these locations in the plant’s fire protection program.