



Exelon Generation®

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10 CFR 50
10 CFR 51
10 CFR 54

June 14, 2012

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
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: 10 CFR 54.21(b) Annual Amendment to the Limerick Generating Station License
Renewal Application

Reference: Exelon Generation Company, LLC letter from Michael P. Gallagher to NRC
Document Control Desk, "Application for Renewed Operating Licenses", dated
June 22, 2011

In the Referenced letter, Exelon Generation Company, LLC (Exelon) submitted the License Renewal Application (LRA) for the Limerick Generating Station, Units 1 and 2 (LGS). The Enclosure to this letter provides the annual amendment to the LGS LRA in accordance with 10 CFR 54.21(b). This amendment identifies changes to the current licensing basis (CLB) that materially affect the contents of the LGS LRA. This amendment is required to be submitted each year following submittal of the LRA and at least three months before scheduled completion of NRC review of the LRA.

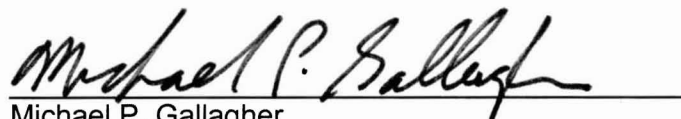
This letter and its enclosure contain no new or revised regulatory commitments.

If you have any questions, please contact Mr. Al Fulvio, Manager, Exelon License Renewal, at 610-765-5936.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 06-14-2012

Respectfully,

A handwritten signature in black ink, reading "Michael P. Gallagher", written over a horizontal line.

Michael P. Gallagher
Vice President - License Renewal Projects
Exelon Generation Company, LLC

Enclosure: 10 CFR 54.21(b) Update - Amendment to Limerick Generating Station LRA

cc: Regional Administrator – NRC Region I
NRC Project Manager (Safety Review), NRR-DLR
NRC Project Manager (Environmental Review), NRR-DLR
NRC Project Manager, NRR- DORL Limerick Generating Station
NRC Senior Resident Inspector, Limerick Generating Station
R. R. Janati, Commonwealth of Pennsylvania

ENCLOSURE

10 CFR 54.21(b) Update

Amendment to License Renewal Application for Limerick Generating Station

Introduction

The License Renewal Rule, 10 CFR 54.21(b), requires that each year following submittal of a License Renewal Application (LRA), an amendment must be submitted to identify changes to the facility current licensing basis (CLB) that materially impact the content of the LRA. In accordance with this requirement, Exelon Generation Company, LLC (Exelon) has completed the review of the Limerick Generating Station CLB changes since the submittal of the LRA. This Enclosure provides its results and identifies the section of the LRA that is impacted by the CLB changes.

Review Process

The annual update review is a procedurally controlled process to satisfy the requirements of 10 CFR 54.21(b). Specifically, the process is used to identify and evaluate changes to the plant CLB by reviewing plant documents, which include but are not limited to the following:

Design Change Packages (DCPs)
UFSAR Updates
Licensing Correspondence
Piping & Instrumentation Drawings (P&IDs)/Boundary Drawings
Generic Safety Issues
TLAAs

Changes to the text or supporting license renewal boundary drawings of the LRA as submitted on June 22, 2011 are identified as part of the review. These changes are then reviewed by a technical verification team to determine those changes to the CLB that materially affect the LRA for inclusion in this Enclosure. Changes to the LRA described in formal Exelon correspondence to the NRC, including RAI responses, are not included in the annual update because 1) these changes were not initiated due to changes in the Limerick CLB, and 2) this information has already been incorporated into the NRC's LRA review.

Review Results

The review identified one (1) design change that impacts the LRA. This design change resulted in a new material being added to the High Pressure Coolant Injection System (HPCI). The change and its impact on the LRA are discussed below.

High Pressure Coolant Injection System (HPCI) Engineering Change

Subsequent to the June 22, 2011, submittal of the LRA, Limerick implemented a design change that impacts the content of Table 3.2.2-3, High Pressure Coolant Injection System (HPCI). As a result of the addition of stainless steel high point vents and ball valves on the HPCI header, LRA Table 3.2.2-3 has been modified as shown below.

There were no other impacts to the LRA identified during this review.

As a result of the annual update review, LRA Table 3.2.2-3, pages 3.2-44 and 3.2-50, are revised as shown below with inserted text shown in bold italics:

Table 3.2.2-3 High Pressure Coolant Injection System (Continued)

Component Type	Intended Function	Material	Environment	Aging Effect Requiring Management	Aging Management Programs	NUREG-1801 Item	Table 1 Item	Notes
Piping, piping components, and piping elements	Leakage Boundary	Carbon Steel	Air - Indoor, Uncontrolled (External)	Loss of Material	External Surfaces Monitoring of Mechanical Components (B.2.1.25)	V.D2.E-26	3.2.1-40	A
			Air/Gas - Wetted (Internal)	Loss of Material	Inspection of Internal Surfaces in Miscellaneous Piping and Ducting Components (B.2.1.26)	V.D2.E-27	3.2.1-46	A
			Steam (Internal)	Loss of Material	One-Time Inspection (B.2.1.22)	V.D2.EP-60	3.2.1-16	A
					Water Chemistry (B.2.1.2)	V.D2.EP-60	3.2.1-16	A
				Wall Thinning	Flow-Accelerated Corrosion (B.2.1.10)	V.D2.E-07	3.2.1-11	A, 3
			Treated Water (Internal)	Loss of Material	One-Time Inspection (B.2.1.22)	V.D2.EP-60	3.2.1-16	A
					Water Chemistry (B.2.1.2)	V.D2.EP-60	3.2.1-16	A
		<i>Stainless Steel</i>	<i>Air - Indoor, Uncontrolled (External)</i>	<i>None</i>	<i>None</i>	<i>V.F.EP-18</i>	<i>3.2.1-63</i>	<i>A</i>
			<i>Treated Water (Internal)</i>	<i>Loss of Material</i>	<i>One-Time Inspection (B.2.1.22)</i>	<i>V.D2.EP-73</i>	<i>3.2.1-17</i>	<i>A</i>
					<i>Water Chemistry (B.2.1.2)</i>	<i>V.D2.EP-73</i>	<i>3.2.1-17</i>	<i>A</i>
	Pressure Boundary	Carbon Steel	Air - Indoor, Uncontrolled (External)	Loss of Material	External Surfaces Monitoring of Mechanical Components (B.2.1.25)	V.D2.E-26	3.2.1-40	A
			Air/Gas - Wetted (Internal)	Loss of Material	Inspection of Internal Surfaces in Miscellaneous Piping and Ducting Components (B.2.1.26)	V.D2.E-27	3.2.1-46	A
			Air - Indoor, Uncontrolled (External)	Loss of Material	External Surfaces Monitoring of Mechanical Components (B.2.1.25)	V.D2.E-26	3.2.1-40	A

Table 3.2.2-3 High Pressure Coolant Injection System (Continued)

Component Type	Intended Function	Material	Environment	Aging Effect Requiring Management	Aging Management Programs	NUREG-1801 Item	Table 1 Item	Notes
Valve Body	Pressure Boundary	Carbon Steel	Lubricating Oil (Internal)	Loss of Material	One-Time Inspection (B.2.1.22)	V.D2.EP-77	3.2.1-49	A
			Steam (Internal)	Loss of Material	One-Time Inspection (B.2.1.22)	V.D2.EP-60	3.2.1-16	A
					Water Chemistry (B.2.1.2)	V.D2.EP-60	3.2.1-16	A
				Wall Thinning	Flow-Accelerated Corrosion (B.2.1.10)	V.D2.E-07	3.2.1-11	A, 3
			Treated Water (External)	Loss of Material	One-Time Inspection (B.2.1.22)	V.D2.EP-60	3.2.1-16	A
					Water Chemistry (B.2.1.2)	V.D2.EP-60	3.2.1-16	A
		Stainless Steel	Treated Water (Internal)	Loss of Material	One-Time Inspection (B.2.1.22)	V.D2.EP-60	3.2.1-16	A
					Water Chemistry (B.2.1.2)	V.D2.EP-60	3.2.1-16	A
			<i>Air - Indoor, Uncontrolled (External)</i>	<i>None</i>	<i>None</i>	<i>V.F.EP-18</i>	<i>3.2.1-63</i>	<i>A</i>
			<i>Treated Water (Internal)</i>	<i>Loss of Material</i>	<i>One-Time Inspection (B.2.1.22)</i>	<i>V.D2.EP-73</i>	<i>3.2.1-17</i>	<i>A</i>
					<i>Water Chemistry (B.2.1.2)</i>	<i>V.D2.EP-73</i>	<i>3.2.1-17</i>	<i>A</i>
	Structural Support	Carbon Steel	Air - Indoor, Uncontrolled (External)	Loss of Material	External Surfaces Monitoring of Mechanical Components (B.2.1.25)	V.D2.E-26	3.2.1-40	A
			Air/Gas - Wetted (Internal)	Loss of Material	Inspection of Internal Surfaces in Miscellaneous Piping and Ducting Components (B.2.1.26)	V.D2.E-27	3.2.1-46	A