

June 21, 2012

Mr. Michael P. Gallagher
Vice President, License Renewal Projects
Exelon Generation Company, LLC
200 Exelon Way
Kennett Square, PA 19348

SUBJECT: REQUESTS FOR ADDITIONAL INFORMATION FOR THE REVIEW OF THE
LIMERICK GENERATING STATION, UNITS 1 AND 2, LICENSE RENEWAL
APPLICATION (TAC NOS. ME6555 AND ME6556)

Dear Mr. Gallagher:

By letter dated June 22, 2011, Exelon Generation Company, LLC submitted an application pursuant to Title 10 of the *Code of Federal Regulations* Part 54, to renew the operating licenses for Limerick Generating Station, Units 1 and 2, for review by the U.S. Nuclear Regulatory Commission (NRC or the staff). The staff is reviewing the information contained in the license renewal application and has identified, in the enclosure, areas where additional information is needed to complete the review.

These requests for additional information (RAIs) were discussed with Christopher Wilson, and a mutually agreeable date for the response is within 30 days from the date of this letter. If you have any questions, please contact me by telephone at 301-415-3733 or by e-mail at Robert.Kuntz@nrc.gov.

Sincerely,

/RA/

Robert F. Kuntz, Senior Project Manager
Projects Branch 1
Division of License Renewal
Office of Nuclear Reactor Regulation

Docket Nos. 50-352 and 50-353

Enclosure:
Requests for Additional
Information

cc w/encl: Listserv

Mr. Michael P. Gallagher
Vice President, License Renewal Projects
Exelon Generation Company, LLC
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NAME	YEdmonds	RKuntz	DMorey	RKuntz
DATE	06/ 19 /12	06/ 19 /12	06/ 20 /12	06/ 21 /12

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Letter to M. Gallagher from R Kuntz dated June 21, 2012

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LIMERICK GENERATING STATION LICENSE RENEWAL APPLICATION (TAC
NOS. ME6555, ME6556)

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LIMERICK GENERATING STATION
LICENSE RENEWAL APPLICATION
REQUESTS FOR ADDITIONAL INFORMATION

RAI B.2.1.12-3

Background

Commitment No. 12 and LRA Section A.2.1.12 were revised as a result of the responses to RAI B.2.1.12-1 and RAI B.2.1.12-2. The revision includes a commitment to, “[p]erform periodic inspections for loss of material in the Nonsafety-Related Service Water System at a minimum of five locations on each unit once every refueling cycle.” The response to RAI B.2.1.12-1 also provided the basis for why the opportunistic inspections of buried service water piping would be sufficient to provide adequate managing of the aging of the internal surfaces of the piping.

Issue

The staff agrees that (a) the opportunistic inspection of the buried piping was clarified to at least occur during the replacement of the residual heat removal service water (RHRSW) piping in the pipe tunnel between 2012 and 2015, (b) the detailed inspections of the piping removed during the replacement will provide supplemental information to assess the condition of the buried piping, and (c) degradation of the piping in aboveground portions of the system will be consistent with the buried piping given similar operating conditions. However, given the timing of the only certain inspection of the buried service water piping, the staff does not agree that there is a sufficient basis to establish a reasonable assurance that the buried service water piping will perform its current licensing basis function(s) throughout the period of extended operation. Nevertheless, the staff believes that the five inspections per unit per refueling outage interval in the nonsafety-related portions of the service water system, given similar operating conditions, would provide sufficient timely data to understand the condition of the internal surfaces of the buried piping.

The Updated Final Safety Analysis Report (UFSAR) supplement, as amended, does not provide a link between the inspections of the nonsafety-related portions of the service water system and the conditions of the buried piping. Lacking this link, the staff does not believe that the UFSAR supplement provides a sufficient summary description of the activities for managing the aging of the buried service water piping as required by 10 CFR 54.21(d).

Request

- (a) Revise LRA Section A.2.1.12 to establish that the nonsafety-related piping inspections are necessary to provide a sufficient understanding of the buried service water piping conditions throughout the period of extended operation.
- (b) State how inspection locations will be selected to ensure that conditions are similar between the nonsafety-related piping inspections and buried service water piping (e.g., flow, temperature) such as they impact MIC.

ENCLOSURE

Alternatively,

- (c) Revise Commitment No. 12 and LRA Section A.2.1.12 to conduct internal visual and/or volumetric inspections of other portions of the service water system that would be sufficient to provide timely data to understand the condition of the internal surfaces of the buried piping throughout the period of extended operation.