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10 CFR 50  
10 CFR 51  
10 CFR 54

February 21, 2013

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:** Exelon Generation Company, LLC Review of the Safety Evaluation Report related to the Limerick Generating Station License Renewal Application

**Reference:** 1. Exelon Generation Company, LLC letter from Michael P. Gallagher to NRC Document Control Desk, "Application for Renewed Operating Licenses", dated June 22, 2011  
2. Letter from John W. Lubinski (NRC) to Michael P. Gallagher (Exelon), "Safety Evaluation Report Related to the License Renewal of Limerick Generating Station, Units 1 and 2 (TAC Nos. ME6555, ME6556)", dated January 10, 2013

In the Reference 1 letter, Exelon Generation Company, LLC (Exelon) submitted the License Renewal Application (LRA) for the Limerick Generating Station, Units 1 and 2 (LGS).

In the Reference 2 letter, the U.S. Nuclear Regulatory Commission issued the Safety Evaluation Report (SER) related to the LGS License Renewal Application. Exelon has completed its review of the SER and provides comments contained within the Enclosure.

There are no other new or revised regulatory commitments contained in this letter.

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

Respectfully,

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

Enclosure:     Comments regarding the Safety Evaluation Report related to the Limerick  
Generating Station License Renewal Application.

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**

**Comments regarding the Safety Evaluation Report related to the Limerick Generating Station License Renewal Application.**

The table on the following pages contains comments and suggestions for NRC staff consideration, based upon Exelon's review of the Limerick Generating Station, Units 1 and 2 Safety Evaluation (SER).

An item number is provided in column 1, the SER Section number is given in column 2, the SER page number is listed in column 3 and the comment is provided in column 4.

**Comments regarding the Safety Evaluation Report related to the Limerick Generating Station License Renewal Application.**

Where suggested changes to the SER are provided, they are highlighted with ***bolded italics*** for inserted text and strikethroughs for deleted text.

#	Section #	Page #	Comment
1.	3.0.3.1.18	3-58	<p>Delete the following in the third paragraph:</p> <p><del>"For penetrations 238 and 239 associated with the RHR system relief valves, the staff noted that Table 6.2-25, Note 23 of the UFSAR, indicates that through modifications performed at the first refueling the relief valve discharge line isolation valves are also subject either to local testing or removal and bench testing for subsequent LLRTs. Penetrations 238 and 239 are comprised by a "Double O-Ring with Seal Assembly," where typically, the seals per Table 6.2-25, Note 23 of the UFSAR, will be leak rate tested by pressurizing between the O-Rings."</del></p> <p>Comment: As discussed in Exelon's response to RAI B.2.1.33-1, penetrations 238 and 239 include a suppression pool water seal, at least one isolation valve outside containment, and a closed system outside containment. Penetrations 238 and 239 are correctly discussed in the second paragraph.</p>
2.	3.0.3.2.13	3-129	<p>SER states that: "According to ASME Code Section XI, Subsection IWE, each "inspection period" and "inspection interval" are of 40 months and 120 months duration, respectively."</p> <p>Comment: Stating that each inspection period is 40 months in duration according to IWE Code is incorrect. ASME Code Section XI, Subsection IWE-2411 describes an Inspection Program B interval as 10 years. IWE-2412 and Table IWE-2412-1 indicate there are three periods in an Inspection Program B interval. Table IWE-2412-1 also indicates that periods of 4 years in duration are acceptable. LGS outages are conducted every 2 years and therefore some periods could be 4 years in duration.</p>
3.	3.0.3.2.13	3-133	<p>Delete the last part of the SER statement as shown in strikethrough below: "The staff reviewed the revised Commitment No. 30, as noted above, and found it acceptable because: (1) The applicant plans to recoat all local areas (less than 2.5 inches in diameter) of corrosion (pitting corrosion) that are greater than 50 mils plate thickness loss in the outage identified. <del>in 2012 for Unit 1, and 2013 for Unit 2.</del>"</p> <p>Comment: As stated in Commitment No. 30, the coating maintenance plan will be initiated in the 2012 refueling outage for unit 1 and the 2013 refueling outage for unit 2. Our commitment was revised in our September 12, 2012 letter to the staff to require recoating local areas (less than 2.5 inches in diameter) of general corrosion that are greater than 50 mils plate thickness loss in the outage they are identified. The commitment revision occurred after the Unit 1 outage in 2012 and therefore not all local areas of general corrosion greater than 50 mils plate thickness loss were recoated in that outage.</p>

**Comments regarding the Safety Evaluation Report related to the Limerick Generating Station License Renewal Application.**

Where suggested changes to the SER are provided, they are highlighted with ***bolded italics*** for inserted text and strikethroughs for deleted text.

#	Section #	Page #	Comment
4.	3.7	3-412	<p>Delete the part of the SER statement as shown in strikethrough below:</p> <p>"The staff reviewed the information in LRA Section 3, "Aging Management Review Results," and LRA Appendix B, "Aging Management Programs and Activities." On the basis of its review of the AMR results and AMPs, the staff concludes, <del>with the exception of Open Items 3.0.3.2.13-1 and 3.0.5-1</del>, that the applicant has demonstrated that the aging effects will be adequately managed so that the intended function(s) will be maintained consistent with the CLB for the period of extended operation, as required by 10 CFR 54.21 (a)(3). The staff also reviewed the applicable UFSAR supplement program summaries and concludes that the supplement adequately describes the AMPs credited for managing aging, as required by 10 CFR 54.21 (d).</p> <p>With regard to these matters, the staff concludes, <del>with the exception of Open Item 3.0.3.2.13-1</del> that there is reasonable assurance that the applicant will continue to conduct the activities authorized by the renewed licenses in accordance with the CLB, and any changes made to the CLB, in order to comply with 10 CFR 54.21 (a)(3), are in accordance with the Atomic Energy Act of 1954, as amended, and NRC regulations."</p> <p>Comment: Open items 3.0.3.2.13-1 and 3.0.5-1 are closed.</p>
5.	Appendix A, Item #38	A-24	<p>Comment: Commitment #38 – Entry for the column entitled "Enhancements or Implementation Schedule."</p> <p>The program for commitment #38 does not have enhancements.</p> <p>The entry for this column should be revised to align with the LRA Appendix A, Table A.5.</p> <p>Delete: <del>Program to be enhanced before the period of extended operation.</del> Suggested reword: <b><i>Program and initial inspections to be implemented before the period of extended operation.</i></b></p>