

From: Bower, Fred
Sent: Monday, July 13, 2015 2:32 PM
To: aceactivists@comcast.net
Cc: Fannon, Matthew; Schroeder, Daniel; Krohn, Paul; Screnci, Diane; OPA1 RESOURCE; Sheehan, Neil; Tifft, Doug; Klukan, Brett; Nieh, Ho; Scott, Michael; Barber, Scott; Bower, Fred; Ennis, Rick
Subject: RE: ACE Question: NRC Testing? [EDATS R1-2015-0234]
Attachments: ML15181A430.pdf

The Alliance for a Clean Environment (ACE)

ACE – Question: NRC Testing - [EDATS R1-2015-0234]

Dear Mrs. Cuthbert (ACE),

I am writing in response to your below July 12, 2015, email to the resident inspector at Limerick, Matt Fannon. In this email, you questioned Mr. Fannon's role in the testing of Limerick's equipment and systems, as well as NRC approval of experiments related to de-energized motor operated valves (MOVs) at Limerick. Your email will be entered into ADAMS as a public document.

I have attached the press release (ML15181A430) that announced Mr. Fannon's selection as the new resident inspector assigned to Limerick. As the press release stated, the resident inspectors conduct inspections, monitor significant work projects, and interact with plant workers and the public, as necessary, to carry out NRC's safety mission.

Regarding your questions pertaining to equipment operations, NRC resident inspectors do not operate equipment and/or systems at licensee facilities. That role is reserved for utility staff specifically trained in equipment and/or system operation. During the conduct of onsite inspections, NRC inspectors will observe, assess, and report on system operation which is an important role they serve in being the "eyes and ears" of the NRC. These important observations and assessments are subsequently documented in NRC inspection reports that are available at www.nrc.gov.

Regarding your questions pertaining to experiments on MOVs at Limerick, we believe you are referring to a previous licensing action related to a TS amendment that was issued on March 13, 2013 (ML13023A410). The amendment allowed Exelon to relocate the Limerick MOVs' thermal overload protection from the plant technical specifications to the Technical Requirements Manual, an important document that specifies certain equipment operating conditions. The amendment was approved because the thermal overload function was not required by 10 CFR 50.36 and therefore did not need to be included in the technical specifications. As stated in the safety evaluation, future changes to the relocated requirements are subject to the provisions in 10 CFR 50.59, which are reviewed under inspection procedure 71111.17T as discussed above. We noted Mr. Paul Krohn's email (ML15057A237) previously communicated this to ACE in a comprehensive response to questions about thermal overload protection for motor operated valves at Limerick.

We appreciate your questions and hope you find our answers responsive.

Sincerely,

Fred Bower

USNRC Region I Branch Chief with Oversight Responsibility for Limerick, Peach Bottom and Susquehanna

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From: aceactivists@comcast.net [<mailto:aceactivists@comcast.net>]

Sent: Sunday, July 12, 2015 3:54 PM

To: Fannon, Matthew

Subject: [External_Sender] NRC Testing?

Matt,

We were happy to see that the Reading Eagle announced on 7-5-15 that you are Limerick's new resident inspector and that your job includes interacting with the public, according to the quote from NRC.

We also see that your job includes periodic testing of Limerick's equipment and systems.

- Are you actually doing testing for NRC?
- If so, exactly what will you be testing?

As you know we are very concerned about the recent experiments that NRC has approved at Limerick regarding the de-energizing of the motor operated valves and permanent placement in open and closed positions.

- Is this one of the systems you are testing?
- Can you explain how Exelon compensates for the lack of motor operation?
- Can you confirm that the new modifications will work in an emergency situation, not just in the short term?

Thank you,
Donna Cuthbert