

February 27, 2018

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

Limerick Generating Station, Units 1 and 2
Renewed Facility Operating License Nos. NPF-39 and NPF-85
NRC Docket Nos. 50-352 and 50-353

Subject: Request for Implementation Date Extension Clarification
Application to Revise Technical Specifications to Adopt TSTF-542, "Reactor Pressure Vessel Water Inventory Control," Revision 2

- References:
1. Letter from James Barstow (Exelon Generation Company, LLC) to U.S. Nuclear Regulatory Commission, "Application to Revise Technical Specifications to Adopt TSTF-542, 'Reactor Pressure Vessel Water Inventory Control,' Revision 2," dated July 19, 2017 (ADAMS Accession No. ML17200D096).
 2. Letter from David P. Helker (Exelon Generation Company, LLC) to U.S. Nuclear Regulatory Commission, "Request for Implementation Date Extension, Application to Revise Technical Specifications to Adopt TSTF-542, 'Reactor Pressure Vessel Water Inventory Control,' Revision 2," dated February 19, 2018 (ADAMS Accession No. ML18050A025).

By letter dated July 19, 2017 (ADAMS Accession No. ML17200D096) (Reference 1), Exelon Generation Company, LLC (Exelon), requested approval to adopt Technical Specifications Task Force (TSTF) Traveler TSTF-542, "Reactor Pressure Vessel Water Inventory Control," Revision 2, which changes the Technical Specifications (TSs) for Limerick Generating Station (LGS), Units 1 and 2.

By letter dated February 19, 2018, (ADAMS Accession No. ML18050A025) (Reference 2), Exelon requested that the proposed amendments, once approved, be implemented on both units no later than startup from the Spring 2019 Unit 2 refueling outage.

For clarification purposes, Exelon requests that the proposed amendments, once approved, be implemented on both units no later than May 31, 2019.

Exelon has reviewed the information supporting a finding of no significant hazards consideration, and the environmental consideration, that were previously provided to the NRC in Attachment 1 of the Reference 1 letter. Exelon has concluded that the information provided in this letter does not affect the bases for concluding that the proposed license amendment does not involve a significant hazards consideration under the standards set forth in 10 CFR 50.92. In addition, Exelon has concluded that the information in this letter does not affect the bases for concluding that neither an environmental impact statement

nor an environmental assessment needs to be prepared in connection with the proposed amendment.

There are no regulatory commitments in this letter.

In accordance with 10 CFR 50.91, "Notice for public comment; State consultation," paragraph (b), Exelon is notifying the Commonwealth of Pennsylvania by transmitting a copy of this letter to the designated State Official.

If you have any questions or require additional information, please contact Glenn Stewart at 610-765-5529.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 27th day of February 2018.

Respectfully,



David P. Helker
Manager, Licensing and Regulatory Affairs
Exelon Generation Company, LLC

cc: Regional Administrator - NRC Region I
NRC Senior Resident Inspector - Limerick Generating Station
NRC Project Manager, NRR - Limerick Generating Station
Director, Bureau of Radiation Protection - Pennsylvania
Department of Environmental Protection