

10 CFR 50.90

November 25, 2019

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: License Amendment Request
Proposed Clarification Changes to Technical Specifications to Support
Implementation of 10 CFR 50.69

Pursuant to 10 CFR 50.90, "Application for amendment of license or construction permit," Exelon Generation Company, LLC (Exelon), proposes changes to the Technical Specifications (TS), Appendix A of Renewed Facility Operating License Nos. NPF-39 and NPF-85 for Limerick Generating Station (LGS), Units 1 and 2, respectively.

The proposed changes involve clarification of TS 4.0.5 requirements to reflect the allowance provided in 10 CFR 50.69(b)(1)(v) to perform alternative treatment of structures, systems, and components (SSCs) that have been categorized as Risk-Informed Safety Class (RISC) of RISC-3 in accordance with the requirements of 10 CFR 50.69 in lieu of performing inspection and testing in accordance with the requirements of 10 CFR 50.55a(f), Inservice Testing (IST), and 10 CFR 50.55a(g), Inservice Inspection (ISI).

Evaluation of the proposed changes is provided in Attachment 1. Markups of the proposed TS changes are provided in Attachment 2. Markups of the proposed TS Bases changes are provided in Attachment 3 for information only.

Exelon has concluded that the proposed changes present no significant hazards consideration under the standards set forth in 10 CFR 50.92.

This amendment request contains no regulatory commitments.

Exelon requests approval of the proposed amendment by November 25, 2020. Upon NRC approval, the amendment shall be implemented within 60 days of issuance.

License Amendment Request
Clarification Changes to Support
Implementation of 10 CFR 50.69
Docket Nos. 50-352 and 50-353
November 25, 2019
Page 2

The proposed changes have been reviewed and recommended for approval by the Plant Operations Review Committee in accordance with the Exelon Quality Assurance Program.

In accordance with 10 CFR 50.91, "Notice for public comment; State consultation," paragraph (b), Exelon is notifying the Commonwealth of Pennsylvania of this application for license amendment by transmitting a copy of this letter and its attachments 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 25th day of November 2019.

Respectfully,



David P. Helker
Sr. Manager, Licensing
Exelon Generation Company, LLC

Attachments: 1. Evaluation of Proposed Changes
 2. Proposed Technical Specifications Markup Pages

cc:	USNRC Region I, Regional Administrator	w/ attachments
	USNRC Project Manager, LGS	"
	USNRC Senior Resident Inspector, LGS	"
	Director, Bureau of Radiation Protection - Pennsylvania Department of Environmental Protection	"

ATTACHMENT 1

License Amendment Request

Limerick Generating Station, Units 1 and 2

Docket Nos. 50-352 and 50-353

EVALUATION OF PROPOSED CHANGES

Subject: Proposed Clarification Changes to Technical Specifications to Support Implementation of 10 CFR 50.69

1.0 SUMMARY DESCRIPTION

2.0 DETAILED DESCRIPTION

3.0 TECHNICAL EVALUATION

4.0 REGULATORY EVALUATION

4.1 Applicable Regulatory Requirements/Criteria

4.2 Precedent

4.3 No Significant Hazards Consideration

4.4 Conclusions

5.0 ENVIRONMENTAL CONSIDERATION

6.0 REFERENCES

1.0 SUMMARY DESCRIPTION

Pursuant to 10 CFR 50.90, "Application for amendment of license or construction permit," Exelon Generation Company, LLC (Exelon), proposes changes to the Technical Specifications (TS), Appendix A of Renewed Facility Operating License Nos. NPF-39 and NPF-85 for Limerick Generating Station (LGS), Units 1 and 2, respectively.

The proposed changes involve clarification of TS 4.0.5 requirements to reflect the allowance provided in 10 CFR 50.69(b)(1)(v) to perform alternative treatment of structures, systems, and components (SSCs) that have been categorized as Risk-Informed Safety Class (RISC) of RISC-3 in accordance with the requirements of 10 CFR 50.69 in lieu of performing inspection and testing in accordance with the requirements of 10 CFR 50.55a(f), Inservice Testing (IST), and 10 CFR 50.55a(g), Inservice Inspection (ISI).

Evaluation of the proposed changes is provided in Attachment 1. Markups of the proposed TS changes are provided in Attachment 2. Markups of the proposed TS Bases changes are provided in Attachment 3 for information only.

2.0 DETAILED DESCRIPTION

The current LGS TS 4.0.5 states the following:

The INSERVICE TESTING PROGRAM is the licensee program that fulfills the requirements of 10 CFR 50.55a(f). The Inservice Inspection Program is the licensee program that fulfills the requirements of 10 CFR 50.55a(g).

The provisions of SR 4.0.2 and SR 4.0.3 do not apply to the INSERVICE TESTING PROGRAM unless there is a specific SR referencing usage of the program.

The following clarification is proposed to TS 4.0.5 as noted in the TS markups provided in Attachment 2:

Structures, systems, and components (SSCs) within the INSERVICE TESTING PROGRAM shall be tested in accordance with the requirements of 10 CFR 50.55a(f). SSCs within the Inservice Inspection Program shall be inspected in accordance with the requirements of 10 CFR 50.55a(g). The provisions of SR 4.0.2 and SR 4.0.3 do not apply to the INSERVICE TESTING PROGRAM unless there is a specific SR referencing usage of the program.

SSCs that have been categorized as Risk-Informed Safety Class (RISC) of RISC-3 in accordance with 10 CFR 50.69, and removed from the INSERVICE TESTING PROGRAM or Inservice Inspection Program in accordance with 10 CFR 50.69(b)(1)(v), are subject to the alternative treatment requirements specified in 10 CFR 50.69(d)(2). The SSCs must continue to meet the acceptance criteria specified in the applicable technical specification surveillance requirements; however, the surveillance frequency is determined as part of the alternative treatment.

3.0 TECHNICAL EVALUATION

By Reference letter dated July 31, 2018, the NRC issued Amendment Nos. 230 and 193 to Renewed Facility Operating License Nos. NPF-39 and NPF-85 for the LGS, Units 1 and 2, respectively. The amendments added a new license condition to the LGS, Unit 1 and Unit 2 Renewed Facility Operating Licenses to allow the implementation of the risk-informed categorization and treatment of structures, systems or components (SSCs) in accordance with the requirements of 10 CFR 50.69.

10 CFR 50.69(b), *Applicability and scope of risk-informed treatment of SSCs and submittal/approval process*, states: (1) A holder of a license to operate a light water reactor (LWR) nuclear power plant under this part; a holder of a renewed LWR license under part 54 of this chapter; an applicant for a construction permit or operating license under this part; or an applicant for a design approval, a combined license, or manufacturing license under part 52 of this chapter; may voluntarily comply with the requirements in this section as an alternative to compliance with the following requirements for RISC-3 and RISC-4 SSCs:

(v) The inservice testing requirements in 10 CFR 50.55a(f); the inservice inspection, and repair and replacement (with the exception of fracture toughness), requirements for ASME Class 2 and Class 3 SSCs in 10 CFR 50.55a(g); and the electrical component quality and qualification requirements in Section 4.3 and 4.4 of IEEE 279, and Sections 5.3 and 5.4 of IEEE 603-1991, as incorporated by reference in 10 CFR 50.55a(h).

10 CFR 50.69(d), *Alternative treatment requirements, Section (2), RISC-3 SSCs*. The licensee or applicant shall ensure, with reasonable confidence, that RISC-3 SSCs remain capable of performing their safety-related functions under design basis conditions, including seismic conditions and environmental conditions and effects throughout their service life. The treatment of RISC-3 SSCs must be consistent with the categorization process. Inspection and testing, and corrective action shall be provided for RISC-3 SSCs.

(i) Inspection and testing. Periodic inspection and testing activities must be conducted to determine that RISC-3 SSCs will remain capable of performing their safety-related functions under design basis conditions; and

(ii) Corrective action. Conditions that would prevent a RISC-3 SSC from performing its safety-related functions under design basis conditions must be corrected in a timely manner. For significant conditions adverse to quality, measures must be taken to provide reasonable confidence that the cause of the condition is determined and corrective action taken to preclude repetition.

The 10 CFR 50.69 Final Rule was published in Federal Register (FR), Volume 69, Page 68008 (i.e., 69 FR 68008) dated November 22, 2004. Regarding the exclusion of RISC-3 SSCs from the special treatment requirements of 10 CFR 50.55a(f) and (g), 69 FR 68025 states the following:

Section 50.69(b)(2)(iv) [50.69(b)(1)(v)] removes RISC-3 SSCs from the scope of certain provisions of § 50.55a, relating to Codes and Standards. The provisions being removed are those that relate to “treatment” aspects, such as inspection and testing, but not those pertaining to design requirements established in § 50.55a. Each of the subsections being removed is discussed in the paragraphs below.

Section 50.55a(f) incorporates by reference provisions of the ASME Code, as endorsed by NRC, that contains inservice testing requirements. These are special treatment requirements. Through this rulemaking, RISC-3 SSCs are removed from the scope of these requirements and instead are subject to the requirements in § 50.69(d)(2). For the reasons discussed in Section III.4.0 [of 69 FR 68008], the Commission has determined that for low safety significant SSCs, it is not necessary to impose the specific detailed provisions of the Code, as endorsed by NRC, and these requirements can be replaced by the more “high-level” alternative treatment requirements, which allow greater flexibility to licensees in implementation.

Section 50.55a(g) incorporates by reference provisions of the ASME Code, as endorsed by NRC, that contain the inservice inspection, and repair and replacement requirements for ASME Class 2 and Class 3 SSCs. The Commission will not remove the repair and replacement provisions of the ASME Code required by § 50.55a(g) for ASME Class 1 SSCs, even if they are categorized as RISC-3, because those SSCs constitute principal fission product barriers as part of the reactor coolant system or containment. For Class 2 and Class 3 SSCs that are shown to be of low safety significance and categorized as RISC-3, the additional assurance obtained from the specific provisions of the ASME Code is not considered necessary. However, the Commission has not removed the requirements for fracture toughness specified for ASME Class 2 and Class 3 SSCs because fracture toughness is a significant design parameter for the material used to construct the SSC. Fracture toughness is a property of the material that prevents premature failure of an SSC at abrupt geometry changes, or at small undetected flaws. Adequate fracture toughness of SSCs is necessary to prevent common cause failures due to design basis events, such as earthquakes.

As noted above, LGS has been given approval by the NRC to implement 10 CFR 50.69 at the station. SSCs that have been categorized as RISC-3 in accordance with 10 CFR 50.69 may be removed from the special treatment requirements of 10 CFR 50.55a(f) and (g), and instead, be subject to alternative treatment requirements of 10 CFR 50.69(d)(2). However, the LGS, Unit 1 and Unit 2 TS contain surveillance requirements applicable to SSCs that are either currently categorized as RISC-3 or have the possibility of being categorized as RISC-3 in the future. These surveillances require testing pursuant to TS 4.0.5. LGS TS 4.0.5 states that the INSERVICE TESTING PROGRAM is the licensee program that fulfills the requirements of 10 CFR 50.55a(f) and the Inservice Inspection Program is the licensee program that fulfills the requirements of 10 CFR 50.55a(g).

As noted in Section 2.0 above, the following information is proposed to be added to TS 4.0.5 as noted in the TS markups provided in Attachment 2:

Structures, systems, and components (SSCs) within the INSERVICE TESTING PROGRAM shall be tested in accordance with the requirements of 10 CFR 50.55a(f). SSCs within the Inservice Inspection Program shall be inspected in accordance with the requirements of 10 CFR 50.55a(g). The provisions of SR 4.0.2 and SR 4.0.3 do not apply to the INSERVICE TESTING PROGRAM unless there is a specific SR referencing usage of the program.

SSCs that have been categorized as Risk-Informed Safety Class (RISC) of RISC-3 in accordance with 10 CFR 50.69, and removed from the INSERVICE TESTING PROGRAM or Inservice Inspection Program in accordance with 10 CFR 50.69(b)(1)(v), are subject to the alternative treatment requirements specified in 10 CFR 50.69(d)(2). The SSCs must continue to meet the acceptance criteria specified in the applicable technical specification surveillance requirements; however, the surveillance frequency is determined as part of the alternative treatment.

The proposed addition to TS 4.0.5 provides the clarification that, even though the SSCs are subject to the acceptance criteria in the applicable TS surveillance requirements, if they have been categorized as RISC-3 in accordance with 10 CFR 50.69, then they are subject to testing, including the frequency of testing, and inspection that fulfils the alternative treatment requirements of 10 CFR 50.69(d)(2) rather than the requirements of 10 CFR 50.55a(f) or (g).

The proposed changes do not involve any physical changes to plant SSCs or the way SSCs are operated, controlled, maintained, or modified. The proposed changes do not involve a change to any safety limits, limiting safety system settings, limiting control settings, limiting conditions for operation, design features, or administrative controls required by 10 CFR 50.36.

4.0 REGULATORY EVALUATION

4.1 Applicable Regulatory Requirements/Criteria

In Title 10 of the Code of Federal Regulations (10 CFR) Section 50.36, the Nuclear Regulatory Commission (NRC) established its regulatory requirements related to the content of TSs. Pursuant to 10 CFR 50.36, TSs are required to include items in the following five specific categories: (1) safety limits, limiting safety system settings, and limiting control settings; (2) limiting conditions for operation; (3) surveillance requirements (SRs); (4) design features; and (5) administrative controls. The proposed changes continue to satisfy this requirement in that no changes are being made to the acceptance criteria specified in any surveillance requirement. Only a clarification is being provided in TS 4.0.5 that SSCs categorized as RISC-3 are tested or inspected in accordance with the alternative treatment requirements of 10 CFR 50.69(d)(2).

10 CFR 50.69(b), *Applicability and scope of risk-informed treatment of SSCs and submittal/approval process*, states: (1) A holder of a license to operate a light water reactor (LWR) nuclear power plant under this part; a holder of a renewed LWR license under part 54 of

this chapter; an applicant for a construction permit or operating license under this part; or an applicant for a design approval, a combined license, or manufacturing license under part 52 of this chapter; may voluntarily comply with the requirements in this section as an alternative to compliance with the following requirements for RISC-3 and RISC-4 SSCs:

(v) The inservice testing requirements in 10 CFR 50.55a(f); the inservice inspection, and repair and replacement (with the exception of fracture toughness), requirements for ASME Class 2 and Class 3 SSCs in 10 CFR 50.55a(g); and the electrical component quality and qualification requirements in Section 4.3 and 4.4 of IEEE 279, and Sections 5.3 and 5.4 of IEEE 603-1991, as incorporated by reference in 10 CFR 50.55a(h).

10 CFR 50.69(d), *Alternative treatment requirements, Section (2) RISC-3 SSCs*. The licensee or applicant shall ensure, with reasonable confidence, that RISC-3 SSCs remain capable of performing their safety-related functions under design basis conditions, including seismic conditions and environmental conditions and effects throughout their service life. The treatment of RISC-3 SSCs must be consistent with the categorization process. Inspection and testing, and corrective action shall be provided for RISC-3 SSCs.

(i) Inspection and testing. Periodic inspection and testing activities must be conducted to determine that RISC-3 SSCs will remain capable of performing their safety-related functions under design basis conditions; and

(ii) Corrective action. Conditions that would prevent a RISC-3 SSC from performing its safety-related functions under design basis conditions must be corrected in a timely manner. For significant conditions adverse to quality, measures must be taken to provide reasonable confidence that the cause of the condition is determined and corrective action taken to preclude repetition.

By the Reference letter, LGS has been approved by the NRC to implement 10 CFR 50.69 at the site. The proposed changes continue to meet the requirements of 10 CFR 50.69 in that SSCs categorized as RISC-3 are tested or inspected in accordance with the alternative treatment requirements of 10 CFR 50.69(d)(2).

4.2 Precedent

None

4.3 No Significant Hazards Consideration

The proposed changes involve clarification of Technical Specification (TS) 4.0.5 requirements to reflect the allowance provided in 10 CFR 50.69(b)(1)(v) to perform alternative treatment of structures, systems, and components (SSCs) that have been categorized as Risk-Informed Safety Class (RISC)-3 in accordance with the requirements of 10 CFR 50.69 in lieu of performing inspection and testing in accordance with the requirements of 10 CFR 50.55a(f), Inservice Testing (IST), and 10 CFR 50.55a(g), Inservice Inspection (ISI).

Exelon has evaluated whether a significant hazards consideration is involved with the proposed amendment by focusing on the three standards set forth in 10 CFR 50.92, "Issuance of amendment," as discussed below:

1. Do the proposed changes involve a significant increase in the probability or consequences of an accident previously evaluated?

Response: No.

The proposed changes are administrative in nature and do not impact the physical configuration or function of plant structures, systems, or components (SSCs) or the way SSCs are operated, maintained or modified. Only a clarification is being provided in TS 4.0.5 that SSCs categorized as RISC-3 are tested or inspected in accordance with the alternative treatment requirements of 10 CFR 50.69(d)(2). The proposed changes do not impact the initiators or assumptions of analyzed events, nor do they impact mitigation of accidents or transient events. Therefore, the proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Do the proposed changes create the possibility of a new or different kind of accident from any accident previously evaluated?

Response: No.

The proposed changes are administrative in nature and do not alter plant configuration, require that new plant equipment be installed, alter assumptions made about accidents previously evaluated, or impact the function of plant SSCs or the way SSCs are operated, maintained or modified. Only a clarification is being provided in TS 4.0.5 that SSCs categorized as RISC-3 are tested or inspected in accordance with the alternative treatment requirements of 10 CFR 50.69(d)(2). Therefore, the proposed changes do not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. Do the proposed changes involve a significant reduction in a margin of safety?

Response: No.

The proposed changes are administrative in nature and do not involve any physical changes to plant SSCs or the way SSCs are operated, maintained or modified. Only a clarification is being provided in TS 4.0.5 that SSCs categorized as RISC-3 are tested or inspected in accordance with the alternative treatment requirements of 10 CFR 50.69(d)(2). The proposed changes do not involve a change to any safety limits, limiting safety system settings, limiting conditions for operation, or design parameters for any SSC. The proposed changes do not impact any safety analysis assumptions and do not

involve a change in initial conditions, system response times, or other parameters affecting an accident analysis. Therefore, the proposed changes do not involve a significant reduction in a margin of safety.

Based on the above, Exelon concludes that the proposed amendment presents no significant hazards consideration under the standards set forth in 10 CFR 50.92(c), and, accordingly, a finding of no significant hazards consideration is justified.

4.4 Conclusions

In conclusion, based on the considerations discussed above, (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

5.0 ENVIRONMENTAL CONSIDERATION

The proposed changes would change a requirement with respect to installation or use of a facility component located within the restricted area, as defined in 10 CFR 20, or would change an inspection or surveillance requirement. However, the proposed changes do not involve (i) a significant hazards consideration, (ii) a significant change in the types or significant increase in the amounts of any effluents that may be released offsite, or (iii) a significant increase in individual or cumulative occupational radiation exposure. Accordingly, the proposed changes meet the eligibility criterion for categorical exclusion set forth in 10 CFR 51.22(c)(9). Therefore, pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the proposed changes.

6.0 REFERENCES

Letter from V. Sreenivas, U.S. Nuclear Regulatory Commission, to B. Hanson, Exelon Generation Company, LLC, "Limerick Generating Station, Units 1 and 2 - Issuance of Amendment Nos. 230 and 193 to Adopt Title 10 of the Code of Federal Regulations Section 50.69, 'Risk-Informed Categorization and Treatment of Structures, Systems and Components for Nuclear Power Reactors' (CAC Nos. MF9873 and MF9874; EPID L-2017-LLA-0275)," dated July 31, 2018 (ADAMS Accession No. ML18165A162).

ATTACHMENT 2

License Amendment Request

**Limerick Generating Station, Units 1 and 2
Docket Nos. 50-352 and 50-353**

Proposed Administrative Changes to Technical Specifications

Proposed Technical Specifications Markup Pages

Unit 1 TS Pages

3/4 0-2

Unit 2 TS Pages

3/4 0-2

APPLICABILITY

SURVEILLANCE REQUIREMENTS

4.0.1 Surveillance Requirements shall be met during the OPERATIONAL CONDITIONS or other specified conditions in the Applicability for individual Limiting Conditions for Operation, unless otherwise stated in the Surveillance Requirement. Failure to meet a Surveillance, whether such failure is experienced during the performance of the Surveillance or between performances of the Surveillance, shall be failure to meet the Limiting Condition for Operation. Failure to perform a Surveillance within the specified Surveillance time interval and allowed extension per Specification 4.0.2, shall be failure to meet the Limiting Condition for Operation except as provided in Specification 4.0.3. Surveillances do not have to be performed on inoperable equipment or variables outside specified limits.

4.0.2 Each Surveillance Requirement shall be performed within the specified surveillance time interval with a maximum allowable extension not to exceed 25% of the surveillance interval.

4.0.3 If it is discovered that a Surveillance was not performed within its specified Surveillance time interval and allowed extension per Specification 4.0.2, then compliance with the requirement to declare the Limiting Condition for Operation not met may be delayed, from the time of discovery, up to 24 hours or up to the limit of the specified Surveillance time interval, whichever is greater. This delay period is permitted to allow performance of the Surveillance. The delay period is only applicable when there is a reasonable expectation the surveillance will be met when performed. A risk evaluation shall be performed for any Surveillance delayed greater than 24 hours and the risk impact shall be managed.

If the Surveillance is not performed within the delay period, the Limiting Condition for Operation must immediately be declared not met, and the applicable ACTION requirements must be entered.

When the Surveillance is performed within the delay period and the Surveillance is not met, the Limiting Condition for Operation must immediately be declared not met, and the applicable ACTION requirements must be entered.

4.0.4 Entry into an OPERATIONAL CONDITION or other specified condition in the Applicability of a Limiting Condition for Operation shall only be made when the Limiting Condition for Operation's Surveillance Requirements have been met within their Surveillance time interval, except as provided in Specification 4.0.3. When a Limiting Condition for Operation is not met due to its Surveillance Requirements not having been met, entry into an OPERATIONAL CONDITION or other specified condition in the Applicability shall only be made in accordance with Specification 3.0.4.

This provision shall not prevent entry into OPERATIONAL CONDITIONS or other specified conditions in the Applicability that are required to comply with ACTION requirements or that are part of a shutdown of the unit.

INSERT

4.0.5 Inservice Inspection and Inservice Testing Program

~~The INSERVICE TESTING PROGRAM is the licensee program that fulfills the requirements of 10 CFR 50.55a(f). The Inservice Inspection Program is the licensee program that fulfills the requirements of 10 CFR 50.55a(g).~~

~~The provisions of SR 4.0.2 and SR 4.0.3 do not apply to the INSERVICE TESTING PROGRAM unless there is a specific SR referencing usage of the program.~~

APPLICABILITY

SURVEILLANCE REQUIREMENTS

4.0.1 Surveillance Requirements shall be met during the OPERATIONAL CONDITIONS or other specified conditions in the Applicability for individual Limiting Conditions for Operation, unless otherwise stated in the Surveillance Requirement. Failure to meet a Surveillance, whether such failure is experienced during the performance of the Surveillance or between performances of the Surveillance, shall be failure to meet the Limiting Condition for Operation. Failure to perform a Surveillance within the specified Surveillance time interval and allowed extension per Specification 4.0.2, shall be failure to meet the Limiting Condition for Operation except as provided in Specification 4.0.3. Surveillances do not have to be performed on inoperable equipment or variables outside specified limits.

4.0.2 Each Surveillance Requirement shall be performed within the specified surveillance time interval with a maximum allowable extension not to exceed 25% of the surveillance interval.

4.0.3 If it is discovered that a Surveillance was not performed within its specified Surveillance time interval and allowed extension per Specification 4.0.2, then compliance with the requirement to declare the Limiting Condition for Operation not met may be delayed, from the time of discovery, up to 24 hours or up to the limit of the specified Surveillance time interval, whichever is greater. This delay period is permitted to allow performance of the Surveillance. The delay period is only applicable when there is a reasonable expectation the surveillance will be met when performed. A risk evaluation shall be performed for any Surveillance delayed greater than 24 hours and the risk impact shall be managed.

If the Surveillance is not performed within the delay period, the Limiting Condition for Operation must immediately be declared not met, and the applicable ACTION requirements must be entered.

When the Surveillance is performed within the delay period and the Surveillance is not met, the Limiting Condition for Operation must immediately be declared not met, and the applicable ACTION requirements must be entered.

4.0.4 Entry into an OPERATIONAL CONDITION or other specified condition in the Applicability of a Limiting Condition for Operation shall only be made when the Limiting Condition for Operation's Surveillance Requirements have been met within their Surveillance time interval, except as provided in Specification 4.0.3. When a Limiting Condition for Operation is not met due to its Surveillance Requirements not having been met, entry into an OPERATIONAL CONDITION or other specified condition in the Applicability shall only be made in accordance with Specification 3.0.4.

This provision shall not prevent entry into OPERATIONAL CONDITIONS or other specified conditions in the Applicability that are required to comply with ACTION requirements or that are part of a shutdown of the unit.

INSERT

4.0.5 Inservice Inspection and Inservice Testing Program

~~The INSERVICE TESTING PROGRAM is the licensee program that fulfills the requirements of 10 CFR 50.55a(f). The Inservice Inspection Program is the licensee program that fulfills the requirements of 10 CFR 50.55a(g).~~

~~The provisions of SR 4.0.2 and SR 4.0.3 do not apply to the INSERVICE TESTING PROGRAM unless there is a specific SR referencing usage of the program.~~

TS 4.0.5 INSERT

Structures, systems, and components (SSCs) within the INSERVICE TESTING PROGRAM shall be tested in accordance with the requirements of 10 CFR 50.55a(f). SSCs within the Inservice Inspection Program shall be inspected in accordance with the requirements of 10 CFR 50.55a(g). The provisions of SR 4.0.2 and SR 4.0.3 do not apply to the INSERVICE TESTING PROGRAM unless there is a specific SR referencing usage of the program.

SSCs that have been categorized as Risk-Informed Safety Class (RISC) of RISC-3 in accordance with 10 CFR 50.69, and removed from the INSERVICE TESTING PROGRAM or Inservice Inspection Program in accordance with 10 CFR 50.69(b)(1)(v), are subject to the alternative treatment requirements specified in 10 CFR 50.69(d)(2). The SSCs must continue to meet the acceptance criteria specified in the applicable technical specification surveillance requirements; however, the surveillance frequency is determined as part of the alternative treatment.

ATTACHMENT 3

License Amendment Request

**Limerick Generating Station, Units 1 and 2
Docket Nos. 50-352 and 50-353**

Proposed Administrative Changes to Technical Specifications

Proposed Technical Specifications Bases Markup Pages

Unit 1 TS Bases Pages

B 3/4 0-6

Unit 2 TS Bases Pages

B 3/4 0-6

3/4.0 APPLICABILITY

BASES

SR(s) are not required to be performed, per Specification 4.0.1, which states that surveillances do not have to be performed on inoperable equipment. When equipment is inoperable, Specification 4.0.4 does not apply to the associated SR(s) since the requirement for the SR(s) to be performed is removed. Therefore, failing to perform the Surveillance(s) within the specified Surveillance time interval does not result in a Specification 4.0.4 restriction to changing OPERATIONAL CONDITIONS or other specified conditions of the Applicability. However, since the Limiting Condition for Operation is not met in this instance, Specification 3.0.4 will govern any restrictions that may (or may not) apply to OPERATIONAL CONDITION or other specified condition changes. Specification 4.0.4 does not restrict changing OPERATIONAL CONDITIONS or other specified conditions of the Applicability when a Surveillance has not been performed within the specified Surveillance time interval, provided the requirement to declare the Limiting Condition for Operation not met has been delayed in accordance with Specification 4.0.3.

The provisions of Specification 4.0.4 shall not prevent entry into OPERATIONAL CONDITIONS or other specified conditions in the Applicability that are required to comply with ACTION requirements. In addition, the provisions of Specification 4.0.4 shall not prevent changes in OPERATIONAL CONDITIONS or other specified conditions in the Applicability that result from any unit shutdown. In this context, a unit shutdown is defined as a change in OPERATIONAL CONDITION or other specified condition in the Applicability associated with transitioning from OPERATIONAL CONDITION 1 to OPERATIONAL CONDITION 2, OPERATIONAL CONDITION 2 to OPERATIONAL CONDITION 3, and OPERATIONAL CONDITION 3 to OPERATIONAL CONDITION 4.

Specification 4.0.5 establishes the requirement that inservice inspection of ASME Code Class 1, 2 and 3 components and inservice testing of ASME Code Class 1, 2 and 3 pumps and valves shall be performed in accordance with a periodically updated version of Section XI of the ASME Boiler and Pressure Vessel Code and Addenda, and the ASME Code for Operation and Maintenance of Nuclear Power Plants (ASME OM Code) and applicable Addenda as required by 10 CFR 50.55a. The provisions of SR 4.0.2 and SR 4.0.3 do not apply to the INSERVICE TESTING PROGRAM unless there is a specific SR referencing usage of the program.

← **INSERT**

APPLICABILITY

BASES

condition change. When a system, subsystem, division, component, device, or variable is inoperable or outside its specified limits, the associated SR(s) are not required to be performed, per Specification 4.0.1, which states that surveillances do not have to be performed on inoperable equipment. When equipment is inoperable, Specification 4.0.4 does not apply to the associated SR(s) since the requirement for the SR(s) to be performed is removed. Therefore, failing to perform the Surveillance(s) within the specified Surveillance time interval does not result in a Specification 4.0.4 restriction to changing OPERATIONAL CONDITIONS or other specified conditions of the Applicability. However, since the Limiting Condition for Operation is not met in this instance, Specification 3.0.4 will govern any restrictions that may (or may not) apply to OPERATIONAL CONDITION or other specified condition changes. Specification 4.0.4 does not restrict changing OPERATIONAL CONDITIONS or other specified conditions of the Applicability when a Surveillance has not been performed within the specified Surveillance time interval, provided the requirement to declare the Limiting Condition for Operation not met has been delayed in accordance with Specification 4.0.3.

The provisions of Specification 4.0.4 shall not prevent entry into OPERATIONAL CONDITIONS or other specified conditions in the Applicability that are required to comply with ACTION requirements. In addition, the provisions of Specification 4.0.4 shall not prevent changes in OPERATIONAL CONDITIONS or other specified conditions in the Applicability that result from any unit shutdown. In this context, a unit shutdown is defined as a change in OPERATIONAL CONDITION or other specified condition in the Applicability associated with transitioning from OPERATIONAL CONDITION 1 to OPERATIONAL CONDITION 2, OPERATIONAL CONDITION 2 to OPERATIONAL CONDITION 3, and OPERATIONAL CONDITION 3 to OPERATIONAL CONDITION 4.

Specification 4.0.5 establishes the requirement that inservice inspection of ASME Code Class 1, 2 and 3 components and inservice testing of ASME Code Class 1, 2 and 3 pumps and valves shall be performed in accordance with a periodically updated version of Section XI of the ASME Boiler and Pressure Vessel Code and Addenda, and the ASME Code for Operation and Maintenance of Nuclear Power Plants (ASME OM Code) and applicable Addenda as required by 10 CFR 50.55a. The provisions of SR 4.0.2 and SR 4.0.3 do not apply to the INSERVICE TESTING PROGRAM unless there is a specific SR referencing usage of the program.



INSERT

TS 4.0.5 BASES INSERT

Limerick Generating Station has received a license amendment to implement 10 CFR 50.69, "Risk-Informed Categorization and Treatment of Structures, Systems and Components for Nuclear Power Reactors," and may voluntarily comply with the requirements of 10 CFR 50.69 as an alternative to compliance with the following requirements for structures, systems, and components (SSCs) that have a Risk-Informed Safety Class (RISC) of RISC-3:

- (1) The INSERVICE TESTING PROGRAM requirements of 10 CFR 50.55a(f), and
- (2) The inservice inspection, and repair and replacement (with the exception of fracture toughness), requirements for ASME Class 2 and Class 3 SSCs in 10 CFR 50.55a(g).

Therefore, SSCs that have been categorized as RISC-3 in accordance with 10 CFR 50.69 may be removed from the INSERVICE TESTING [IST] PROGRAM and the Inservice Inspection (ISI) Program in accordance with 10 CFR 50.69(b)(1)(v).

RISC-3 SSCs with technical specification surveillance requirements referencing Technical Specification 4.0.5, which have been removed from the IST/ISI programs, are subject to the alternative treatment requirements of 10 CFR 50.69(d)(2). The SSCs must continue to meet the acceptance criteria specified in associated technical specification surveillance requirements, as applicable; however, the surveillance frequency is determined as part of the alternative treatment.