



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**

REGION I
2100 RENAISSANCE BOULEVARD, SUITE 100
KING OF PRUSSIA, PENNSYLVANIA 19406-2713

January 22, 2020

Mr. Bryan C. Hanson
Senior Vice President, Exelon Generation Company, LLC
President and Chief Nuclear Officer, Exelon Nuclear
Exelon Generation Company, LLC.
4300 Winfield Rd.
Warrenville, IL 60555

SUBJECT: LIMERICK GENERATING STATION, UNITS 1 AND 2 – SECURITY BASELINE
INSPECTION REPORT 05000352/2020402 AND 05000353/2020402

Dear Mr. Hanson:

On January 8, 2020, the U.S. Nuclear Regulatory Commission (NRC) completed an inspection at Limerick Generating Station, Units 1 and 2 and discussed the results of this inspection with Mr. Frank Stuniolo, Site Vice-President, and other members of your staff. The results of this inspection are documented in the enclosed report.

No findings or violations of more than minor significance were identified during this inspection.

This letter, its enclosure, and your response (if any) will be made available for public inspection and copying at <http://www.nrc.gov/reading-rm/adams.html> and at the NRC Public Document Room in accordance with Title 10 of the *Code of Federal Regulations* 2.390, "Public Inspections, Exemptions, Requests for Withholding."

Sincerely,

/RA/

Fred L. Bower, III, Chief
Plant Support Branch
Division of Reactor Safety

Docket Nos. 05000352 and 05000353
License Nos. NPF-39 and NPF-85

Enclosure:
As stated

cc w/ encl: Distribution via LISTSERV®
S. Desimone, Manager, Site Security
D. Allard, Director, PA DEP

SUBJECT: LIMERICK GENERATING STATION, UNITS 1 AND 2 – SECURITY BASELINE
INSPECTION REPORT 05000352/2020402 AND 05000353/2020402 DATED
JANUARY 22, 2020

DISTRIBUTION:

DLew, RA (R1ORAMAIL Resource)
RLorson, DRA (R1ORAMAIL Resource)
DCollins, DRP (R1DRPMAIL Resource)
BWellington, DRP (R1DRPMAIL Resource)
JYerokun, DRS (R1DRSMAIL Resource)
PKrohn, DRS (R1DRSMAIL Resource)
JGreives, DRP
LCasey, DRP
SRutenkroger, DRP, SRI
SHaney, DRP, RI
NEsch, DRP, AA
OLopez-Santiago, RI OEDO
RidsNrrPMLimerick Resource
RidsNrrDorlLpl1 Resource
ROPreports Resource
DHuyck, NSIR
DarylJohnson, NSIR
NSimonian, NSIR
EWharton, NSIR
BDesai, DRS, RII
SOrth, DRS, RIII
RKellar, DRS, RIV

DOCUMENT NAME: G:\DRS\Plant Support Branch 1\Security\2020 IR Final\Limerick\LIM IR
2020402.docx

ADAMS ACCESSION NUMBER: ML20023A340

<input checked="" type="checkbox"/> SUNSI Review		<input checked="" type="checkbox"/> Non-Sensitive <input type="checkbox"/> Sensitive		<input checked="" type="checkbox"/> Publicly Available <input type="checkbox"/> Non-Publicly Available	
OFFICE	RI/DRS	RI/DRS	RI/DRP	RI/DRS	
NAME	DCaron	JCherubini	JGreives	FBower	
DATE	1/21/20	1/21/20	1/22/20	1/22/20	

OFFICIAL RECORD COPY

U.S. NUCLEAR REGULATORY COMMISSION
Inspection Report

Docket Numbers: 05000352 and 05000353

License Numbers: NPF-39 and NPF-85

Report Numbers: 05000352/2020402 and 05000353/2020402

Enterprise Identifier: I-2020-402-0002

Licensee: Exelon Generation Company, LLC.

Facility: Limerick Generating Station, Units 1 and 2

Location: Sanatoga, PA 19464

Inspection Dates: January 6, 2020 to January 8, 2020

Inspectors: D. Caron, Senior Physical Security Inspector
J. Cherubini, Senior Physical Security Inspector

Approved By: Fred L. Bower, III, Chief
Plant Support Branch
Division of Reactor Safety

Enclosure

SUMMARY

The U.S. Nuclear Regulatory Commission (NRC) continued monitoring the licensee's performance by conducting a security baseline inspection at Limerick Generating Station, Units 1 and 2, in accordance with the Reactor Oversight Process. The Reactor Oversight Process is the NRC's program for overseeing the safe operation of commercial nuclear power reactors. Refer to <https://www.nrc.gov/reactors/operating/oversight.html> for more information.

List of Findings and Violations

No findings or violations of more than minor significance were identified.

Additional Tracking Items

None.

INSPECTION SCOPES

Unless otherwise noted, baseline security inspections were conducted in accordance with the appropriate portions of the inspection procedures (IPs) in effect at the beginning of the inspection. Samples were declared complete when the IP requirements most appropriate to the inspection activity were met consistent with Inspection Manual Chapter 2201, "Security Inspection Program for Commercial Nuclear Power Reactors." The inspectors reviewed selected procedures and records, observed activities, and interviewed personnel to assess licensee performance and compliance with Commission rules and regulations, license conditions, site procedures, and standards. Publicly available IPs are located at: <http://www.nrc.gov/reading-rm/doc-collections/insp-manual/inspection-procedure/index.html>.

SAFEGUARDS

71130.01 - Access Authorization

The inspectors evaluated the access authorization program. The following elements were evaluated:

Access Authorization (1 Sample)

- (1)
 - Tier I: All Requirements
 - Tier II: 6 Requirements (02.06 a – c, 02.07 a – b, 02.08 b)
 - Tier III: 4 Requirements (02.10 a – c, 02.11 a)

71130.08 - Fitness For Duty Program

The inspectors evaluated the fitness for duty program by completing the following inspection elements and conducting an interview with Exelon's newest medical review officer/substance abuse expert, Dr. Linda Bissonnette, that may provide medical services to any Exelon site in Region I:

Fitness For Duty Program (1 Sample)

- (1)
 - Tier I: All Requirements
 - Tier II: 26 Requirements (02.05 a - I, 02.06 a - g, 02.07, 02.08, 02.09 a - e)
 - Tier III: 6 Requirements (02.10, 02.13 d and e, 02.14 a – c)

INSPECTION RESULTS

No findings were identified.

EXIT MEETINGS AND DEBRIEFS

The inspectors verified no proprietary information was retained or documented in this report.

- On January 8, 2020, the inspectors presented the security baseline inspection results to Mr. Frank Stuniolo, Site Vice-President, and other members of the licensee staff.

DOCUMENTS REVIEWED

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
71130.01	Miscellaneous	UAA-2019-03	INPO Access Authorization Program	02/28/2019
	Procedures	SY-AA-103-500	Access Authorization Program	Revision 15
		SY-AA-103-507	Review Criteria for Determining Trustworthiness and Reliability	Revision 6
		SY-AA-103-514	Site Authorization for Unescorted Access	Revision 19
		SY-AA-105-511	Access Authorization In-Processing/Out Processing of Personnel	Revision 25
71130.08	Corrective Action Documents	04167292		
		04216340		
		04247176		
		04202720		
		04107501		
		04107363		
		04274703		
		04215043		
		04167955		
		04302783		
		04277429		
		04284399		
	Procedures	SY-AA-102	Exelon Generation Fitness for Duty Program	Revision 21
		SY-AA-102-201	Call-Outs for Unscheduled Work	Revision 13
		SY-AA-102-203	Treatment Plan and Follow-Up Testing	Revision 7
		SY-AA-102-204	Random Selection and Notification Process	Revision 13
		SY-AA-102-205	Fitness for Duty Appeal Review	Revision 9
		SY-AA-102-206	Reporting Use of Medication	Revision 19
		SY-AA-102202	Testing for Cause	Revision 20