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Subject: Limerick Units 1 and 2 - ACCEPTANCE REVIEW: TS Change for testing of the SRVs to retain the frequency and associated Relief Requests in the IST Program (EPIDs: L-2020-LLA-0052 and L=2020=LLA=0043)
Date: Friday, March 27, 2020 1:43:40 PM

By letter dated February 6, 2020 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML20036E488) Exelon Generation Company, LLC, submitted a license amendment request pursuant to Part 50 of Title 10 of the Code of Federal Regulations (10 CFR 50.90) and two relief requests in accordance with 10 CFR 50.55a, "Codes and standards," paragraph (z)(1), for the Limerick Generating Station, Units 1 and 2 (NPF-39 and NPF-85, respectively). The proposed changes would modify the technical specification (TS) surveillance requirements (SRs) for testing of the Safety Relief Valves (SRVs) to retain the frequency and certain testing requirements only in the Inservice Testing (IST) Program. These changes will remove duplication of requirements contained in both the Limerick TS and the IST Program and relocate to the TS Bases other requirements not required to be contained in the TS. Additionally, the licensee requests approval of the two relief requests associated with IST Program requirements for the Main Steam SRVs.

The acceptance review was performed to determine if there is sufficient technical information in scope and depth to allow the NRC staff to complete its detailed technical review. The acceptance review is also intended to identify whether the application has any readily apparent information insufficiencies in its characterization of the regulatory requirements or the licensing basis of the plant.

The NRC staff has reviewed your combined license amendment and relief request application and concluded that it does provide technical information in sufficient detail to enable the NRC staff to complete its detailed technical review and make an assessment regarding the acceptability of the proposed amendment and the relief requests in terms of regulatory requirements and the protection of public health and safety and the environment. Given the lesser scope and depth of the acceptance review as compared to the detailed technical review, there may be instances in which issues that impact the NRC staff's ability to complete the detailed technical review are identified despite completion of an adequate acceptance review. If additional information is needed, you will be advised by separate correspondence.

The NRC will manage these requests as two separate, parallel reviews. Based on the information provided in your submittal, the NRC staff has estimated that review of these requests will take approximately 390 hours for the license amendment (EPID-L-2020-LLA-0052) and 310 hours for the relief requests (EPID-L-2020-LLA-0043) to complete. The NRC staff expects to complete these reviews in approximately 12 months from acceptance (March 2021). If there are emergent complexities or challenges in our review that would cause changes to the initial forecasted completion date or significant changes in the forecasted hours, the reasons for the changes, along with the new estimates, will be communicated during the routine interactions with the project manager.

These estimates are based on the NRC staff's initial review of the application and they could change, due to several factors including requests for additional information, unanticipated addition of scope to the review, and review by NRC advisory committees or hearing-related activities. Additional delay may occur if the submittal is provided to the NRC in advance or in parallel with industry program initiatives or pilot applications.

If you have any questions, please contact me at (301) 415-2597 or V.Sreenivas@nrc.gov.

Docket Nos. 50-352 and 50-353

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