



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

October 4, 2021

Mr. David P. Rhoades
Senior Vice President
Exelon Nuclear Generation Company, LLC
President and Chief Nuclear Officer
Exelon Nuclear
4300 Winfield Rd.
Warrenville, IL 60555

SUBJECT: LIMERICK GENERATING STATION, UNITS 1 AND 2—U.S. NUCLEAR
REGULATORY COMMISSION INSPECTION REPORT 05000352/2021420 AND
05000353/2021420

Dear Mr. Rhoades:

On September 3, 2021, the U.S. Nuclear Regulatory Commission (NRC) completed an inspection at Limerick Generating Station, Units 1 and 2. On September 3, 2021, the NRC Inspectors discussed the results of this inspection with Mr. Sturniolo, 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,

A handwritten signature in dark ink, appearing to read "Jeff K. Clark".

Signed by Clark, Jefferson
on 10/04/21

Jefferson K. Clark, Chief
Security Performance Evaluation Branch
Division of Security Operations
Office of Nuclear security and Incident Response

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

Enclosure:
Inspection Report

cc w/Encl.: S. DeSimone, Security Manager
samuel.desimone@exeloncorp.com

D. Rhoades

2

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DATE: October 4, 2021

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ADAMS ACCESSION NUMBER: ML21272A051 Report

OFFICE	NSIR/DSO/SPEB	NSIR/DSO/SPEB	RIII	NSIR/DSO/SPEB
NAME	P. Negrete	T. Barry	K. Hussar	J. Clark
DATE	09/28/21	09/28 /21	10/2/21	10/04/21

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**U.S. NUCLEAR REGULATORY COMMISSION (NRC)
OFFICE OF NUCLEAR SECURITY AND INCIDENT RESPONSE (NSIR)
INSPECTION REPORT**

Docket Numbers: 05000352 and 05000353

License Numbers: NPF-39 and NPF-85

Report Number: 05000352/2021420 and 05000353/2021420

Enterprise Identifier: I-2021-420-0014

Licensee: Exelon Generation Company, LLC

Facility: Limerick Generating Station, Units 1 & 2

Location: Pottstown, Pennsylvania

Inspection Dates: August 09, 2021, to September 03, 2021

Inspectors: T. Barry, Team Leader, NSIR
T. Eck, Physical Security Inspector, RI (Training)
K. Hussar, Senior Physical Security Inspector, RI
P. Negrete, Physical Security Inspector, NSIR
C. Roundtree, Senior Physical Security Inspector, NSIR

Approved By: Jefferson K. Clark, Chief
Security Performance Evaluation Branch
Division of Security Operations

Enclosure

SUMMARY

The NRC continued monitoring the licensee's performance by conducting an NRC 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>. Starting on March 20, 2020, in response to the National Emergency declared by the President of the United States on the public health risks of the coronavirus (COVID-19), inspectors were directed to begin teleworking. In addition, regional baseline inspections were evaluated to determine if all or a portion of the objectives and requirements stated in the IP could be performed remotely. If the inspections could be performed remotely, they were conducted per the applicable IP. In some cases, portions of an IP were completed remotely and on site. The inspections documented below met the objectives and requirements for completion of the IP.

OTHER ACTIVITIES – TEMPORARY INSTRUCTIONS, INFREQUENT AND ABNORMAL

92707 - Security Inspection of Facilities Impacted by a Local, State, or Federal Emergency Where the NRC's Ability to Conduct Triennial Force On-Force Exercises is Limited (1 Sample)

NRC inspectors completed this inspection by gathering sufficient information to develop a scenario that can be segmented into limited scope tactical response drills that allows for a limited assessment of the ability of licensees' physical security systems and security organization to meet the general performance objective of Title 10 of the *Code of Federal Regulations* 73.55(b) and to ensure changes made to the physical protection program in response to a local, State, or Federal emergency (e.g., state of emergency, disaster, or public health emergency) have not adversely impacted the licensee's implementation of their protective strategy.

REPORT ATTACHMENTS

Supplemental Information for the report is considered Safeguards Information and is located separately within the NRC's Safeguards Information Local Area Network and Electronic Safe database (SLES), under NS125818.

INSPECTION RESULTS

No findings were identified.

EXIT MEETINGS AND DEBRIEFS

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

- On September 3, 2021, the inspectors presented the NRC inspection results to Mr. Sturniolo and other members of the licensee staff.

DOCUMENTS REVIEWED

Inspection Procedure	Type	Designation	Description or Title	Revision or Date
92707	Corrective Action Documents Resulting from Inspection	AR 04444365		
92707	Miscellaneous	Limerick Generating Station Security Plan, Training and Qualification Plan, and Safeguards Contingency Plan and Independent Spent Fuel Storage Installation Security Program	Limerick Generating Station Security Plan, Training and Qualification Plan, and Safeguards Contingency Plan and Independent Spent Fuel Storage Installation Security Program	Revision 23
92707	Miscellaneous	Limerick Protective Strategy Brief 2021	Limerick Protective Strategy Brief 2021	2021
92707	Miscellaneous	Use of Force/Deadly Force Power Point	Use of Force/Deadly Force Power Point	2021
92707	Procedures	Security Responsibilities for Station Personnel SY-AA-101-130	Security Responsibilities for Station Personnel SY-AA-101-130	Revision 26
92707	Procedures	Station Security Defensive Strategy SY-LG-101-501	Station Security Defensive Strategy, SY-LG-101-501	Revision 006