



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

January 11, 2023

LICENSEE: Constellation Energy Generation, LLC

FACILITY: Limerick Generating Station, Units 1 and 2

SUBJECT: SUMMARY OF DECEMBER 15, 2022, MEETING WITH CONSTELLATION ENERGY GENERATION, LLC ON POTENTIAL COMPLIANCE WITH CERTAIN CLAUSES OF IEEE STANDARD 603-1991 IN LIMERICK DIGITAL INSTRUMENTATION AND CONTROLS LICENSE AMENDMENT REQUESTS (EPID L-2022-LLA-0140)

On December 15, 2022, an observation public meeting was held between the U.S. Nuclear Regulatory Commission (NRC) and representatives of Constellation Energy Generation, LLC (Constellation; licensee) via video conference. The purpose of the meeting was to discuss potential exceptions for independence and operating bypass in Clauses 5.6.1, 6.6 and 7.4 of IEEE-603-1991 as identified in staff's Limerick Generating Station, Units 1 and 2 (Limerick) digital instrumentation and controls (I&C) license amendment requests acceptance letter dated December 9, 2022 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML22339A064). The meeting notice and agenda, dated December 5, 2022, are available in the at ML22347A252. The presentation used by the Constellation representatives is available at ML22347A153. A list of attendees is provided in the enclosure. An official transcript of the meeting proceeding is available at ML23003A170.

The Limerick digital I&C license amendment requests were submitted on September 26, 2022 (ML22269A569), and supplemented on August 12, 2022 (ML22224A149). After receiving a license amendment request, the NRC staff conducted an acceptance review to determine if there is sufficient technical information in scope and depth to allow the NRC staff to complete a detailed technical review. The staff in its acceptance review decision on December 9, 2022 (ML22339A064) noted that Constellation is taking exception for independence and operating bypass in Clauses 5.6.1, 6.6 and 7.4 of IEEE-603-1991, correspond to similar requirements in IEEE Standard 279-1968, that are required to be met for proposed protection systems at Limerick in accordance with Title 10 of the *Code of Federal Regulations* 55.55a(h)(2). The staff requested Constellation to address this potential compliance issue of a high priority licensing concern in a public meeting.

The licensee discussed the potential compliance issue and informed the staff that it had provided its review comments in the Westinghouse Licensing Technical Report (LTR) to ensure Emergency Operating Procedures (EOPs) and Severe Accident Guidelines (SAGs) overrides were described appropriately but the LTR miscategorized the overrides as operating bypasses. Additionally, a typographical error in the LTR for clause 5.6.1 in IEEE Standard 603-1991, was not identified by reviewers.

The licensee clarified that the definition of an operating bypass in IEEE Standard 603-1991 specifically states that operating bypasses are used for mode changes. Furthermore, its review of the logic in the system for the emergency operating procedures and severe accident guidelines in the plant protection system indicated that these features (operating bypass) are not there to enable plant mode changes. The overrides that were described for this clause in the LTR did not fall under that category because it does not change the mode when those overrides take place. Constellation therefore concluded that overrides were miscategorized as operating bypasses and will be corrected in the next revision to LTR.

Additionally, Constellation informed the staff that there was a typographical error in the LTR that showed partial compliance for independence in the clause 5.6.1 of IEEE Standard 603-1991, instead of indicating a complete compliance. This error was self-identified.

The NRC staff asked several clarifying questions based on the licensee's slide presentation, including clarification of the proposed timeline for docketing LTR revision(s). The staff informed the licensee that a deadline for submitting LTR and any additional documents on the docket will be required and that the current deadline of 'spring of 2023' is too broad. The staff need a much more specific deadline for the LTR revision to be docketed.

The staff also clarified its understanding that the licensee intends to supplement the docket with this LTR revision prior to the NRC issuing request for additional information (RAI), in lieu of using the RAI process as part of the open item audit. The licensee confirmed the staff's understanding of the process for providing the requested information going forward.

Summary:

1. Constellation will make corrections to the appropriate licensing amendment request documents.
 - Correct the classification of operating bypasses as overrides and change exception status of clauses 6.6 and 7.4 of IEEE Standard 603-1991 to full compliance,
 - Correct typographical error for partial compliance for independence in the clause 5.6.1 of IEEE Standard 603-1991 to indicate a complete compliance.
2. Constellation will address the above issue within its corrective action program, the vendor's corrective action program, as well as vendor oversight program.

No regulatory decisions were made as a result of this teleconference. No members of the public identified themselves on the teleconference. No Public Meeting Feedback forms were received. Please direct any inquiries to me at (301) 415-6303 or bhagwat.jain@nrc.gov or to Mr. Michael Marshall at michael.marshall@nrc.gov or (301) 415-2871.

Sincerely,

/RA/

Bhagwat P. Jain, Senior Project Manager
Plant Licensing Branch IV
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-352 and 50-353

Enclosure:
List of Attendees

cc: Listserv

LIST OF ATTENDEES

DECEMBER 15, 2022, MEETING WITH CONSTELLATION ENERGY GENERATION,
LLC REGARDING POTENTIAL COMPLIANCE WITH CERTAIN CLAUSES OF IEEE
STANDARD 603-1991 IN LIMERICK DIGITAL INSTRUMENTATION AND CONTROLS
LICENSE AMENDMENT REQUESTS (EPID L-2022-LLA-0140)

Attendee	Organization
Bhagwat Jain	U.S. Nuclear Regulatory Commission (NRC)
Steve Wyman	NRC
Khoi Nguyen	NRC
Eric Benner	NRC
Samir Darbali	NRC
Ming Li	NRC
Michael Marshall	NRC
Ed Miller	NRC
Alvarado Rossnyev	NRC
Richard Stattel	NRC
Michael Waters	NRC
James Berg	Constellation Energy Generation, LLC (Constellation)
George Bonanni	Constellation
Kevin Cawley	Constellation
John Connelly	Constellation
David Helker	Constellation
Paul Krueger	Constellation
Mark DiRado	Constellation
Kayla Love, Marriner	Constellation
Steven R Hesse	Constellation
Ashley Rickey	Constellation
Mark Samselski	Constellation
Scott Schumacher	Constellation
Gerald Segner	Constellation
Warren Odess-Gillett	Westinghouse
Alan Campbell	Nuclear Energy Institute
Pareez E. Golub	Sargent & Lundy Engineers
Mark Lloyd	-----
Dominic Mocello	-----
Boyan A. Setchenski	-----

Enclosure

SUBJECT: SUMMARY OF DECEMBER 15, 2022, MEETING WITH CONSTELLATION ENERGY GENERATION, LLC ON POTENTIAL COMPLIANCE WITH CERTAIN CLAUSES OF IEEE STANDARD 603-1991 IN LIMERICK DIGITAL INSTRUMENTATION AND CONTROLS LICENSE AMENDMENT REQUESTS (EPID L-2022-LLA-0140) DATED: JANUARY 11, 2023

DISTRIBUTION:

PUBLIC	BJain, NRR
PM File Copy	EMiller, NRR
RidsACRS_MailCTR Resource	MLi, NRR
RidsNrrDex Resource	MMarshall, NRR
RidsNrrDorl Resource	RAIvarado, NRR
RidsNrrDorlLpl1 Resource	RStattel, NRR
RidsNrrLAKZeletznoek Resource	EBenner, NRR
RidsNrrPMLimerick Resource	CAntonescu, ACRS
RidsRgn1MailCenter Resource	DJohnson, OEDO
SLav, NRR	KNguyen, NRR
JRankin, NRR	MWaters, NRR

ADAMS Accession Nos.:

Package: ML23009A562

Meeting Notice: ML22311A506

Handout: ML22319A001 (Constellation)

Meeting Summary: ML23009A587

OFFICE	NRR/DORL/LPL4/PM	NRR/DORL/LPL1/LA	NRR/DEX/EICB/BC
NAME	BJain	KEntz	MWaters
DATE	1/9/2023	1/11/2023	1/9/2023
OFFICE	NRR/DORL/LPL1/BC	NRR/DORL/LPL4/PM	
NAME	HGonzález	BJain	
DATE	1/10/2023	1/11/2023	

OFFICIAL RECORD COPY