

March 14, 2008

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555-0001Limerick Generating Station, Units 1 and 2
Facility Operating License Nos. NPF-39 and NPF-85
Docket Nos. 50-352 and 50-353Subject: License Amendment Request - Revise LPRM Calibration Frequency
Supplemental Response - Global Nuclear Fuel Report - "Limerick LPRM
Calibration Interval Extension Support"Reference: 1) Letter from Pamela B. Cowan, Exelon Generation Company, LLC, to
U. S. Nuclear Regulatory Commission, "License Amendment Request -
Revise Local Power Range Monitor Calibration Frequency," dated October
19, 2007

By letter dated October 19, 2007 (Reference 1), Exelon Generation Company, LLC (Exelon) requested changes to the Technical Specifications (TS), Appendix A of Facility Operating License Nos. NPF-39 and NPF-85 for Limerick Generating Station (LGS), Units 1 and 2, respectively. The proposed changes would increase the interval between Local Power Range Monitor (LPRM) calibrations from 1000 Effective Full Power Hours (EFPH) to 2000 EFPH.

Subsequently, during a teleconference discussion with NRC and Exelon representatives on February 5, 2008, the NRC requested additional information regarding the impact of the use of reduced LPRM uncertainty values when evaluating the LPRM calibration interval extension.

Accordingly, enclosed is an LGS plant-specific evaluation prepared by Global Nuclear Fuel (GNF) that supports extending the nominal LPRM calibration interval from 1000 EFPH to 2000 EFPH. Enclosure 1 to this letter provides a copy of GNF report, "Limerick LPRM Calibration Interval Extension Support," which GNF considers to contain proprietary information. The proprietary information is identified by bracketed text. GNF requests that the proprietary information in Enclosure 1 be withheld from public disclosure, in accordance with the requirements of 10 CFR 9.17(a)(4) and 10 CFR 2.390(a)(4). Enclosure 2 to this letter provides a non-proprietary version of the subject GNF report. An original signed affidavit supporting this request is included in Enclosure 3 to this letter.

U.S. Nuclear Regulatory Commission
License Amendment Request - Revise LPRM Calibration Frequency
Docket Nos. NPF-39 and NPF-85
March 14, 2008
Page 2

Exelon has concluded that the information provided in this supplemental response does not impact the conclusions of the: 1) Technical Analysis, 2) No Significant Hazards Consideration under the standards set forth in 10 CFR 50.92(c), or 3) Environmental Consideration as provided in the Reference 1 submittal.

There are no regulatory commitments contained within this letter. If you have any further questions or require additional information, please contact Richard Gropp at 610-765-5557.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 14th day of March 2008.

Respectfully,



Pamela B. Cowan
Director – Licensing and Regulatory Affairs
Exelon Generation Company, LLC

- Enclosure 1: Global Nuclear Fuel Report - Limerick LPRM Calibration Interval Extension Support (Proprietary Version)
- Enclosure 2: Global Nuclear Fuel Report - Limerick LPRM Calibration Interval Extension Support (Non-Proprietary Version)
- Enclosure 3: Global Nuclear Fuel Report - Limerick LPRM Calibration Interval Extension Support (supporting Affidavit)

cc: Regional Administrator - NRC Region I w/ Enclosure 2 only
NRC Senior Resident Inspector - LGS “
NRC Project Manager, NRR - LGS “
Director, Bureau of Radiation Protection - Pennsylvania Department of Environmental Protection “

ENCLOSURE 2

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

**License Amendment Request
Revise LPRM Calibration Interval**

**Global Nuclear Fuel Report
Limerick LPRM Calibration Interval Extension Support**

Non-Proprietary Version