

June 5, 2008

MEMORANDUM TO: Harold K. Chernoff, Chief
Plant Licensing Branch I-2
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

FROM: Peter Bamford, Project Manager */ra/*
Plant Licensing Branch I-2
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

SUBJECT: LIMERICK GENERATING STATION, UNITS 1 AND 2 - ELECTRONIC
TRANSMISSION, DRAFT REQUEST FOR ADDITIONAL INFORMATION
REGARDING LOCAL POWER RANGE MONITOR CALIBRATION
FREQUENCY REVISION (TAC NOS. MD7048 AND MD7049)

The attached draft request for additional information (RAI) was transmitted by electronic transmission on June 3, 2008, to Mr. Richard Gropp, at Exelon Generation Company, LLC (Exelon). This draft RAI was transmitted to facilitate the technical review being conducted by the Nuclear Regulatory Commission (NRC) staff and to support a conference call (if needed) with Exelon in order to clarify the licensee's submittal. The draft RAI is related to Exelon's submittal dated October 19, 2007, regarding Limerick Generating Station, Units 1 and 2, Proposed Revision to Local Power Range Monitor Calibration Frequency. The draft questions were sent to ensure that they were understandable, the regulatory basis was clear, and to determine if the information was previously docketed. Additionally, review of the draft RAI would allow Exelon to evaluate and agree upon a schedule to respond to the RAI. This memorandum and the attachment do not represent an NRC staff position.

Docket Nos. 50-352 and 50-353

Enclosure: As stated

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DRAFT

REQUEST FOR ADDITIONAL INFORMATION
REGARDING PROPOSED CHANGES TO THE TECHNICAL SPECIFICATIONS
LOCAL POWER RANGE MONITOR CALIBRATION FREQUENCY
LIMERICK GENERATING STATION, UNIT NOS. 1 AND 2
DOCKET NOS. 50-352 AND 50-353

By letter dated October 19, 2007 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML072970339), Exelon Generation Company, LLC, submitted a license amendment request (LAR) regarding an extension of the local power range monitor (LPRM) calibration interval specified in the technical specifications for Limerick Generating Station, Units 1 and 2. The original LAR was supplemented by letters dated March 14, 2008 (ADAMS Accession No. ML080850565) and March 26, 2008 (ADAMS Accession No. ML080990667).

The Nuclear Regulatory Commission staff has been reviewing the submittal and has determined that additional information is needed to complete its review.

- 1.) In Enclosure 1 of the March 14, 2008 supplement, it is stated that 2,000 effective full power hours is equivalent to ~ (approximately) 2,000 Megawatt Days per short ton (MWD/st). Provide a demonstration that 2,000 effective full power hours is conservative or equivalent to 2,000 MWD/st or provide a proposed surveillance interval that is bounding with respect to the analysis.
- 2.) In the March 14, 2008, supplement, it is stated that, "Reference 9 also shows [emphasis added] that this has an [[]] on the calculated SLMCPR [Safety Limit Minimum Critical Power Ratio] value." Reference 9 was provided by the March 26, 2008, update letter, in which it is stated, "For the Limerick plants, comparison between SLMCPR calculations using the original LPRM update uncertainty and the doubled LPRM update uncertainty shows an [[]] on the calculated SLMCPR." This is a statement or conclusion. Provide a demonstration or calculations with an explanation that shows this conclusion is valid.
- 3.) In the March 26, 2008 supplement, a demonstration was provided regarding doubling of the LPRM uncertainty on the SLMCPR. Is it your intent to apply this doubling to your SLMCPR calculations and reflect this methodology change in your licensing basis when operating with the longer surveillance interval? If so how will the SLMCPR calculations and the licensing basis documentation be updated?