



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

February 17, 2012

Mr. Michael P. Gallagher
Vice President License Renewal Projects
Exelon Generation Company, LLC
200 Exelon Way
Kennett Square, PA 19348

SUBJECT: REQUESTS FOR ADDITIONAL INFORMATION FOR THE REVIEW OF THE
LIMERICK GENERATING STATION, UNITS 1 AND 2, LICENSE RENEWAL
APPLICATION (TAC NOS. ME6555 AND ME6556)

Dear Mr. Gallagher:

By letter dated June 22, 2011, Exelon Generation Company, LLC submitted an application pursuant to Title 10 of the *Code of Federal Regulations* Part 54 (10 CFR Part 54), to renew the operating licenses for Limerick Generating Station, Units 1 and 2, for review by the U.S. Nuclear Regulatory Commission (NRC or the staff). The staff is reviewing the information contained in the license renewal application and has identified, in the enclosure, areas where additional information is needed to complete the review.

These requests for additional information were discussed with Christopher Wilson, and a mutually agreeable date for the response is within 30 days from the date of this letter. If you have any questions, please contact me at 301-415-3733 or by e-mail Robert.Kuntz@nrc.gov.

Sincerely,

A handwritten signature in black ink, appearing to be "R. Kuntz", written over a large, stylized flourish.

Robert F. Kuntz, Senior Project Manager
Projects Branch 1
Division of License Renewal
Office of Nuclear Reactor Regulation

Docket Nos. 50-352 and 50-353

Enclosure:
Requests for Additional Information

cc w/encl: Listserv

**LIMERICK GENERATING STATION
LICENSE RENEWAL APPLICATION
REQUESTS FOR ADDITIONAL INFORMATION**

RAI 2.3.3.4-1

As described in license renewal application (LRA) Sections 2.3.3.4, 2.3.3.7, 2.3.3.16, 2.3.3.20, and 2.3.3.23, the LRA listed generalized “ducting and components type” category excluding its specific HVAC system component types with their respective housings such as fans and fan housings, dampers and damper housings, fire dampers and fire damper housings, filters and filter housings, heating and cooling coils, etc., as applicable, in LRA tables.

Therefore, clarify whether these component types and all other applicable component types of the system are within the scope of license renewal in accordance with Title 10 of the Code of Federal Regulations (10 CFR) 54.4(a), and subject to aging management review in accordance with 10 CFR 54.21(a)(1). If these component types are in the scope of license renewal, update the LRA by providing the applicable information in the appropriate LRA tables. If these component types are excluded from the scope of license renewal and not subject to an aging management review (AMR), provide justification for the exclusion.

RAI 2.3.3.4-2

Limerick Generating Station (LGS) control enclosure ventilation system described in LRA Section 2.3.3.4 and on LRA Drawing LR-78, Sheet 1 through 4, LR-M-90, Sheets 1 and 2, and LRA Table 2.3.3-4, “Control Enclosure Ventilation System - Components Subject to Aging Management Review.” However, LRA Table 2.3.3-23 does not contain all the component types of the control enclosure ventilation system highlighted on the drawing. For example, while the table lists component types for bolting, ducting and components, and flexible connections, it does not list any specific components and their housing types associated with “ducting and components type” such as fans and fan housings, dampers and damper housings, fire dampers and fire damper housings, filters and filter housings, heating and cooling coils etc., as applicable.

Also, LRA Table 3.3.2-4, “Control Enclosure Ventilation System – Component Subject to Aging Management Review,” does not list any specific components and their housing types associated with “ducting and components type” such as fans and fan housings, dampers and damper housings, fire dampers and fire damper housings, filters and filter housings, heating and cooling coils etc., as applicable.

Clarify whether these component types and all other applicable component types of the system are within the scope of license renewal in accordance with 10 CFR 54.4(a), and subject to AMR in accordance with 10 CFR 54.21(a)(1). If these component types are in the scope of license renewal, update the LRA by providing the applicable information in the appropriate LRA tables. If these component types are excluded from the scope of license renewal and not subject to an AMR, provide justification for the exclusion.

RAI 2.3.2.5-1

Drawings LR-M-51 Sheet 3 at zone/location G-6 and LR-M-51 Sheet 5 at zone/location G-3 show test connection valves 1175B and 2175A and inlet piping and tail pipe and pipe cap highlighted in red as being nonsafety-related in-scope for structural support and/or spatial interaction with safety-related SSCs. Drawings LR-M-51 Sheet 1 at zone/location G-3 and LR-M-51 Sheet 7 at zone/location G-6 show test connection valves 1175A and 2175B highlighted in green as being in scope due to supporting a safety-related or license renewal regulated event function. The tail pipe and pipe caps associated with 1175A and 2175B are highlighted in red. Please clarify the basis for inclusion of these test connection valves and inlet/outlet piping including any physical differences between LGS, Unit 1 and Unit 2 that resulted in different scoping criteria being applied.

RAI 2.3.3.7-1

LGS emergency diesel generator enclosure ventilation system is described in LRA Section 2.3.3.7 and on LRA Drawing LR-M-81, Sheets 1 and 3, and LR-M-20, Sheet 8 and 14, and LRA Table 2.3.3-7, "Emergency Diesel Generator Enclosure Ventilation System - Components Subject to Aging Management Review." However, LRA Table 2.3.3-7 does not contain all the component types of the emergency diesel generator enclosure ventilation system highlighted on the drawing. For example, while the table lists component types for bolting, ducting and components, and flexible connections, it does not list any specific components and their housing types associated with "ducting and components type" such as fans and fan housing, dampers and damper housings, fire dampers and fire damper housings, filters and filter housings, heating and cooling coils etc., as applicable.

Also, LRA Table 3.3.2-7, "Emergency Diesel Generator Enclosure Ventilation System – Component Subject to Aging Management Review," does not list any specific components and their housing types associated with "ducting and components type" such as fans and fan housings, dampers and damper housings, fire dampers and fire damper housings, filters and filter housings, heating and cooling coils etc., as applicable.

Clarify whether these component types and all other applicable component types of the system are within the scope of license renewal in accordance with 10 CFR 54.4(a), and subject to aging management review in accordance with 10 CFR 54.21(a)(1). If these component types are in the scope of license renewal, update the LRA by providing the applicable information in the appropriate LRA tables. If these component types are excluded from the scope of license renewal and not subject to an AMR, provide justification for the exclusion.

RAI 2.3.3.16-1

LGS primary containment ventilation system is described in LRA Section 2.3.3.16 and on LRA Drawing LR-M-77, Sheets 1 and 2, LR-M-87, Sheets 1 through 10, LR-M-23, Sheets 4 and 7, LR-M-43, Sheets 1 and 3, LR-M-60, Sheets 1 and 2, and LR-M-69, Sheets 1 through 4, and LRA Table 2.3.3-16, "Primary Containment Ventilation System - Components Subject to Aging

Management Review.” However, LRA Table 2.3.3-16 does not contain all the component types of the Primary Containment Ventilation System highlighted on the drawing. For example, while the table lists component types such as bolting, ducting and components, flexible connections, etc., it does not list any specific components and their housing types associated with “ducting and components type.”

Also, LRA Table 3.3.2-16, “Primary Containment Ventilation System – Component Subject to Aging Management Review,” does not list any specific components and their housing types associated with “ducting and components type.”

Clarify whether these component types and all other applicable component types of the system are within the scope of license renewal in accordance with 10 CFR 54.4(a), and subject to AMR in accordance with 10 CFR 54.21(a)(1). If these component types are in the scope of license renewal, update the LRA by providing the applicable information in the appropriate LRA tables. If these component types are excluded from the scope of license renewal and not subject to an AMR, provide justification for the exclusion.

RAI 2.3.3.20-1

LGS reactor enclosure ventilation system is described in LRA Section 2.3.3.20 and on LRA Drawing LR-M-76, Sheets 1 through 10, and LRA Table 2.3.3-20, “Reactor Enclosure Ventilation System - Components Subject to Aging Management Review.” However, LRA Table 2.3.3-20 does not contain all the component types of the Reactor Enclosure Ventilation System highlighted on the drawing. For example, while the table lists component types such as bolting, ducting and components, flexible connections, etc., it does not list any specific components and their housing types associated with “ducting and components type.”

Also, LRA Table 3.3.2-20, “Reactor Enclosure Ventilation System – Component Subject to Aging Management Review,” does not list any specific components and their housing types associated with “ducting and components type.”

Clarify whether these component types and all other applicable component types of the system are within the scope of license renewal in accordance with 10 CFR 54.4(a), and subject to aging management review in accordance with 10 CFR 54.21(a)(1). If these component types are in the scope of license renewal, update the LRA by providing the applicable information in the appropriate LRA tables. If these component types are excluded from the scope of license renewal and not subject to an AMR, provide justification for the exclusion.

RAI 2.3.3.23-1

LGS spray pond pump house ventilation system is described in LRA Section 2.3.3.23 and on LRA Drawing LR-81, Sheet 1, and LRA Table 2.3.3-23, “Spray Pond Pump House Ventilation System - Components Subject to Aging Management Review.” However, LRA Table 2.3.3-23 does not contain all the component types of the Spray Pond Pump House Ventilation System highlighted on the drawing. For example, while the table lists component types for bolting, ducting and components, and flexible connections, it does not list any specific components and

their housing types associated with “ducting and components type” such as fans and fan housings, dampers and damper housings, fire dampers and fire damper housings, filters and filter housings, heating and cooling coils etc., as applicable. Also, LRA Table 3.3.2-23, “Spray Pond Pump House Ventilation System – Component Subject to Aging Management Review” does not list any specific components and their housing types associated with “ducting and components type” such as fans and fan housings, dampers and damper housings, fire dampers and fire damper housings, filters and filter housings, heating and cooling coils etc., as applicable.

Clarify whether these component types and all other applicable component types of the system are within the scope of license renewal in accordance with 10 CFR 54.4(a), and subject to aging management review in accordance with 10 CFR 54.21(a)(1). If these component types are in the scope of license renewal, update the LRA by providing the applicable information in the appropriate LRA tables. If these component types are excluded from the scope of license renewal and not subject to an AMR, provide justification for the exclusion.

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Sincerely,

/RA/

Robert F. Kuntz, Senior Project Manager
Projects Branch 1
Division of License Renewal
Office of Nuclear Reactor Regulation

Docket Nos. 50-352 and 50-353

Enclosure:
Requests for Additional Information

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SUBJECT: REQUESTS FOR ADDITIONAL INFORMATION FOR THE REVIEW OF THE
LIMERICK GENERATING STATION, LICENSE RENEWAL APPLICATION

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