

10 CFR 50.71(e)
10 CFR 54.37(b)

September 19, 2018

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555-0001

Limerick Generating Station, Units 1 and 2
Renewed Facility Operating License Nos. NPF-39 and NPF-85
NRC Docket Nos. 50-352 and 50-353

Subject: Submittal of Updated Final Safety Analysis Report (UFSAR), Revision 19
and UFSAR Reference Drawings

In accordance with 10 CFR 50.71(e)(4) and 10 CFR 50.4(b)(6), enclosed is Revision 19 of the Updated Final Safety Analysis Report (UFSAR) for Limerick Generating Station (LGS), Units 1 and 2. The enclosed UFSAR Revision 19 is being provided to the NRC in electronic format on compact disk (CD-ROM). This electronic version of the UFSAR is being submitted in its entirety and constitutes a total replacement copy. In addition, as required by 10 CFR 50.71(e)(2)(ii), Attachment 1 to this letter identifies changes made under the provisions of 10 CFR 50.59, and included in Revision 19 of the UFSAR, but not previously submitted to the NRC.

10 CFR 50.71(e)(4) stipulates that revisions to the UFSAR must reflect changes made up to a maximum of six months prior to the submittal. As a result, UFSAR Revision 19 reflects changes made to the LGS, Units 1 and 2, UFSAR at least up to June 30, 2018.

Also enclosed is a CD-ROM containing copies of drawings currently referenced but not included in the LGS, Units 1 and 2, UFSAR. These drawings were current at least up to August 31, 2018.

The following enclosures contain the CD-ROMs with the updated files for the UFSAR and Reference Drawings in PDF format.

- Enclosure 1 – LGS, Units 1 and 2, UFSAR Revision 19 updated files
- Enclosure 2 – LGS, Units 1 and 2, UFSAR Reference Drawing files

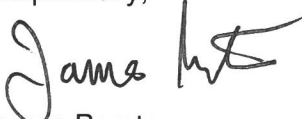
Attachment 2 includes file directory structure information identifying directory path, filename, and size of the individual files on the enclosed CDs.

On October 20, 2014, the NRC issued Renewed Facility Operating Licenses NPF-39 and NPF-85 for LGS, Units 1 and 2, respectively. Therefore, pursuant to the requirements of 10 CFR 54.37(b) and the guidance specified in Regulatory Issue Summary 2007-16, Revision 1, "*Implementation of the Requirements of 10 CFR 54.37(b) for Holders of Renewed Licenses*," the UFSAR update required by 10 CFR 50.71(e) must include any Structures, Systems, or Components (SSCs) newly identified that would have been subject to an aging management review or evaluation of time-limited aging analyses in accordance with 10 CFR 54.21. The UFSAR update must describe how the licensee will manage the effects of aging in order to effectively maintain the intended function(s) of newly-identified SSCs. An evaluation was completed to determine whether any newly-identified SSCs existed in support of submitting UFSAR Revision 19 for LGS, Units 1 and 2. This evaluation involved reviewing pertinent documentation for the period subsequent to the last LGS biennial UFSAR revision. As a result of this review, there were no newly-identified SSCs for which aging management reviews or time-limited aging analyses would apply.

As required by 10 CFR 50.71(e)(2)(i), I certify that to the best of my knowledge, the information contained in the Enclosures and Attachments to this letter accurately reflects information and analyses submitted to the NRC, or prepared pursuant to NRC requirements as described above.

If you have any questions or require further information, please contact Richard Gropp at (610) 765-5557.

Respectfully,



James Barstow
Director, Licensing and Regulatory Affairs
Exelon Generation Company, LLC

Enclosures: Enclosure 1 - CD-ROM – LGS, Units 1 and 2, UFSAR Revision 19
Enclosure 2 - CD-ROM – LGS, Units 1 and 2, UFSAR Reference Drawings

Attachments: Attachment 1 - Summary of UFSAR Changes
Attachment 2 - Electronic File Directory Structure

cc: w/ Enclosures and Attachments

NRC Regional Administrator - NRC Region I
NRC Senior Resident Inspector - LGS
NRC Project Manager, NRR - LGS
Director, Bureau of Radiation Protection - Pennsylvania
Department of Environmental Protection
R. R. Janati, Commonwealth of Pennsylvania

ATTACHMENT 1

Summary of UFSAR Changes

10 CFR 50.71(e)(2)(ii) requires that revisions to the UFSAR include changes made under the provisions of 10 CFR 50.59, but not previously submitted to the NRC. Accordingly, the list below identifies plant changes included in Revision 19 of the Updated Final Safety Analysis Report (UFSAR) that were not previously submitted to the NRC.

Limerick Generating Station, Units 1 and 2
Summary of UFSAR Changes – Revision 19

UFSAR Change Request	Issue Report	Engineering Change Request / Engineering Change	Description
2015-010	1608793-40	ECR 14-00149	Revised UFSAR (Chapters 3 and 7) to reflect changes associated with Plant Process Computer (PPC) replacement project (Unit 1).
2015-026	1608793-60	ECR 15-00017	Revised UFSAR (Chapter 15) to reflect changes to Main Steam Isolation Valve (MSIV) low pressure isolation setpoint change.
2016-009	1608793-81	ECR 16-00139	Revised UFSAR (Chapter 9A) to include new figure showing time-current coordination curve for new breaker.
2016-016	2711044-01	ECR 16-00183	Revised UFSAR (Chapter 9A) to reflect changes to the Fire Protection Report for combustible loading.
2016-017	2711044-03	ECR 15-00254	Revised UFSAR (Chapter 9) to address Unit 1 Spent Fuel Pool (SFP) cooling vulnerability resolution.
2016-018	2711044-07	ECR 16-00013	Revised UFSAR (Chapter 9A) to reflect changes to the Fire Protection Report for combustible loading.
2016-019	2711044-08	N/A	Revised UFSAR (Chapter 6) to address editorial/administrative changes related to Peak Cladding Temperature (PCT) information.
2016-020	3944720-02	N/A	Revised UFSAR (Chapter 13) to remove reference to regulatory guide related to Plant Access Training (PAT) and Radiation Worker Training (RWT).
2017-001	2711044-11	EC 423429	Revised UFSAR (Chapter 9) to address Unit 2 Spent Fuel Pool (SFP) cooling vulnerability resolution.
2017-002	2711044-12	EC 423281	Revised UFSAR (Chapter 6) to reflect changes associated with incorporation of Unit 2 containment hardened vent.
2017-003	2711044-13	EC 423048	Revised UFSAR (Chapters 1, 6, and 7) to reflect changes associated with replacement of the Suppression Pool and Drywell hydrogen and oxygen analyzers.
2017-004	2711044-16	EC 423270	Revised UFSAR (Chapter 9) to reflect changes associated with the revised analysis of post-accident Spray Pond performance.
2017-005	2711044-17	N/A	Revised UFSAR (Chapter 8) regarding reference to 24-month frequency for battery service testing.
2017-006	2711044-18	EC 617312	Revised UFSAR (Chapters 3 and 10) related to Unit 2 Siemens damped blade modification.
2017-007	2711044-19	N/A	Revised UFSAR (Chapters 1 and 15) related to use of Regulatory Guide 1.183 and release fractions for partial length rods.

UFSAR Change Request	Issue Report	Engineering Change Request / Engineering Change	Description
2017-008	2711044-20	N/A	Revised UFSAR (Chapter 9A) to indicate that smoke detector and supervisory circuit functional testing is performed in accordance with Technical Requirements Manual (TRM).
2017-009	2711044-26	EC 619561	Revised UFSAR (Chapter 5) to reflect materials and weld techniques used to modify the Unit 2 Reactor Pressure Vessel (RPV) nozzle N16D.
2017-010	2711044-27	EC 618196	Revised UFSAR (Chapter 10) related to Unit 1 Siemens damped blade modification.
2017-011	2711044-30	ECR 14-00149 / ECR 13-00309	Revised UFSAR (Chapter 7) related to Plant Process Computer (PPC) and Safety Parameter Display System (SPDS) description.
2017-012	2711044-31	EC 618876	Revised UFSAR (Chapters 2, 9 and 9A) regarding CO ₂ fire suppression system.
2017-013	2711044-32	ECR 15-00399 / EC 423302	Revised UFSAR (Chapters 1 and 3) related to upgrades in the seismic monitoring system.
2017-014	2711044-33	EC 423459	Revised UFSAR (Chapters 1 and 10) for the Unit 1 turbine-generator description to include the new digital Automatic Voltage Regulator (AVR).
2017-015	2711044-35	N/A	Revised UFSAR (Chapter 13) to reflect updates in the onsite organizational structure.
2017-016	4041794-02	N/A	Revised UFSAR (Chapter 9A) to correct an editorial/administrative discrepancy.
2017-020	2711044-41	N/A	Revised UFSAR (Chapter 2) related to Meteorological Tower 2 compliance with Regulatory Guide 1.23 due to the construction of two transmission poles.
2017-021	2711044-42	EC 618105	Revised UFSAR (Chapter 8) related to Open Phase Detection (OPD) modification.
2017-023	2711044-45	EC 620180	Revised UFSAR (Chapter 15) to remove reference to GE12 fuel from both the Fuel Handling Accident (FHA) and Control Rod Drop Accident (CRDA) analysis descriptions.
2017-024	2711044-47	N/A	Revised UFSAR (Chapters 6 and 15) to update references related to various report revisions associated with Global Nuclear Fuels (GNF).
2018-001	2711044-53	EC 619085	Revised UFSAR (Chapter 9A) to incorporate new fire brigade room.
2018-002	2711044-55	EC 423382	Revised UFSAR (Chapter 9A) to reflect changes in combustible loading materials.
2018-004	2711044-57	EC 619628	Revised UFSAR (Chapter 9A) to reflect changes in combustible loading materials.
2018-006	2711044-61	EC 623176	Revised UFSAR (Chapter 8) to reflect changes associated with Lock Substation 220-61 line.
2018-008	2711044-55	EC 423382	Revised UFSAR (Chapter 6) to reflect changes associated with incorporation of Unit 1 containment hardened vent.
2018-009	2711044-68	ECR 14-00022	Revised UFSAR (Chapter 7) regarding the feedwater temperature indicator in the Main Control Room (MCR) being applicable to Unit 2 only.
2018-013	2711044-75	N/A	Revised UFSAR (Chapters 6 and 15) to update references related to various report revisions associated with Global Nuclear Fuels (GNF).
2018-015	2711044-80	N/A	Revised UFSAR (Chapters 11 and 12) to reflect changes associated with the removal of references to portable continuous air monitors that monitor iodine.

ATTACHMENT 2

Electronic File Directory Structure

UFSAR Files
Reference Drawing Files

Directory Path	File Name	File Size (bytes)
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Directory Path	File Name	File Size (bytes)
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c:\LGS UFSAR R19 REF DWGS	M-0384, Sheet 0001, Rev 004, PIPING ASSEMBLY FOR SPRAY NETWORK A B C & D,0001.pdf	538,653
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