



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**

REGION I
2100 RENAISSANCE BOULEVARD, SUITE 100
KING OF PRUSSIA, PENNSYLVANIA 19406-2713

January 22, 2020

Mr. Bryan C. Hanson
Senior Vice President, Exelon Generation Company, LLC
President and Chief Nuclear Officer, Exelon Nuclear
Exelon Generation Company, LLC.
4300 Winfield Rd.
Warrenville, IL 60555

SUBJECT: LIMERICK GENERATING STATION, UNITS 1 AND 2 – SECURITY BASELINE
INSPECTION REPORT 05000352/2020402 AND 05000353/2020402

Dear Mr. Hanson:

On January 8, 2020, the U.S. Nuclear Regulatory Commission (NRC) completed an inspection at Limerick Generating Station, Units 1 and 2 and discussed the results of this inspection with Mr. Frank Stuniolo, Site Vice-President, and other members of your staff. The results of this inspection are documented in the enclosed report.

No findings or violations of more than minor significance were identified during this inspection.

This letter, its enclosure, and your response (if any) will be made available for public inspection and copying at <http://www.nrc.gov/reading-rm/adams.html> and at the NRC Public Document Room in accordance with Title 10 of the *Code of Federal Regulations* 2.390, "Public Inspections, Exemptions, Requests for Withholding."

Sincerely,

/RA/

Fred L. Bower, III, Chief
Plant Support Branch
Division of Reactor Safety

Docket Nos. 05000352 and 05000353
License Nos. NPF-39 and NPF-85

Enclosure:
As stated

cc w/ encl: Distribution via LISTSERV®
S. Desimone, Manager, Site Security
D. Allard, Director, PA DEP

SUBJECT: LIMERICK GENERATING STATION, UNITS 1 AND 2 – SECURITY BASELINE INSPECTION REPORT 05000352/2020402 AND 05000353/2020402 DATED JANUARY 22, 2020

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**U.S. NUCLEAR REGULATORY COMMISSION
Inspection Report**

Docket Numbers: 05000352 and 05000353

License Numbers: NPF-39 and NPF-85

Report Numbers: 05000352/2020402 and 05000353/2020402

Enterprise Identifier: I-2020-402-0002

Licensee: Exelon Generation Company, LLC.

Facility: Limerick Generating Station, Units 1 and 2

Location: Sanatoga, PA 19464

Inspection Dates: January 6, 2020 to January 8, 2020

Inspectors: D. Caron, Senior Physical Security Inspector
J. Cherubini, Senior Physical Security Inspector

Approved By: Fred L. Bower, III, Chief
Plant Support Branch
Division of Reactor Safety

Enclosure

SUMMARY

The U.S. Nuclear Regulatory Commission (NRC) continued monitoring the licensee's performance by conducting a security baseline inspection at Limerick Generating Station, Units 1 and 2, in accordance with the Reactor Oversight Process. The Reactor Oversight Process is the NRC's program for overseeing the safe operation of commercial nuclear power reactors. Refer to <https://www.nrc.gov/reactors/operating/oversight.html> for more information.

List of Findings and Violations

No findings or violations of more than minor significance were identified.

Additional Tracking Items

None.

INSPECTION SCOPES

Unless otherwise noted, baseline security inspections were conducted in accordance with the appropriate portions of the inspection procedures (IPs) in effect at the beginning of the inspection. Samples were declared complete when the IP requirements most appropriate to the inspection activity were met consistent with Inspection Manual Chapter 2201, "Security Inspection Program for Commercial Nuclear Power Reactors." The inspectors reviewed selected procedures and records, observed activities, and interviewed personnel to assess licensee performance and compliance with Commission rules and regulations, license conditions, site procedures, and standards. Publicly available IPs are located at: <http://www.nrc.gov/reading-rm/doc-collections/insp-manual/inspection-procedure/index.html>.

SAFEGUARDS

71130.01 - Access Authorization

The inspectors evaluated the access authorization program. The following elements were evaluated:

Access Authorization (1 Sample)

- (1)
 - Tier I: All Requirements
 - Tier II: 6 Requirements (02.06 a – c, 02.07 a – b, 02.08 b)
 - Tier III: 4 Requirements (02.10 a – c, 02.11 a)

71130.08 - Fitness For Duty Program

The inspectors evaluated the fitness for duty program by completing the following inspection elements and conducting an interview with Exelon's newest medical review officer/substance abuse expert, Dr. Linda Bissonnette, that may provide medical services to any Exelon site in Region I:

Fitness For Duty Program (1 Sample)

- (1)
 - Tier I: All Requirements
 - Tier II: 26 Requirements (02.05 a - I, 02.06 a - g, 02.07, 02.08, 02.09 a - e)
 - Tier III: 6 Requirements (02.10, 02.13 d and e, 02.14 a – c)

INSPECTION RESULTS

No findings were identified.

EXIT MEETINGS AND DEBRIEFS

The inspectors verified no proprietary information was retained or documented in this report.

- On January 8, 2020, the inspectors presented the security baseline inspection results to Mr. Frank Stuniolo, Site Vice-President, and other members of the licensee staff.

DOCUMENTS REVIEWED

| Inspection Procedure | Type | Designation | Description or Title | Revision or Date |
|----------------------|-----------------------------|---|---|------------------|
| 71130.01 | Miscellaneous | UAA-2019-03 | INPO Access Authorization Program | 02/28/2019 |
| | Procedures | SY-AA-103-500 | Access Authorization Program | Revision 15 |
| | | SY-AA-103-507 | Review Criteria for Determining Trustworthiness and Reliability | Revision 6 |
| | | SY-AA-103-514 | Site Authorization for Unescorted Access | Revision 19 |
| | | SY-AA-105-511 | Access Authorization In-Processing/Out Processing of Personnel | Revision 25 |
| 71130.08 | Corrective Action Documents | 04167292 | | |
| | | 04216340 | | |
| | | 04247176 | | |
| | | 04202720 | | |
| | | 04107501 | | |
| | | 04107363 | | |
| | | 04274703 | | |
| | | 04215043 | | |
| | | 04167955 | | |
| | | 04302783 | | |
| | 04277429 | | | |
| | 04284399 | | | |
| | Procedures | SY-AA-102 | Exelon Generation Fitness for Duty Program | Revision 21 |
| SY-AA-102-201 | | Call-Outs for Unscheduled Work | Revision 13 | |
| SY-AA-102-203 | | Treatment Plan and Follow-Up Testing | Revision 7 | |
| SY-AA-102-204 | | Random Selection and Notification Process | Revision 13 | |
| SY-AA-102-205 | | Fitness for Duty Appeal Review | Revision 9 | |
| SY-AA-102-206 | | Reporting Use of Medication | Revision 19 | |
| SY-AA-102202 | | Testing for Cause | Revision 20 | |