

March 1, 2002

Mr. Oliver D. Kingsley  
President and CNO  
Exelon Nuclear  
Exelon Generation Company, LLC  
200 Exelon Way, KSA 3-E  
Kennett Square, PA 19348

SUBJECT: ANNUAL ASSESSMENT LETTER - LIMERICK GENERATING STATION  
(REPORT 50-352/02-01, 50-353/02-01)

Dear Mr. Kingsley:

On January 29, 2002, the NRC staff completed its end-of-cycle plant performance assessment of the Limerick Generating Station Units 1 and 2. The end-of-cycle review for Limerick involved the participation of all technical divisions in evaluating performance indicators (PIs) for the most recent quarter and inspection results for the period from April 1 through December 31, 2001. The purpose of this letter is to inform you of our assessment of your safety performance during this period and our plans for future inspections at your facility so that you will have an opportunity to prepare for these inspections and to inform us of any planned inspections which may conflict with your plant activities.

As discussed in our previous annual assessment letter dated May 30, 2001, this inspection and assessment cycle consisted of three quarters (i.e. the second, third, and fourth calendar quarters of calendar year 2001) instead of the usual four quarters. This change was implemented in order to align the inspection and assessment cycle with the calendar year beginning on January 1, 2002.

Overall, both units at the Limerick Generating Station operated in a manner that preserved public health and safety and fully met all cornerstone objectives. Plant performance for the most recent quarter was within the Regulatory Response Column of the NRC's Action Matrix based on two inspection findings of low to moderate safety significance (White), one in the Emergency Preparedness cornerstone which affected both Units and the second in the Barrier Integrity cornerstone which affected only Unit 2. The inspection finding in the Emergency Preparedness cornerstone involved an inadequate critique of an emergency preparedness drill. The significance of this finding was finalized in our letter dated November 19, 2001. The inspection finding in the Barrier Integrity cornerstone involved inadequate measures to identify a degraded Unit 2 safety/relief valve. The significance of this finding was finalized in our letter dated January 11, 2002. We plan to conduct supplemental inspections of these inspection findings as indicated in the attached inspection plan.

Additionally, on October 23, 2001, the staff issued a Severity Level III Notice of Violation in accordance with the Enforcement Policy. The violation was associated with areas inspected and monitored in the Emergency Preparedness cornerstone. We issued the violation after your staff had become aware of and informed us of improper maintenance activities on several off-site sirens. The improper maintenance activities occurred when contractor personnel created false maintenance and testing records and installed jumpers on several off-site sirens that bypassed the siren failure detection circuitry. We have completed an inspection of your actions in response to this violation and found them to be acceptable. Our baseline inspection program will provide us the information to monitor the effectiveness of your long-term corrective actions in response to this Notice of Violation.

The enclosed inspection plan details the inspections scheduled through March 31, 2003. The inspection plan is provided to minimize the resource impact on your staff and to allow for scheduling conflicts and personnel availability to be resolved in advance of inspector arrival onsite. Routine resident inspections are not listed due to their ongoing and continuous nature. The schedule for the last six months of the inspection plan is tentative and may be revised at the Mid-Cycle Review meeting.

Immediately following the terrorist attacks on the World Trade Center and the Pentagon, the NRC issued safeguards advisories recommending that nuclear power plant licensees go to the highest level of security, and all promptly did so. With continued uncertainty about the possibility of additional terrorist activities, the Nation's nuclear power plants, including the Limerick Generating Station, remain at a high level of security. On February 25, 2002, the NRC issued an Order to all nuclear power plant licensees, requiring them to take certain additional interim compensatory measures to address the generalized high-level threat environment. These additional compensatory requirements will provide the NRC with reasonable assurance that public health and safety and the common defense and security continue to be adequately protected in the current generalized high-level threat environment. These requirements will remain in effect pending notification from the Commission that a significant change in the threat environment occurs, or until the Commission determines that other changes are needed following a more comprehensive re-evaluation of current safeguards and security programs. To date, we have monitored Exelon's actions in response to the terrorist attacks through a series of audits. With the issuance of the Order, we will evaluate Exelon's compliance with these interim requirements.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be made available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/NRC/ADAMS/index.html> (the Public Electronic Reading Room).

Oliver D. Kingsley

3

If circumstances arise which cause us to change this inspection plan, we will contact you to discuss the change as soon as possible. Please contact Dr. Mohamed Shanbaky at 610-337-5209 with any questions you may have regarding this letter or the inspection plan.

Sincerely,

/RA/

A. Randolph Blough, Director  
Division of Reactor Projects

Docket Nos. 50-352, 50-353  
Licensee Nos. NPF-39, NPF-85

Enclosure: Limerick Inspection/Activity Plan

cc w/encl: C. G. Pardee, Senior Vice President, Mid-Atlantic Regional Operating Group  
W. Bohlke, Senior Vice President - Nuclear Services  
J. Cotton, Senior Vice President - Operations Support  
J. Skolds, Chief Operating Officer  
M. Gallagher, Director - Licensing Mid-Atlantic Regional Operating Group  
J. Benjamin, Vice President - Licensing and Regulatory Affairs  
W. Levis, Vice President - Limerick Generating Station  
R. C. Braun, Plant Manager, Limerick Generating Station  
M. Kaminski, Manager, Regulatory Assurance  
Chief - Division of Nuclear Safety  
Secretary, Nuclear Committee of the Board  
E. Cullen, Vice President, General Counsel  
Correspondence Control Desk  
Commonwealth of Pennsylvania

Distribution w/encl: H. Miller, RA/J. Wiggins, DRA  
 M. Shanbaky, DRP  
 D. Florek, DRP  
 J. Talieri, DRP  
 S. Iyer, DRP  
 A. Blough, DRP  
 W. Lanning, DRS  
 B. Holian, DRP  
 R. Crlenjak, DRS  
 DRS Branch Chiefs (5)  
 B. Welling, DRP - Senior Resident Inspector  
 L. Cheung, DRS  
 K. Young, DRS  
 J. Noggle, DRS  
 G. Smith, DRS  
 N. McNamara, DRS  
 T. Bergman, RI EDO Coordinator  
 E. Adensam, NRR  
 C. Gratton, PM, NRR  
 J. Boska, PM, NRR (Backup)  
 Region I Docket Room (with concurrences)  
 RidsNrrDipmlipb

DOCUMENT NAME: G:\BRANCH4\Assessment\LIM\Limerick EOC Letter 3-2002.wpd  
 After declaring this document "An Official Agency Record" it **will/will not** be released to the Public. **To receive a copy of this document, indicate in the box: "C"** = Copy without attachment/enclosure **"E"** = Copy with attachment/enclosure **"N"** = No copy

OFFICE	RI/DRP	RI/DRP	RI/DRP
NAME	DFlorek/DF	MShanbaky/MS	ABlough/AB
DATE	02/28 /02	02/28/02	03/01/02

OFFICIAL RECORD COPY

**Limerick**  
**Inspection / Activity Plan**  
**12/30/2001 - 03/31/2003**

Unit Number	Inspection Activity	Title	No. of Staff on Site	Planned Dates		Inspection Type
				Start	End	
	<b>7112103 - OCC RAD SAFETY - CALIBRATION</b>		<b>1</b>			
1, 2	IP 7112103	Radiation Monitoring Instrumentation		01/07/2002	01/11/2002	Baseline Inspections
	<b>71130 - SECURITY</b>		<b>1</b>			
1, 2	IP 7113001	Access Authorization Program (Behavior Observation Only)		01/14/2002	01/18/2002	Baseline Inspections
1, 2	IP 7113002	Access Control (Search of Personnel, Packages, and Vehicles: Identification and Authorizatio		01/14/2002	01/18/2002	Baseline Inspections
	<b>71121 - OCC RAD SAFETY</b>		<b>1</b>			
1, 2	IP 7112101	Access Control to Radiologically Significant Areas		01/28/2002	02/01/2002	Baseline Inspections
1, 2	IP 7112102	ALARA Planning and Controls		01/28/2002	02/01/2002	Baseline Inspections
	<b>7111108 - INSERVICE INSPECTION</b>		<b>1</b>			
1	IP 7111108	Inservice Inspection Activities		03/11/2002	03/15/2002	Baseline Inspections
	<b>71121 - OCC RAD SAFETY</b>		<b>1</b>			
1	IP 7112101	Access Control to Radiologically Significant Areas		03/08/2002	03/14/2002	Baseline Inspections
1	IP 7112102	ALARA Planning and Controls		03/08/2002	03/14/2002	Baseline Inspections
	<b>7112202 - PUB RAD SAFETY - RADWASTE</b>		<b>1</b>			
1, 2	IP 7112202	Radioactive Material Processing and Transportation		04/22/2002	04/26/2002	Baseline Inspections
	<b>7111401 - EP EXERCISE &amp; PI VERIFICATION</b>		<b>4</b>			
1, 2	IP 7111401	Exercise Evaluation		05/06/2002	05/10/2002	Baseline Inspections
1, 2	IP 71151	Performance Indicator Verification		05/06/2002	05/10/2002	Baseline Inspections
1, 2	IP 95001	Supplemental Inspection For One Or Two White Inputs In A Strategic Performance Area		05/06/2002	05/10/2002	Supplemental Program
	<b>6/3+EXM - LM/PB LSRO INITIAL EXAMS</b>		<b>3</b>			
1	U01512	LSRO LIMERICK INITIAL EXAM (6/3-9/02)		05/13/2002	05/17/2002	Not Applicable
1	U01512	LSRO LIMERICK INITIAL EXAM (6/3-9/02)		06/03/2002	06/14/2002	Not Applicable
	<b>7112203 - PUB RAD SAFETY - REMP</b>		<b>1</b>			
1, 2	IP 7112203	Radiological Environmental Monitoring Program		05/06/2002	05/10/2002	Baseline Inspections
	<b>7111111B - LM/PB LSRO REQUALIFICATION PROGRAM @ LM</b>		<b>2</b>			
1, 2	IP 7111111B	Licensed Operator Requalification		05/20/2002	05/24/2002	Baseline Inspections
	<b>71152B - PI&amp;R &amp; 95001</b>		<b>4</b>			
1, 2	IP 71152B	Identification and Resolution of Problems		06/03/2002	06/07/2002	Baseline Inspections
2	IP 95001	Supplemental Inspection For One Or Two White Inputs In A Strategic Performance Area		06/03/2002	06/07/2002	Supplemental Program
1, 2	IP 71152B	Identification and Resolution of Problems		06/17/2002	06/21/2002	Baseline Inspections
	<b>71130 - SECURITY-RESPONSE ATT3</b>		<b>2</b>			
1, 2	IP 7113003	Response to Contingency Events (Protective Strategy and Implementation of Protective Strate		07/15/2002	07/19/2002	Baseline Inspections
	<b>7112102 - OCC RAD SAFETY - ALARA</b>		<b>1</b>			
1, 2	IP 7112102	ALARA Planning and Controls		07/22/2002	07/26/2002	Baseline Inspections

This report does not include INPO and OUTAGE activities.  
This report shows only on-site and announced inspection procedures.

**Limerick**  
**Inspection / Activity Plan**  
**12/30/2001 - 03/31/2003**

Unit Number	Inspection Activity	Title	No. of Staff on Site	Planned Dates		Inspection Type
				Start	End	
	<b>711117B - MODS &amp; 50.59</b>		<b>3</b>			
1, 2	IP 7111102	Evaluation of Changes, Tests, or Experiments		08/19/2002	08/23/2002	Baseline Inspections
	<b>10/7 EXM - OPERATOR LICENSING INITIAL EXAMS</b>		<b>3</b>			
1	U01437	LIMERICK 1&2 O/L INITIAL EXAM 3/25-4/5/2002		09/09/2002	09/13/2002	Not Applicable
1	U01437	LIMERICK 1&2 O/L INITIAL EXAM 3/25-4/5/2002		10/07/2002	10/11/2002	Not Applicable
	<b>7112201 - PUB RAD SAFETY - RETS</b>		<b>1</b>			
1, 2	IP 7112201	Radioactive Gaseous and Liquid Effluent Treatment and Monitoring Systems		09/16/2002	09/20/2002	Baseline Inspections
	<b>711112B - MAINTENANCE RULE</b>		<b>1</b>			
1, 2	IP 711112B	Maintenance Rule Implementation		11/18/2002	11/22/2002	Baseline Inspections
	<b>7112102 - OCC RAD SAFETY - ALARA</b>		<b>1</b>			
1, 2	IP 7112102	ALARA Planning and Controls		01/28/2003	01/30/2003	Baseline Inspections
	<b>71121 - OCC RAD SAFETY</b>		<b>1</b>			
1, 2	IP 7112101	Access Control to Radiologically Significant Areas		03/10/2003	03/14/2003	Baseline Inspections
1, 2	IP 7112102	ALARA Planning and Controls		03/10/2003	03/14/2003	Baseline Inspections
	<b>7111108 - INSERVICE INSPECTION</b>		<b>1</b>			
2	IP 7111108	Inservice Inspection Activities		03/24/2003	03/28/2003	Baseline Inspections