August 30, 2004

Mr. Christopher M. Crane President and CNO Exelon Nuclear Exelon Generation Company, LLC 200 Exelon Way KSA 3-E Kennett Square, PA 19348

# SUBJECT: MID-CYCLE PERFORMANCE REVIEW AND INSPECTION PLAN - LIMERICK GENERATING STATION

Dear Mr. Crane:

On August 3, 2004, the NRC staff completed its mid-cycle plant performance assessment of the Limerick Generating Station Units 1 and 2. The mid-cycle review for Limerick involved the participation of all technical divisions in evaluating performance for the first half of the calendar year 2004 assessment cycle. The process included a review of performance indicators (PIs) for the most recent calendar quarter and inspection results over the previous 12 months (July 1, 2003 to June 30, 2004). 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 inspection plan do not include physical protection information. A separate letter designated and marked as "Proprietary Information in accordance with 10 CFR 2.390(d)(1)" will include the physical protection plan.

Plant performance for the most recent quarter was within the Licensee Response Column of the NRC's Action Matrix, based on all inspection findings being classified as having very low safety significance (Green) and all PIs indicating performance at a level requiring no additional NRC oversight (Green). Therefore, we plan to conduct only reactor oversight process (ROP) baseline inspections at your facility through March 31, 2005.

The enclosed inspection plan details the inspection, less those related to physical protection, scheduled through March 31, 2006. The plan contains an inspection using Temporary Instruction (TI) 2515/159 "Review of Generic Letter 89-13, Service Water System Problems Affecting Safety-Related Equipment." This TI was developed in response to recommendations from Davis-Besse Reactor Vessel Head Degradation Lessons-Learned Task Force and is being performed at a sample of nuclear power plants across the country. 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 inspections in the last twelve months of the inspection plan are tentative and may be revised at the end-of-cycle review meeting.

Mr. Christopher M. Crane

In accordance with 10 CFR 2.390 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 <a href="http://www.nrc.gov/reading-rm/adams.html">http://www.nrc.gov/reading-rm/adams.html</a> (the Public Electronic Reading Room).

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 me at 610-337-5209 with any questions you may have regarding this letter or the inspection plan.

Sincerely,

/**RA**/

Mohamed Shanbaky, Chief Projects Branch 4 Division of Reactor Projects

Docket Nos. 50-352; 50-353 License Nos. NPF-39, NPF-85

Enclosure: Limerick Inspection/Activity Plan

Mr. Christopher M. Crane

cc w/encl:

Chief Operating Officer, Exelon Generation Company, LLC Site Vice President - Limerick Generating Station Plant Manager, Limerick Generating Station **Regulatory Assurance Manager - Limerick** Senior Vice President - Nuclear Services Vice President - Mid-Atlantic Operations Vice President - Operations Support Vice President - Licensing and Regulatory Affairs Director - Licensing and Regulatory Affairs, Exelon Generation Company, LLC Manager, Licensing - Limerick Generation Station Vice President, General Counsel and Secretary Associate General Counsel, Exelon Generation Company Correspondence Control Desk J. Johnsrud, National Energy Committee Chairman, Board of Supervisors of Limerick Township R. Janati, Chief, Division of Nuclear Safety, Pennsylvania Bureau of Radiation Protection J. Bradley Fewell, Assistant General Counsel, Exelon Nuclear D. Allard, Director, Dept. of Environmental Protection, Bureau of Radiation Protection (SLO) Institute of Nuclear Power Operations (INPO)

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Mr. Christopher M. Crane

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<b>OFFICE</b>	RI / DRP	RI / DRP					
NAME	ABurritt/ <b>ALB</b>	MShanbaky/MMS					
DATE	08/27/04	08/27/04	08/	/04	08/	/04	

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#### Report 22

#### Limerick Inspection / Activity Plan 07/01/2004 - 03/31/2006

Unit			No. of Staff	Planned Dates		Inspection	
Number	Inspection Activity	Title	on Site	Start	End	Туре	
ROP-5-3- THIRD QUARTER RESIDENT REPORT3							
1	IP 7111101	Adverse Weather Protection		07/01/2004	09/30/2004	Baseline Inspections	
1	IP 7111104	Equipment Alignment (Quarterly)		07/01/2004	09/30/2004	Baseline Inspections	
1	IP 7111104S	Equipment Alignment		07/01/2004	09/30/2004	Baseline Inspections	
1	IP 7111105A	Fire Protection		07/01/2004	09/30/2004	Baseline Inspections	
1	IP 7111105Q	Fire Protection		07/01/2004	09/30/2004	Baseline Inspections	
1	IP 7111106	Flood Protection Measures		07/01/2004	09/30/2004	Baseline Inspections	
1	IP 7111107A	Heat Sink Performance		07/01/2004	09/30/2004	Baseline Inspections	
1	IP 7111111Q	Licensed Operator Requalification Program		07/01/2004	09/30/2004	Baseline Inspections	
1	IP 7111112Q	Maintenance Effectiveness		07/01/2004	09/30/2004	Baseline Inspections	
1	IP 7111113	Maintenance Risk Assessments & Emergent Work Evaluation		07/01/2004	09/30/2004	Baseline Inspections	
1	IP 7111114	Personnel Performance Related to Nonroutine Plant Evolutions and Events		07/01/2004	09/30/2004	Baseline Inspections	
1	IP 7111115	Operability Evaluations		07/01/2004	09/30/2004	Baseline Inspections	
1	IP 7111116	Operator Workarounds		07/01/2004	09/30/2004	Baseline Inspections	
1	IP 7111117A	Permanent Plant Modifications		07/01/2004	09/30/2004	Baseline Inspections	
1	IP 7111119	Post Maintenance Testing		07/01/2004	09/30/2004	Baseline Inspections	
1	IP 7111123	Temporary Plant Modifications		07/01/2004	09/30/2004	Baseline Inspections	
1	IP 7111406	Drill Evaluation		07/01/2004	09/30/2004	Baseline Inspections	
1	IP 71151	Performance Indicator Verification		07/01/2004	09/30/2004	Baseline Inspections	
1	IP 71152	Identification and Resolution of Problems		07/01/2004	09/30/2004	Baseline Inspections	
1	IP 71153	Event Followup		07/01/2004	09/30/2004	Baseline Inspections	
	7112103 - OCC F	AD SAFETY - INSTRUMENTATION	1				
1, 2	IP 7112103	Radiation Monitoring Instrumentation and Protective Equipment		07/19/2004	07/23/2004	Baseline Inspections	
	71151 - EP PI	VERIFICATION	1				
1, 2	IP 71151	Performance Indicator Verification		08/02/2004	08/06/2004	Baseline Inspections	
	71111.05 - TRIEN	NIAL FIRE PROTECTION INSPECTION	4				
1, 2	IP 7111105T	Fire Protection		10/04/2004	10/08/2004	Baseline Inspections	
1, 2	IP 7111105T	Fire Protection		10/18/2004	10/22/2004	Baseline Inspections	
		BESSE ACTION ITEM-GL89-13 REVIEW	3				
1, 2	IP 2515/159	Review of Generic Letter 89-13: Service Water System Problems Affecting Safety-Related Equi		09/13/2004	09/17/2004	Safety Issues	
			1				
1, 2	IP 7111112B		2	09/13/2004	09/17/2004	Baseline Inspections	
			2	40/04/0000	40/04/0000 1	Des l'es la serie	
1	IP 7111101	Adverse Weather Protection		10/01/2004	12/31/2004	Baseline Inspections	
-	This report does not include	INPO and OUTAGE activities.					

This report does not include INPO and OUTAGE activities. This report shows only on-site and announced inspection procedures. Page 2 of 3

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#### Limerick Inspection / Activity Plan 07/01/2004 - 03/31/2006

Unit Number	Inspection Activity	Title	No. of Staff on Site	Planne Start	d Dates End	Inspection Type
Tumber			2			1 136
1	IP 7111104	Equipment Alignment (Quarterly)	2	10/01/2004	12/31/2004	Baseline Inspections
1	IP 7111104S	Equipment Alignment		10/01/2004	12/31/2004	Baseline Inspections
1	IP 7111105A	Fire Protection		10/01/2004	12/31/2004	Baseline Inspections
1	IP 7111105Q	Fire Protection		10/01/2004	12/31/2004	Baseline Inspections
1	IP 7111106	Flood Protection Measures		10/01/2004	12/31/2004	Baseline Inspections
1	IP 7111107A	Heat Sink Performance		10/01/2004	12/31/2004	Baseline Inspections
1	IP 7111111Q	Licensed Operator Requalification Program		10/01/2004	12/31/2004	Baseline Inspections
1	IP 7111112Q	Maintenance Effectiveness		10/01/2004	12/31/2004	Baseline Inspections
1	IP 7111113	Maintenance Risk Assessments & Emergent Work Evaluation		10/01/2004	12/31/2004	Baseline Inspections
1	IP 7111114	Personnel Performance Related to Nonroutine Plant Evolutions and Events		10/01/2004	12/31/2004	Baseline Inspections
1	IP 7111115	Operability Evaluations		10/01/2004	12/31/2004	Baseline Inspections
1	IP 7111116	Operator Workarounds		10/01/2004	12/31/2004	Baseline Inspections
1	IP 7111117A	Permanent Plant Modifications		10/01/2004	12/31/2004	Baseline Inspections
1	IP 7111119	Post Maintenance Testing		10/01/2004	12/31/2004	Baseline Inspections
1	IP 7111123	Temporary Plant Modifications		10/01/2004	12/31/2004	Baseline Inspections
1	IP 7111406	Drill Evaluation		10/01/2004	12/31/2004	Baseline Inspections
1	IP 71151	Performance Indicator Verification		10/01/2004	12/31/2004	Baseline Inspections
1	IP 71152	Identification and Resolution of Problems		10/01/2004	12/31/2004	Baseline Inspections
1	IP 71153	Event Followup		10/01/2004	12/31/2004	Baseline Inspections
	7112202 - PUB F	RAD SAFETY - RADWASTE	1			·
1, 2	IP 7112202	Radioactive Material Processing and Transportation		10/18/2004	10/22/2004	Baseline Inspections
	7112201 - PUB F	RAD SAFETY - RETS	1			
1, 2	IP 7112201	Radioactive Gaseous and Liquid Effluent Treatment and Monitoring Systems		10/25/2004	10/29/2004	Baseline Inspections
	1/10+EXM - OPER	ATOR LICENSING INITIAL EXAMS	3			
1	U01533	LIMERICK INITIAL EXAM (8/1/05)		12/06/2004	12/10/2004	Not Applicable
1	U01533	LIMERICK INITIAL EXAM (8/1/05)		01/10/2005	01/21/2005	Not Applicable
	7111117B - MODS & 50.59					
1, 2	IP 7111102	Evaluation of Changes, Tests, or Experiments		11/15/2004	11/19/2004	Baseline Inspections
1, 2	IP 7111117B	Permanent Plant Modifications		11/15/2004	11/19/2004	Baseline Inspections
		RAD SAFETY - ACCESS	1			
1, 2	IP 7112101	Access Control to Radiologically Significant Areas		01/31/2005	02/04/2005	Baseline Inspections
		RVICE INSPECTION - U2	1			
2	IP 7111108G	Inservice Inspection Activities - BWR		03/07/2005	03/11/2005	Baseline Inspections
-	This report does not include	INPO and OLITAGE activities				

This report does not include INPO and OUTAGE activities. This report shows only on-site and announced inspection procedures. Page 3 of 3

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## Limerick Inspection / Activity Plan 07/01/2004 - 03/31/2006

Unit			No. of Staff	Planned Dates		Inspection
Number	Inspection Activity	Title	on Site	Start	End	Туре
	7112102 - OCC R	AD SAFETY - ALARA	1			
2	IP 7112102	ALARA Planning and Controls		03/14/2005	03/18/2005	Baseline Inspections
	6/6 EXM - LM/PB	(LSRO) L.O. INITIAL EXAM	2			
1	U01541	LIMERICK/PEACH BOTTOM LSRO INITIAL EXAM (6/5 -10/05)		05/16/2005	05/20/2005	Not Applicable
1	U01541	LIMERICK/PEACH BOTTOM LSRO INITIAL EXAM (6/5 -10/05)		06/13/2005	06/24/2005	Not Applicable
	71114 - EP PR	1				
1, 2	IP 7111402	Alert and Notification System Testing		07/18/2005	07/22/2005	Baseline Inspections
1, 2	IP 7111403	Emergency Response Organization Augmentation Testing		07/18/2005	07/22/2005	Baseline Inspections
1, 2	IP 7111404	Emergency Action Level and Emergency Plan Changes		07/18/2005	07/22/2005	Baseline Inspections
1, 2	IP 7111405	Correction of Emergency Preparedness Weaknesses and Deficiencies		07/18/2005	07/22/2005	Baseline Inspections
	7111111B - LO RE	QUAL PROGRAM INSPECTION	2			
1, 2	IP 7111111B	Licensed Operator Requalification Program		08/21/2005	08/26/2005	Baseline Inspections
	7111121 - SSDI		6			
1, 2	IP 7111121	Safety System Design and Performance Capability		10/17/2005	11/11/2005	Baseline Inspections
	7111401 - EXERO	CISE EVALUATION & EP PI VERIFICATION	1			
1, 2	IP 7111401	Exercise Evaluation		11/14/2005	11/18/2005	Baseline Inspections
1, 2	IP 71151	Performance Indicator Verification		11/14/2005	11/18/2005	Baseline Inspections
	7112101 - OCC R	AD SAFETY	1			
1, 2	IP 7112101	Access Control to Radiologically Significant Areas		01/09/2006	01/13/2006	Baseline Inspections
	7112203 - PUB R	AD SAFETY - REMP	1			
1, 2	IP 7112203	Radiological Environmental Monitoring Program		01/30/2006	02/03/2006	Baseline Inspections
	7111108G - INSER	VICE INSPECTION - UNIT 1	1			
1	IP 7111108G	Inservice Inspection Activities - BWR		03/13/2006	03/17/2006	Baseline Inspections