

December 16, 2003

Mr. John L. Skolds  
President and CNO  
Exelon Nuclear  
Exelon Generation Company, LLC  
4300 Winfield Road  
5th Floor  
Warrenville, IL 60555

SUBJECT: LIMERICK GENERATING STATION - NRC EVALUATED EMERGENCY  
PREPAREDNESS EXERCISE - INSPECTION REPORT NOS. 50-352/2003008;  
50-353/2003008

Dear Mr. Skolds:

The enclosed report documents an inspection at the Limerick Generating Station which evaluated the performance of your emergency response organization during the November 18, 2003, full-participation exercise and the post-exercise critique as specified in the reactor oversight program. The inspectors discussed the findings of this inspection with Mr. Ron DeGregorio and other members of your staff at the exit meeting on November 21, 2003.

This inspection was an examination of activities conducted under your license as they relate to safety and compliance with the Commission's rules and regulations and with the conditions of your license. Within these areas, the inspection consisted of a selected examination of procedures and representative records, observations of activities, and interviews with personnel.

Based on the results of this inspection, no findings of significance were identified.

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Should you have any questions regarding this report, please contact me at (610) 337-5183.

Sincerely,

*/RA/*

Richard J. Conte, Chief  
Operational Safety Branch  
Division of Reactor Safety

Mr. John L. Skolds

2

Docket Nos: 50-352, 50-353,  
License Nos: NPF-39, NPF-85

Enclosure: Inspection Report Nos. 05000352/2003008; 05000353/2003008

cc w/encl:

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Senior Vice President - Nuclear Services  
Vice President - Mid-Atlantic Operations Support  
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Mr. John L. Skolds

3

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U. S. NUCLEAR REGULATORY COMMISSION REGION I

REGION I

Docket Nos: 50-352, 50-353

License Nos: NPF-39, NPF-85

Report Nos: 05000352/2003008, 05000353/2003008

Licensee: Exelon Nuclear, LLC

Facility: Limerick Generating Station

Location: Limerick, Pennsylvania

Dates: November 18 - 21, 2003

Inspectors: D. Silk, Sr. Emergency Preparedness Inspector, Division of Reactor Safety (DRS), (Lead)  
N. McNamara, Emergency Preparedness Inspector, DRS  
D. Florek, Project Engineer, Branch 4, DRP  
P. Elkmann, Emergency Preparedness Inspector, DRS, NRC Region IV

Observers: K. Brock, Health Physicist, NRR  
R. Kahler, Emergency Preparedness Specialist, NRR  
S. Woods, Health Physicist / Project Manager, NMSS  
D. Werkheiser, Reactor Inspector, DRS  
T. Rhoads, Reactor Inspector, DRS  
B. Rini, Physical Scientist, NRR

Approved by: Richard J. Conte, Chief  
Operational Safety Branch  
Division of Reactor Safety

## SUMMARY OF FINDINGS

IR 05000352/2003-008, IR 05000353/2003-008; 11/18-11/21/03; Limerick Generating Station; Emergency Preparedness Exercise Report.

This inspection was conducted by region based inspectors from NRC Regions I and IV. The NRC's program for overseeing the safe operation of commercial nuclear power reactors is described in NUREG-1649, "Reactor Oversight Process," Revision 3, dated July 2000.

### **A. NRC-Identified Findings**

Cornerstone: Emergency Preparedness

- No findings of significance were identified.

### **B. Licensee-Identified Findings**

- No findings of significance were identified.

## Report Details

### 1. **REACTOR SAFETY**

Cornerstone: Emergency Preparedness (EP)

#### 1EP1 Exercise Evaluation

##### a. Inspection Scope

Prior to the exercise, an in-office review was conducted of the exercise objectives and scenario submitted to the NRC to determine if the exercise would test major elements of the emergency plan as required by 10 CFR 50.47(b)(14).

The onsite inspection consisted of the following review and assessment:

- The adequacy of Exelon's performance on the biennial full-participation exercise was reviewed by primarily focusing on the implementation of the risk-significant planning standards (RSPS) in 10 CFR 50.47 (b) (4), (5), (9) & (10) which are emergency classification, offsite notification, radiological assessment, and protective action recommendations, respectively.
- The overall adequacy of Exelon's emergency response facilities and its implementation of NUREG-0696, "Functional Criteria for Emergency Response Facilities" and Emergency Plan commitments. The facilities assessed were the simulator, Technical Support Center (TSC), Operations Support Center (OSC) Emergency Operations Facility (EOF), and Joint Information Center (JIC).
- Other performance areas besides the RSPS, such as the emergency response organization's (ERO) recognition of abnormal plant conditions, command and control, intra- and inter-facility communications, prioritization of mitigation activities, utilization of repair and field monitoring teams, interface with offsite agencies, and the overall implementation of the emergency plan and its implementing procedures.
- Past performance issues from NRC inspection reports and Exelon's drill reports to determine effectiveness of corrective actions as demonstrated during this exercise to ensure compliance with 10CFR50.47(b)(14).
- The post-exercise critique to evaluate Exelon's self-assessment of its ERO performance during the exercise and to ensure compliance with 10CFR50 Appendix E.IV.F.2.g.

The inspectors reviewed various documents which are listed in Attachment 1 to this report.

##### b. Findings

No findings of significance were identified.

### 4. **OTHER ACTIVITIES (OA)**

#### 40A2 Identification and Resolution of Problems

##### a. Inspection Scope

The inspectors reviewed Exelon's critique findings as documented in recent exercise and drill reports. This review was conducted to determine if significant performance trends exist and to determine the effectiveness of licensee corrective actions based upon ERO performance during this exercise. The inspectors verified that issues identified during this exercise were entered into Exelon's corrective action program (See attachment listing condition reports). The inspection was conducted in accordance with NRC Inspection Procedure 71114, Attachment 01, 10 CFR 50.47(b)(14), and Appendix E IV.F.2.g were used as reference criteria

##### b. Findings

No findings of significance were identified.

#### 40A6 Meetings, Including Exit

The inspectors presented the inspection results to Mr. Ron DeGregorio, and other members of the licensee's staff at the conclusion of the inspection on November 21, 2003. The licensee had no objections to the NRC findings or observations. No proprietary information was provided to the inspectors during this inspection.

## KEY POINTS OF CONTACT

### Licensee Personnel

C. Arnone, Emergency Preparedness Director  
 A. Coppa, Limerick Emergency Preparedness Coordinator  
 R. DeGregorio, Site Vice President  
 B. Hanson, Limerick Plant Manager  
 R. Harding, Regulatory Assurance Staff  
 R. Kaminski, Emergency Preparedness, KSA  
 J. Karkoska, Emergency Preparedness Manager  
 R. Mandick, Limerick Emergency Preparedness Staff

## LIST OF ITEMS OPENED, CLOSED, AND DISCUSSED

### Opened/Closed/Discussed

None

## LIST OF DOCUMENTS REVIEWED

Limerick May 7, 2002 Biennial Exercise Evaluation Report  
 Limerick Generating Station September 20, 2002 DEP Drill Evaluation Report  
 Limerick Generating Station December 10, 2002 Training Drill Report  
 Limerick Generating Station May - June 2003 Training Drill Series Evaluation Report  
 Limerick September 25, 2003 Exercise Evaluation Report

## CONDITION REPORTS GENERATED

CR-187643, Simulator Control Room T-104 Issue  
 CR-187408, Technical Support Center PA System Issue  
 CR-187408, Operations Support Center Performance Issues  
 CR-187648, Controller Demonstration Criteria Grading Issue  
 CR-187581, All Other Failed Demonstration Criteria  
 CR-187690, Review Implementation of the Flooding EAL

## LIST OF ACRONYMS

EOF	Emergency Operations Facility
EP	Emergency Preparedness
ERO	Emergency Response Organization
JIC	Joint Information Center
OSC	Operations Support Center
PAR	Protective Action Recommendation
RSPS	Risk Significant Planning Standard
TSC	Technical Support Center