

May 30, 2002

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;
50-353/01-015

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 May 7, 2002, full-participation exercise, the post-exercise critique, and the emergency preparedness performance indicators as specified in the reactor oversight program. The inspectors discussed the findings of this inspection with Mr. William Levis and other members of your staff at the exit meeting on May 9, 2002.

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.

Exercises are required to be conducted on a biennial cycle. Due to the impact of the events on September 11, 2001, your exercise scheduled for the week of October 29, 2001, was postponed. Your October 16, 2001, letter requested a schedular exemption from performing the required biennial exercise in the year 2001. This request was granted by the NRC in a letter dated December 20, 2001, which permitted you to reschedule that exercise to sometime in the year 2002. Your May 7, 2002, exercise was the fulfillment of commitments related to the exemption. You will be required to resume the original biennial exercise schedule with an exercise in the year 2003.

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Mr. John L. Skolds

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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

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

Enclosure: Inspection Report Nos. 50-352; 50-353/01-015

cc w/encl: Senior Vice President, Mid-Atlantic Regional Operating Group
Senior Vice President - Nuclear Services
Vice President - Mid-Atlantic Operations Support
Chairman, Nuclear Review Board
Director - Licensing, Mid-Atlantic Regional Operating Group
Vice President - Licensing and Regulatory Affairs
Site Vice President - Limerick Generating Station
Plant Manager, Limerick Generating Station
Regulatory Assurance Manager - Limerick
Chief - Division of Nuclear Safety
Secretary, Nuclear Committee of the Board
Vice President, General Counsel and Secretary
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Manager, Licensing - Limerick and Peach Bottom
Commonwealth of Pennsylvania

Mr. John L. Skolds

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U. S. NUCLEAR REGULATORY COMMISSION

REGION I

Docket Nos: 50-352
50-353

License Nos: NPF-39
NPF-85

Report Nos: 50-352/01-015
50-353/01-015

Licensee: Exelon Nuclear, LLC

Facility: Limerick Generating Station

Dates: May 6 - 9, 2002

Inspectors: D. Silk, Sr. Emergency Preparedness Inspector, DRS (Lead)
N. McNamara, Emergency Preparedness Inspector, DRS
B. Welling, Resident Inspector, Limerick, DRP
R. Nimitz, Sr. Health Physicist, DRS

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

SUMMARY OF FINDINGS

IR 05000352/01-015, IR 05000353/01-015; Exelon Nuclear LLC; 05/6-05/9/2002; Limerick Generating Stations; Emergency Preparedness and Performance Indicator Verification.

This inspection was conducted by region based inspectors and the resident inspector. 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.

Cornerstone: Emergency Preparedness

- No findings of significance were identified.

Report Details

1. REACTOR SAFETY

Cornerstone: Emergency Preparedness (EP)

1EP1 Exercise Evaluation

a. Inspection Scope

The inspectors reviewed and assessed:

- Exercise objectives and scenario to determine if the Limerick exercise would test major elements of the licensee's emergency plan as required by 10 CFR 50.47(b)(14).
- The licensee's biennial full-participation exercise performance 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 (PARs), respectively.
- The overall adequacy of the licensee's emergency response facilities and their implementation of NUREG-0696, Functional Criteria for Emergency Response Facilities, and emergency plan commitments. The facilities assessed were the simulator control room (SCR), technical support center (TSC), the operations support center (OSC), the emergency operations facility (EOF), and the emergency news center (ENC).
- 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 licensee's emergency plan and implementing procedures.
- Past performance issues from NRC inspection reports and licensee 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 the licensee's self-assessment of their ERO performance during the exercise and to ensure compliance with 10CFR50 Appendix E.IV.F.2.g.

b. Findings

No findings of significance were identified.

4. OTHER ACTIVITIES (OA)

4OA1 Performance Indicator (PI) Verification

a. Inspection Scope

The inspectors reviewed the licensee's process for identifying and collecting data that is utilized to determine the values for the three EP PIs:

- Drill and Exercise Performance
- ERO Drill Participation, and
- Alert and Notification System Reliability.

Since the EP PIs were last reviewed during an inspection in August 2001, this review assessed data and records from that time which included results from the third and fourth quarters of 2001 and the first quarter of 2002. Records included drill reports, documents generated during drills or exercises, attendance records, and siren testing documentation. The review was conducted on site in accordance with NRC Inspection Procedure 71151. The acceptance criteria are 10 CFR 50.9 and NEI 99-02, Revision 2, Regulation Assessment Performance Indicator Guideline.

b. Findings

No findings of significance were identified.

4OA2 Identification and Resolution of Problems

a. Inspection Scope

The inspectors reviewed licensee findings (EP drill reports) for approximately the past year pertaining to drills, and the last licensee biennial exercise critique 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 also verified that issues identified during this exercise were entered into the licensee's corrective action program and are as follows:

CR 108336	Delay in activating the ERO
CR 108338	Recovery action plans
CR 108339	SCR areas for improvement
CR 108348	TSC support and actions during the release
CR 108351	TSC participant critique
CR 108355	Identification of second alert condition
CR 108359	TSC areas for improvement
CR 108361	Timely dispatching of OSC teams
CR 108367	Repair team not prepared and dispatched properly
CR 108375	OSC Areas for Improvement
CR 108397	EOF areas for improvement
CR 108410	News center areas for improvement
CR 1083815	Better assessment of conditions pertaining to the release

b. Findings

No findings of significance were identified.

40A5 Other Activities

NRC inspection finding FIN 50-352:50-353/01-016-01 dealt with the inadequate critique of an operator crew drill. At the time of the initiation of this finding, there was no color or significance assigned. However, in the November 19, 2001, letter to the licensee, the final significance determination for the finding was issued as White. At that time the finding should have been closed because it was not a violation. It was not closed due to administrative oversight. Therefore, FIN 50-352:50-353/01-016-01 is being administratively closed in this report. NRC follow up of this issue will still be covered by Supplemental Inspection Procedure 95001 at a revised date pending a report of readiness from licensee representatives. The supplemental inspection was postponed from the week of the inspection at the licensee's request.

40A6 Meetings, including Exit

The inspectors presented the inspection results to Mr. William Levis, and other members of the licensee's staff at the conclusion of the inspection on May 9, 2002. 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

John Karkoska, Limerick EP Coordinator
 William Levis, Site Vice President
 Robert Mandick, Limerick EP staff
 Donald Tailleart, Exelon EP Manager

LIST OF ITEMS OPENED, CLOSED, AND DISCUSSED

Opened

None

Closed

FIN 50-352:50-353/01-016-01 Inadequate drill critique

Discussed

None

LIST OF DOCUMENTS REVIEWED

LS-AA-2110, Monthly Performance Indicator (PI) Data Elements for Emergency Response Organization (ERO) Drill Participation, Rev 2
 LS-AA-2120, Monthly Performance Indicator (PI) Data Elements for Drill/Exercise Performance, Rev 2
 LS-AA-2130, Monthly Performance Indicator (PI) Data Elements for Alert and Notification System (ANS) Reliability, Rev 2
 EP-MA-125-1002, Collection and Evaluation of Data for Indicator R.EP.01, "Drill and Exercise Performance"
 EP-MA-125-1003, Collection and Evaluation of Data for Indicator R.EP.02, "Emergency Response Organization Participation"
 EP-MA-125-1003, Collection and Evaluation of Data for Indicator R.EP.03, "Alert and Notification System Reliability"

LIST OF ACRONYMS

EOF	Emergency Operations Facility
EP	Emergency Preparedness
ENC	Emergency News Center
ERO	Emergency Response Organization
OSC	Operations Support Center
PAR	Protective Action Recommendation
PI	Performance Indicator
RSPS	Risk Significant Planning Standard
SCR	Simulator Control Room
TSC	Technical Support Center