

Mr. James A. Hutton  
 Director-Licensing, MC 62A-1  
 PECO Energy Company  
 Nuclear Group Headquarters  
 Correspondence Control Desk  
 P.O. Box No. 195  
 Wayne, PA 19087-0195

January 12, 2000

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION - DIGITAL POWER RANGE  
 NEUTRON MONITORING SYSTEM, LIMERICK 1 AND 2 (TAC NOS. MA6965  
 AND MA6966)

Dear Mr. Hutton:

By letter dated October 14, 1999, you submitted a request for a license amendment to revise the Limerick Generating Station, Units 1 and 2, Technical Specifications (TSs). The proposed revisions are necessary to support the installation of a digital Power Range Neutron Monitoring (PRNM) System to replace the existing PRNM system. Based on our review of your submittal, we find that additional information, as delineated in the enclosure, is required to continue our evaluation. On Friday, December 17, 1999, we discussed the additional information being requested with your staff and a 30-day response from the date of receipt of this letter was mutually agreeable.

Sincerely,

Original signed by:

Bartholomew C. Buckley, Sr. Project Manager, Section 2  
 Project Directorate I  
 Division of Licensing Project Management  
 Office of Nuclear Reactor Regulation

Docket Nos. 50-352 and 50-353  
 cc: See next page

DISTRIBUTION:

File Center	JClifford	LBerry
PUBLIC	EMarinos	IAhmed
PD1-2 r/f	MO'Brien	OGC
EAdensam (EGA1)	BBuckley	ACRS
SBlack		CCowgill, RI

DOCUMENT NAME: G:\PDI-2\Limerick\LTRMA6965.wpd \* see previous  
 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	PDI-2:PM <i>30B</i>	PDI-2:LA	EEIB:SG <i>EM</i>	PDI-2:SC	E		
NAME	BBuckley:pmm	MO'Brien	EMarinos <i>EM</i>	JClifford <i>at</i>			
DATE	01/11/00	01/11/00	01/10/00	01/11/00			

OFFICIAL DOCUMENT COPY

*DF01*

*PDR ADOCK*

**ARC FILE CENTER COP**



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

January 12, 2000

Mr. James A. Hutton  
Director-Licensing, MC 62A-1  
PECO Energy Company  
Nuclear Group Headquarters  
Correspondence Control Desk  
P.O. Box No. 195  
Wayne, PA 19087-0195

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION - DIGITAL POWER RANGE  
NEUTRON MONITORING SYSTEM, LIMERICK 1 AND 2 (TAC NOS. MA6965  
AND MA6966)

Dear Mr. Hutton:

By letter dated October 14, 1999, you submitted a request for a license amendment to revise the Limerick Generating Station, Units 1 and 2, Technical Specifications (TSs). The proposed revisions are necessary to support the installation of a digital Power Range Neutron Monitoring (PRNM) System to replace the existing PRNM system. Based on our review of your submittal, we find that additional information, as delineated in the enclosure, is required to continue our evaluation. On Friday, December 17, 1999, we discussed the additional information being requested with your staff and a 30-day response from the date of receipt of this letter was mutually agreeable.

Sincerely,

*Bartholomew C. Buckley*

Bartholomew C. Buckley, Sr. Project Manager, Section 2  
Project Directorate I  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Docket Nos. 50-352 and 50-353

cc: See next page

Limerick Generating Station, Units 1 & 2

cc:

J. W. Durham, Sr., Esquire  
Sr. V.P. & General Counsel  
PECO Energy Company  
2301 Market Street  
Philadelphia, PA 19101

Manager-Limerick Licensing, 62A-1  
PECO Energy Company  
965 Chesterbrook Boulevard  
Wayne, PA 19087-5691

Mr. James D. von Suskil, Vice President  
Limerick Generating Station  
Post Office Box 2300  
Sanatoga, PA 19464

Plant Manager  
Limerick Generating Station  
P.O. Box 2300  
Sanatoga, PA 19464

Regional Administrator, Region I  
U.S. Nuclear Regulatory Commission  
475 Allendale Road  
King of Prussia, PA 19406

Senior Resident Inspector  
U.S. Nuclear Regulatory Commission  
Limerick Generating Station  
P.O. Box 596  
Pottstown, PA 19464

Chairman  
Board of Supervisors  
of Limerick Township  
646 West Ridge Pike  
Linfield, PA 19468

Chief-Division of Nuclear Safety  
PA Dept. of Environmental Resources  
P.O. Box 8469  
Harrisburg, PA 17105-8469

Director-Site Engineering  
Limerick Generating Station  
P.O. Box 2300  
Sanatoga, PA 19464

Manager-Experience Assessment  
Limerick Generating Station  
P.O. Box 2300  
Sanatoga, PA 19464

Library  
U.S. Nuclear Regulatory Commission  
Region I  
475 Allendale Road  
King of Prussia, PA 19406

Senior Manager-Operations  
Limerick Generating Station  
P.O. Box 2300  
Sanatoga, PA 19464

Dr. Judith Johnsrud  
National Energy Committee  
Sierra Club  
433 Orlando Avenue  
State College, PA 16803

**REQUEST FOR ADDITIONAL INFORMATION**  
**DIGITAL POWER RANGE NEUTRON MONITORING SYSTEM**  
**LIMERICK GENERATING STATION, UNITS 1 AND 2**  
**PECO ENERGY COMPANY**  
**APPLICATION DATED OCTOBER 14, 1999**

1. Current Technical Specification (TS) 3.3.1, "Reactor Protection System Instrumentation," Limiting Condition for Operation (LCO) Actions a. and b. are applicable to all functional units in Table 3.3.1-1 and are proposed to be replaced by new Actions a, b, c, and d. The new Actions a., b., and d. are applicable to the functional units 2a., 2b., 2c., and 2d. of revised Table 3.3.1-1 and found to be in agreement with Topical Report NEDC-3241P-A. Explain and justify that the new Actions a., b., and c. combined are either equivalent or conservative with respect to the current TS Actions a. and b. when applied to the rest of the functional units in Table 3.3.1-1.
2. In Table 2.2.1-1, the proposed change removed "flow biased" and "high flow clamped" subsets of the average power range monitor (APRM) functional unit, yet the setpoints and allowable values for those subsets are retained. Explain this inconsistency and why the Topical Report (NEDC-3241P-A) nomenclature, which is similar to the current TS nomenclature, was not followed. Also, some of the proposed changes to the setpoints in Tables 2.2.1-1 and 3.3.6-2 are nonconservative with respect to the current TS values (e.g., 116.6% instead of 115%; and 62.8% and 57.8% instead of 62% and 57%, respectively). Explain and justify those changes.
3. The topical report actions for "APRM-Inoperative" and "2-out-of-4 voter" functional units is a "hot shutdown" in 12 hours. The proposed actions in Table 3.3.1-1 are from operating mode (mode 1) to "start-up" within 6 hours and from mode 2 (start-up) to "hot shutdown" within 12 hours. Justify this deviation from the topical report requirement.

Enclosure