March 10, 2000

Template NRR-058

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: LIMERICK GENERATING STATION, UNIT 1, CORRECTION OF AMENDMENT NO. 137 REGARDING CHANGES TO THE ALLOWABLE AS-FOUND MAIN STEAM SAFETY-RELIEF VALVE CODE SAFETY FUNCTION LIFT SETPOINT TOLERANCE (TAC NO. MA8160)

Dear Mr. Hutton:

On November 10, 1999, the U.S. Nuclear Regulatory Commission issued Amendment No. 137 to Facility Operating License No. NPF-39 for Limerick Generating Station, Unit 1 (LGS Unit 1), in response to your application dated January 12, 1999, as supplemented January 29, March 10, and September 20, 1999. In the above cited amendment, we inadvertently issued LGS Unit 2 Technical Specifications (TSs) Bases page B 3/4 4-2 instead of LGS Unit 1 TS Bases page B 3/4 4-2. The correct TS Bases page B 3/4 4-2 is enclosed.

We regret any inconvenience this may have caused. If you have any questions regarding this matter, please call me at 301-415-1483.

Sincerely,

/RA/

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

Docket No. 50-352

Enclosure:

cc w/encl: See next page

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UNITED STATES NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

March 10, 2000

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Bortholomew C. Buckley

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

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Docket No. 50-352

Enclosure: TS Bases page B 3/4 4-2, LGS Unit 1

cc w/encl: See next page

Limerick Generating Station, Unit 1

cc:

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REACTOR COOLANT SYSTEM

BASES

<u>RECIRCULATION SYSTEM</u> (Continued)

Plant specific calculations can be performed to determine an applicable region for monitoring neutron flux noise levels. In this case the degree of conservatism can be reduced since plant to plant variability would be eliminated. In this case, adequate margin will be assured by monitoring the region which has a decay ratio greater than or equal to 0.8.

Neutron flux noise limits are also established to ensure early detection of limit cycle neutron flux oscillations. BWR cores typically operate with neutron flux noise caused by random boiling and flow noise. Typical neutron flux noise levels of 1-12% of rated power (peak-to-peak) have been reported for the range of low to high recirculation loop flow during both single and dual recirculation loop operation. Neutron flux noise levels which significantly bound these values are considered in the thermal/mechanical design of GE BWR fuel and are found to be of negligible consequence. In addition, stability tests at operating BWRs have demonstrated that when stability related neutron flux limit cycle oscillations occur they result in peak-to-peak neutron flux limit cycles of 5-10 times the typical values. Therefore, actions taken to reduce neutron flux noise levels exceeding three (3) times the typical value are sufficient to ensure early detection of limit cycle neutron flux oscillations.

Typically, neutron flux noise levels show a gradual increase in absolute magnitude as core flow is increased (constant control rod pattern) with two reactor recirculation loops in operation. Therefore, the baseline neutron flux noise level obtained at a specific core flow can be applied over a range of core flows. To maintain a reasonable variation between the low flow and high flow end of the flow range, the range over which a specific baseline is applied should not exceed 20% of rated core flow with two recirculation loops in operation. Data from tests and operating plants indicate that a range of 20% of rated core flow will result in approximately a 50% increase in neutron flux noise level during operation with two recirculation loops. Baseline data should be taken near the maximum rod line at which the majority of operation will occur. However, baseline data taken at lower rod lines (i.e. lower power) will result in a conservative value since the neutron flux noise level is proportional to the power level at a given core flow.

3/4.4.2 SAFETY/RELIEF VALVES

The safety value function of the safety/relief values operates to prevent the reactor coolant system from being pressurized above the Safety Limit of 1325 psig in accordance with the ASME Code. A total of 12 OPERABLE safety/ relief values is required to limit reactor pressure to within ASME III allowable values for the worst case upset transient.

Demonstration of the safety/relief valve lift settings will occur only during shutdown. The safety/relief valves will be removed and either set pressure tested or replaced with spares which have been previously set pressure tested and stored in accordance with manufacturers recommendations in the specified frequency.

LIMERICK - UNIT 1

Corrected by Ltr. dated Amendment No. 137