



PECO Energy Company
Nuclear Group Headquarters
965 Chesterbrook Boulevard
Wayne, PA 19087-5691

July 17, 2000

Docket Nos. 50-352
50-353

License Nos. NPF-39
NPF-85

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555

Subject: Limerick Generating Station, Units 1 and 2
Technical Specifications Change Request No. 99-07-0
Generic Letter 99-02 Charcoal Filter Testing - Supplemental Information

Reference: Letter, J. A. Hutton (PECO) to USNRC dated November 5, 1999

Dear Sir/Madam:

By letter dated November 5, 1999, PECO Energy Company (PECO Energy) submitted Technical Specifications Change Request (TSCR) No. 99-07-0, "Generic Letter 99-02 Charcoal Filter Testing," for Limerick Generating Station (LGS), Units 1 and 2, respectively, to incorporate revised testing and acceptance criteria for the performance of laboratory analysis of safety-related nuclear-grade activated charcoal in the Technical Specifications (TS) in response to Generic Letter (GL) 99-02, "Laboratory Testing of Nuclear-Grade Activated Charcoal," dated June 3, 1999.

PECO Energy is supplementing TSCR 99-07-0 by modifying the proposed TS Surveillance Requirements (SRs) 4.6.5.3.b.2 and 4.6.5.3.c on page 3/4 6-53 for LGS, Units 1 and 2, to specify that the laboratory testing for methyl iodide penetration for the Standby Gas Treatment System (SGTS) be performed at a face velocity of 66 ft/min. Testing is currently performed at this face velocity as described in Section 3/4.6.5 of the current TS Bases; however, this information is being included in the TS SRs at the request of the NRC.

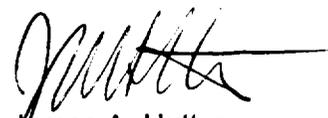
This supplement does not change the information supporting a finding of No Significant Hazards Consideration or the information supporting the need not to perform an Environmental Assessment contained in the referenced letter. The attachment to this letter provides the

ACB1

"camera-ready" TS page 3/4 6-53 for LGS, Units 1 and 2, in support of this request. This information is being submitted under affirmation, and the required affidavit is enclosed.

If you have any questions or require additional information, please do not hesitate to contact us.

Sincerely,



James A. Hutton
Director - Licensing

Enclosure
Attachment

cc: H. J. Miller, Administrator, Region I, USNRC (w/attachment, enclosure)
A. L. Burritt, USNRC Senior Resident Inspector, LGS "
R. R. Janati, PA Bureau of Radiation Protection "

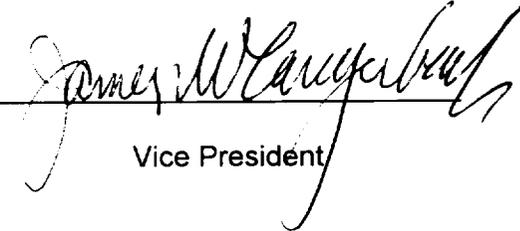
COMMONWEALTH OF PENNSYLVANIA :

: SS

COUNTY OF CHESTER :

J. W. Langenbach, being first duly sworn, deposes and says:

That he is Vice President of PECO Energy Company, the Applicant herein; that he has read the enclosed supplement to Technical Specifications Change Request No. 99-07-0, "Generic Letter 99-02 Charcoal Filter Testing," for Limerick Generating Station, Units 1 and 2, Facility Operating License Nos. NPF-39 and NPF-85, respectively, and knows the contents thereof; and that the statements and matters set forth therein are true and correct to the best of his knowledge, information and belief.


Vice President

Subscribed and sworn to

before me this 17th day

of July, 2000.



Notary Public

Notarial Seal
Vivia V. Gallimore, Notary Public
Tredyffrin Twp., Chester County
My Commission Expires Oct. 6, 2003
Member, Pennsylvania Association of Notaries

ATTACHMENT 1

**LIMERICK GENERATING STATION
UNITS 1 AND 2**

**DOCKET NOS.
50-352
50-353**

**LICENSE NOS.
NPF-39
NPF-85**

**TECHNICAL SPECIFICATIONS CHANGE REQUEST
NO. 99-07-0**

July 17, 2000

"Generic Letter 99-02 Charcoal Filter Testing - Supplemental Information"

**AFFECTED PAGES
(Camera-ready)**

UNIT 1

3/4 6-53

UNIT 2

3/4 6-53

CONTAINMENT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

- b. At least once per 24* months or (1) after any structural maintenance on the HEPA filter or charcoal adsorber housings, or (2) following painting, fire, or chemical release in any ventilation zone communicating with the subsystem by:
1. Verifying that the subsystem satisfies the in-place penetration and bypass leakage testing acceptance criteria of less than 0.05% and uses the test procedure guidance in Regulatory Positions C.5.a, C.5.c and C.5.d of Regulatory Guide 1.52, Revision 2, March 1978, and the system flow rate is 5764 cfm \pm 10%.
 2. Verifying within 31 days after removal that a laboratory analysis of a representative carbon sample obtained in accordance with Regulatory Position C.6.b of Regulatory Guide 1.52, Revision 2, March 1978, shows the methyl iodide penetration of less than 0.5% when tested in accordance with ASTM D3803-1989 at a temperature of 30°C (86°F), at a relative humidity of 70% and at a face velocity of 66 fpm.
 3. Verify that when the fan is running the subsystem flowrate is 2800 cfm minimum from each reactor enclosure (Zones I and II) and 2200 cfm minimum from the refueling area (Zone III) when tested in accordance with ANSI N510-1980.
 4. Verify that the pressure drop across the refueling area to SGTS prefilter is less than 0.25 inches water gage while operating at a flow rate of 2400 cfm \pm 10%.
- c. After every 720 hours of charcoal adsorber operation by verifying within 31 days after removal that a laboratory analysis of a representative carbon sample obtained in accordance with Regulatory Position C.6.b of Regulatory Guide 1.52, Revision 2, March 1978, shows the methyl iodide penetration of less than 0.5% when tested in accordance with ASTM D3803-1989 at a temperature of 30°C (86°F), at a relative humidity of 70% and at a face velocity of 66 fpm.
- d. At least once per 24 months by:
1. Verifying that the pressure drop across the combined HEPA filters and charcoal adsorber banks is less than 9.1 inches water gauge while operating the filter train at a flow rate of 8400 cfm \pm 10%.

*Surveillance interval is an exception to the guidance provided in Regulatory Guide 1.52, Revision 2, March 1978.

CONTAINMENT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

- b. At least once per 24* months or (1) after any structural maintenance on the HEPA filter or charcoal adsorber housings, or (2) following painting, fire, or chemical release in any ventilation zone communicating with the subsystem by:
1. Verifying that the subsystem satisfies the in-place penetration and bypass leakage testing acceptance criteria of less than 0.05% and uses the test procedure guidance in Regulatory Positions C.5.a, C.5.c and C.5.d of Regulatory Guide 1.52, Revision 2, March 1978, and the system flow rate is 5764 cfm \pm 10%.
 2. Verifying within 31 days after removal that a laboratory analysis of a representative carbon sample obtained in accordance with Regulatory Position C.6.b of Regulatory Guide 1.52, Revision 2, March 1978, shows the methyl iodide penetration of less than 0.5% when tested in accordance with ASTM D3803-1989 at a temperature of 30°C (86°F), at a relative humidity of 70% and at a face velocity of 66 fpm.
 3. Verify that when the fan is running the subsystem flowrate is 2800 cfm minimum from each reactor enclosure (Zones I and II) and 2200 cfm minimum from the refueling area (Zone III) when tested in accordance with ANSI N510-1980.
 4. Verify that the pressure drop across the refueling area to SGTS prefilter is less than 0.25 inches water gage while operating at a flow rate of 2400 cfm \pm 10%.
- c. After every 720 hours of charcoal adsorber operation by verifying within 31 days after removal that a laboratory analysis of a representative carbon sample obtained in accordance with Regulatory Position C.6.b of Regulatory Guide 1.52, Revision 2, March 1978, shows the methyl iodide penetration of less than 0.5% when tested in accordance with ASTM D3803-1989 at a temperature of 30°C (86°F), at a relative humidity of 70% and at a face velocity of 66 fpm.
- d. At least once per 24 months by:
1. Verifying that the pressure drop across the combined HEPA filters and charcoal adsorber banks is less than 9.1 inches water gauge while operating the filter train at a flow rate of 8400 cfm \pm 10%.

*Surveillance interval is an exception to the guidance provided in Regulatory Guide 1.52, Revision 2, March 1978.