

September 21, 2000

Mr. James A. Hutton  
Director-Licensing  
PECO Energy Company  
Nuclear Group Headquarters  
Correspondence Control  
P.O. Box 160  
Kennett Square, PA 19348

SUBJECT: LIMERICK GENERATING STATION, UNITS 1 AND 2 - COMPLETION OF LICENSING ACTION FOR GENERIC LETTER 99-02, "LABORATORY TESTING OF NUCLEAR-GRADE ACTIVATED CHARCOAL" (TAC NOS. MA5807 AND MA5808)

Dear Mr. Hutton:

On June 3, 1999, the U.S. Nuclear Regulatory Commission (NRC) issued Generic Letter (GL) 99-02, "Laboratory Testing of Nuclear-Grade Activated Charcoal," to all holders of operating licenses for nuclear power reactors, except those who have permanently ceased operations and have certified that fuel has been permanently removed from the reactor vessel.

The purpose of the GL was to:

- (1) Alert addressees that the NRC has determined that testing Nuclear-grade activated charcoal to standards other than American Society for Testing and Materials (ASTM) D3803-1989, "Standard Test Method for Nuclear-Grade Activated Carbon," does not provide assurance for complying with the current licensing basis as it relates to the dose limits of General Design Criterion (GDC) 19 of Appendix A to Part 50 of Title 10 of the *Code of Federal Regulations* (10 CFR) and Subpart A of 10 CFR Part 100.
- (2) Request that all addressees determine whether their Technical Specifications (TS) reference ASTM D3803-1989 for charcoal filter laboratory testing. Addressees whose TS do not reference ASTM D3803-1989 should either amend their TS to reference ASTM D3803-1989 or propose an alternative test protocol and provide the information discussed in the requested actions.
- (3) Alert addressees to the staff's intent to exercise enforcement discretion under certain conditions.
- (4) Request that all addressees send the NRC written responses on the implementation of the actions requested in this GL.

In GL 99-02, the NRC staff established the following four groups of plants:

- (1) plants in compliance with their TS that test in accordance with ASTM D3803-1989,
- (2) plants in compliance with their TS that test in accordance with a test protocol other than ASTM D3803-1989,
- (3) plants not in compliance with their TS that test in accordance with ASTM D3803-1989, and
- (4) plants not in compliance with their TS that test in accordance with a test protocol other than ASTM D3803-1989.

By letter dated November 17, 1999, you provided the GL 99-02 response for Limerick Generating Station, Units 1 and 2. On November 5, 1999, you also submitted a request for a license amendment to change your TS to provide for testing as described in the GL. By letter dated July 17, 2000, you provided supplemental information for your license amendment request. The NRC staff has reviewed your response and has concluded that you have provided the requested information and a TS change request in accordance with the GL. In addition, you have committed to test in accordance with ASTM D3803-1989 until your TS amendment is issued. Therefore, we consider GL 99-02 to be closed for your facility. The TS change will be reviewed as a separate, plant-specific action under TAC Nos. MA7053 and MA7054. We thank you for your prompt and complete response.

If you have any questions regarding this matter, please contact me at 301-415-1373.

Sincerely,

*/RA/*

Bartholomew C. Buckley, Senior 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

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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 190875691

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