



PECO NUCLEAR

A Unit of PECO Energy

PECO Energy Company
200 Exelon Way
Kennett Square, PA 19348

August 24, 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. 99-04-0
Relocation of the Primary Containment Isolation Valve Table from
Technical Specifications to the Technical Requirements Manual
Supplemental Information

Reference: Letter from J. A. Hutton (PECO Energy Company) to U.S. Nuclear
Regulatory Commission, Limerick Generating Station, Units 1 and 2,
Technical Specifications Change Request No. 99-04-0, "Relocation of
the Primary Containment Isolation Valve Table from Technical
Specifications to the Technical Requirements Manual," dated December
15, 1999

Dear Sir/Madam:

In the Reference letter, PECO Energy Company (PECO Energy) requested changes to Appendix A of Facility Operating License Nos. NPF-39 and NPF-85 for Limerick Generating Station (LGS), Units 1 and 2, respectively. The proposed changes will revise LGS Technical Specifications (TS) to remove TS Table 3.6.3-1, "Primary Containment Isolation Valves," and references to the table, from TS and relocate the information from the TS table to the Technical Requirements Manual (TRM), a licensee-controlled document, in accordance with Generic Letter 91-08, "Removal of Component Lists from Technical Specifications."

The purpose of this letter is to supplement the Reference letter by submitting a revised TS page 3/4 6-18 for both LGS, Units 1 and 2, based on a teleconference between members of the NRC and PECO Energy on August 21, 2000. During the teleconference, the NRC indicated that TS Table 3.6.3-1 Note 27, which exempts the

A001

reactor vessel head seal leak detection line excess flow check valve from the testing requirements of TS Surveillance Requirement (SR) 4.6.3.4, would no longer be valid once the table and associated notes were removed from TS in accordance with the proposed TS change. Therefore, this excess flow check valve would be required to be tested under the proposed TS SR 4.6.3.4 unless specifically exempted in the TS.

Accordingly, the proposed TS SR 4.6.3.4 for LGS, Units 1 and 2, is being revised to add a footnote regarding the exemption from this testing requirement for the identified valve. Attachment 1 to this letter provides the revised "camera-ready" TS page 3/4 6-18 for LGS, Units 1 and 2, respectively. The attached information is being submitted under affirmation, and the required affidavit is enclosed. This supplement does not change the information supporting the finding of No Significant Hazards Consideration and information supporting the need not to perform an Environmental Assessment contained in the Reference letter.

If you have any questions, please do not hesitate to contact us.

Sincerely,



James A. Hutton
Director - Licensing

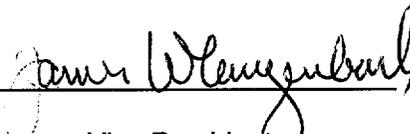
Attachment

cc:	H. J. Miller, Administrator, Region I, USNRC	w/ Attachment
	A. L. Burritt, USNRC Senior Resident Inspector, LGS	"
	R. R. Janati, PA Bureau of Radiological 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. 99-04-0, "Relocation of the Primary Containment Isolation Valve Table from Technical Specifications to the Technical Requirements Manual," 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 24th day
of August, 2000.


Notary Public

Notarial Seal
Carol A. Walton, Notary Public
Tredyffrin Twp., Chester County
My Commission Expires May 28, 2002
Member, Pennsylvania Association of Notaries



ATTACHMENT 1

**LIMERICK GENERATING STATION
UNITS 1 and 2**

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

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

**TECHNICAL SPECIFICATIONS CHANGE REQUEST
NO. 99-04-0
Supplemental Information**

August 24, 2000

**AFFECTED PAGES
(Camera-ready)**

UNIT 1

3/4 6-18

UNIT 2

3/4 6-18

CONTAINMENT SYSTEMS

SURVEILLANCE REQUIREMENTS

4.6.3.1 Each primary containment isolation valve shall be demonstrated OPERABLE prior to returning the valve to service after maintenance, repair or replacement work is performed on the valve or its associated actuator, control or power circuit by cycling the valve through at least one complete cycle of full travel and verifying the specified isolation time.

4.6.3.2 Each primary containment automatic isolation valve shall be demonstrated OPERABLE at least once per 24 months by verifying that on a containment isolation test signal each automatic isolation valve actuates to its isolation position.

4.6.3.3 The isolation time of each primary containment power operated or automatic valve shall be determined to be within its limit when tested pursuant to Specification 4.0.5.

4.6.3.4 Each reactor instrumentation line excess flow check valve shall be demonstrated OPERABLE at least once per 24 months by verifying that the valve checks flow.*

4.6.3.5 Each traversing in-core probe system explosive isolation valve shall be demonstrated OPERABLE:

- a. At least once per 31 days by verifying the continuity of the explosive charge.
- b. At least once per 24 months by removing the explosive squib from the explosive valve, such that each explosive squib in each explosive valve will be tested at least once per 120 months, and initiating the explosive squib. The replacement charge for the exploded squib shall be from the same manufactured batch as the one fired or from another batch which has been certified by having at least one of that batch successfully fired. No squib shall remain in use beyond the expiration of its shelf-life and/or operating life, as applicable.

*The reactor vessel head seal leak detection line (penetration 29A) excess flow check valve is not required to be tested pursuant to this requirement.

CONTAINMENT SYSTEMS

SURVEILLANCE REQUIREMENTS

4.6.3.1 Each primary containment isolation valve shall be demonstrated OPERABLE prior to returning the valve to service after maintenance, repair or replacement work is performed on the valve or its associated actuator, control or power circuit by cycling the valve through at least one complete cycle of full travel and verifying the specified isolation time.

4.6.3.2 Each primary containment automatic isolation valve shall be demonstrated OPERABLE at least once per 24 months by verifying that on a containment isolation test signal each automatic isolation valve actuates to its isolation position.

4.6.3.3 The isolation time of each primary containment power operated or automatic valve shall be determined to be within its limit when tested pursuant to Specification 4.0.5.

4.6.3.4 Each instrumentation line excess flow check valve shall be demonstrated OPERABLE at least once per 24 months by verifying that the valve checks flow.*

4.6.3.5 Each traversing in-core probe system explosive isolation valve shall be demonstrated OPERABLE:

- a. At least once per 31 days by verifying the continuity of the explosive charge.
- b. At least once per 24 months by removing the explosive squib from the explosive valve, such that each explosive squib in each explosive valve will be tested at least once per 120 months, and initiating the explosive squib. The replacement charge for the exploded squib shall be from the same manufactured batch as the one fired or from another batch which has been certified by having at least one of that batch successfully fired. No squib shall remain in use beyond the expiration of its shelf-life and/or operating life, as applicable.

*The reactor vessel head seal leak detection line (penetration 29A) excess flow check valve is not required to be tested pursuant to this requirement.