



PECO NUCLEAR

A Unit of PECO Energy

Nuclear Group Headquarters
200 Exelon Way
Kennett Square, PA 19348

10CFR50.71(e)(4)
10CFR50.54(a)(3)

October 27, 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
Submittal of Revision 10 of the
Updated Final Safety Analysis Report

Dear Sir/Madam:

In accordance with 10CFR50.71(e)(4) and 10CFR50.4(b)(6), this letter submits one (1) original and ten (10) copies of Revision 10 of the Updated Final Safety Analysis Report (UFSAR) for Limerick Generating Station (LGS), Units 1 and 2. The enclosed copies of Revision 10 are being provided to the NRC on a replacement page basis with a list of effective pages identifying the latest revision date of all current pages in accordance with 10CFR50.71(e)(1). In each revision package, we have also provided page replacement instructions for incorporating Revision 10 page changes into the LGS UFSAR. As required by 10CFR50.71(e)(5), each replacement page includes a vertical line in the margin adjacent to each area changed, and the date of change is included on each page. Revision 10 reflects changes made up to a maximum of six months prior to this submittal in accordance with the requirements of 10CFR50.71(e)(4). As a result, the UFSAR Revision 10 package, has been made to reflect changes made to LGS, Units 1 and 2, under the provisions of 10CFR50.59, at least up to May 19, 2000.

The enclosed UFSAR Revision 10 also contains the annual revision of the Quality Assurance Program Description (QAPD) which is being submitted in accordance with 10CFR50.54(a)(3). The updated QAPD (i.e., Section 17.2 of the UFSAR Revision 10) reflects editorial and organizational changes. Attachment 1 provides a listing of those changes which have been made since the previous submittal in accordance with 10CFR50.54(a)(3)(ii). Based on the information provided in Attachment 1, we have concluded that the QAPD changes included in Revision 10 of the UFSAR do not reduce the commitments in the QAPD previously accepted by the NRC.

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As required by 10CFR50.71(e)(2)(i), I certify that to the best of my knowledge, Revision 10 of the UFSAR accurately reflects information and analyses submitted to the NRC, or prepared pursuant to NRC requirements as described above. In addition, as required by 10CFR50.71(e)(2)(ii), Attachment 2 to this letter identifies changes made under the provisions of 10CFR50.59, and included in the enclosed Revision 10, but not previously submitted to the NRC.

If you have any questions or require further information, please contact us.

Very truly yours,

A handwritten signature in black ink, appearing to read "J. H. Miller", with a long horizontal flourish extending to the right.

Enclosure
Attachments

cc: H. J. Miller, Administrator, Region I, USNRC (w/attachments and enclosure)
A. L. Burritt, USNRC Senior Resident Inspector, LGS (w/attachments and enclosure)

ATTACHMENT 1

**PECO Energy Nuclear Group (NG)
Quality Assurance Program Description Changes
LGS UFSAR, Revision 10**

<u>Item No.</u>	<u>Paragraph Number</u>	<u>Description of Change</u>	<u>Change Classification</u>
1.	17.2 17.2.1 17.2.1.1 17.2.1.2 17.2.1.2.4 17.2.1.2.4.1 17.2.1.2.4.1.1 17.2.1.2.4.1.3 17.2.1.2.6.12 17.2.1.2.7 17.2.1.2.7.1 17.2.1.2.8 17.2.1.4 17.2.2.1.5 17.2.2.2 17.2.2.7 17.2.2.8 17.2.3.6.1 17.2.3.8.i 17.2.4.1.a 17.2.4.1.b 17.2.4.1.d 17.2.4.8.1 17.2.4.9 17.2.7.6 17.2.9.2 17.2.9.3 17.2.9.4 17.2.9.4.1 17.2.9.7 17.2.10.4.2 17.2.11.1 17.2.15.2 17.2.15.2.2 17.2.15.8 17.2.15.10 17.2.16.4.3 17.2.17.5 17.2.17.6 17.2.18.1 17.2.18.6 Figure 17.2-1 Figure 17.2-2 Appendix 17.2.I Appendix 17.2.II	Changed "PECO Nuclear" to "PECO Energy Nuclear Group" or "PECO Energy NG" throughout this document to be consistent with nomenclature throughout the LGS UFSAR.	Organizational/ Editorial

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<u>Item No.</u>	<u>Paragraph Number</u>	<u>Description of Change</u>	<u>Change Classification</u>
2.	17.2.1	Description of organization changed to reflect new organizational structure including: Nuclear Group (NG) Headquarters, Regional Operating Group (ROG), and Nuclear Facilities.	Organizational
3.	17.2.1	Revised description to reflect reporting relationship of the Nuclear Group (NG) to PECO Energy Corporate Management.	Organizational
4.	17.2.1.2	Revised description of the Nuclear Group and the Senior Management positions within the new organizational structure including the direct reports to the Chief Nuclear Officer (CNO) which are: Chief Operating Officer (COO), Senior Vice President Nuclear Services, Senior Vice President Technical Support, and Senior Vice President Regional Operating Groups (ROG)	Organizational
5.	17.2.1.2.2	Revised heading to "Offsite Organization" from "Station Support Department" to describe the Nuclear Services and Nuclear Technical Support Departments.	Organizational
6.	17.2.1.2.4 17.2.1.2.4.1 17.2.1.2.4.1.1 17.2.1.2.4.1.1.2 17.2.1.2.4.1.1.3 17.2.1.2.6.1 17.2.1.2.6.10 17.2.1.2.7.1 17.2.2.1.2 17.2.2.1.5 17.2.2.6 17.2.2.8 17.2.2.10 17.2.2.12 17.2.2.16 17.2.5.8 17.2.6.4 17.2.9.9 17.2.10.3.1 17.2.10.4 17.2.10.11 17.2.10.11.1 17.2.14.11	Changed title from Nuclear Quality Assurance (NQA) to Nuclear Oversight (N.O.) throughout the document.	Organizational/ Editorial

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<u>Item No.</u>	<u>Paragraph Number</u>	<u>Description of Change</u>	<u>Change Classification</u>
6. (cont'd)	17.2.16.4 17.2.16.4.1 17.2.16.5 17.2.16.6 17.2.17.9 17.2.18.1 17.2.18.2 17.2.18.4 17.2.18.5 17.2.18.6 17.2.18.7 17.2.18.8 17.2.18.9 17.2.18.10 17.2.18.12 Figure 17.2-2 Figure 17.2-4 Appendix 17.2.I Appendix 17.2.II		
7.	17.2.1.2.4	Revised description of the Nuclear Oversight organization to include the position titles and roles and responsibilities of the Vice President Nuclear Oversight, ROG Nuclear Oversight Director, Programs Director, and Employees Concerns Program Investigator.	Organizational
8.	17.2.1.2.4.1	Revised description of the LGS Nuclear Oversight organization to include the following functions with all associated functional elements: Assessment, Independent Technical Review and Quality Verification.	Organizational
9.	17.2.1.2.4.2	Deleted description of the Corporate Nuclear Quality (CNQ) group. In the new organizational structure the functions of this group have been relocated to the Program Director responsibilities.	Organizational

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<u>Item No.</u>	<u>Paragraph Number</u>	<u>Description of Change</u>	<u>Change Classification</u>
10.	17.2.1.2.4.2	The function of performing Vendor Assessments has been transferred from the Corporate Nuclear Quality Group of NQA to the Nuclear Services Department in Supply Management under the Supplier Evaluation Services (SES) Group. This change in the Quality Assurance Program function was evaluated under the provisions of 10CFR50.54 and transferred through the use of a previously approved NRC SER for the relocation of the Vendor Assessment function to the Supply Management group. See LGS QAPD Section 17.2.1.2.7.1.	Functional
11.	17.2.1.2.4.3	The Quality Verification description and all functions have been relocated within the description of the LGS Site Nuclear Oversight organization found in the LGS QAPD Section 17.2.1.2.4.1	Organizational
12.	17.2.1.2.6 17.2.1.2.6.1 17.2.1.2.6.2 17.2.1.2.6.3 17.2.1.2.6.4 17.2.1.2.6.6 17.2.1.2.6.7 17.2.1.2.6.8 17.2.1.2.6.9 17.2.1.2.6.10 17.2.1.2.6.11 17.2.1.2.6.12 17.2.18.6.k Figure 17.2-2	The title of the Nuclear Review Board (NRB) has been revised to Nuclear Safety Review Board (NSRB) throughout the document.	Organizational / Editorial
13.	17.2.1.2.6.5	Table of participants of Nuclear Safety Review Board (NSRB) deleted. Members of the NSRB are still appointed by the CNO and are PECO Energy Senior Management. Description of the members participating in the NSRB can be found Section 17.2.1.2.6.2, 17.2.1.2.6.3 and 17.2.1.2.6.6	Organizational / Editorial

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<u>Item No.</u>	<u>Paragraph Number</u>	<u>Description of Change</u>	<u>Change Classification</u>
14.	17.2.1.2.7	Added description of new organizational unit, Nuclear Services Department which includes elements of the Station Support Department function including: Information Systems, Fuels, Outage Services, Project Management, Decommissioning Projects, Laboratory Services and Supply Management.	Organizational
15.	17.2.1.2.7.1	Added description of the Supply Management group which includes the Supplier Evaluation Services Group who performs Vendor Evaluations to ensure compliance with the requirements of the Quality Assurance Program. This function was previously performed by the Nuclear Oversight group. This change was described in item 10 above.	Organizational
16.	17.2.1.2.8	Added description of new organizational unit, Nuclear Technical Support Department which includes elements of the Station Support Department function including: Engineering, Generation Support, Maintenance/ Work Control, Training and Regulatory Services.	Organizational
17.	17.2.1.3	Revised description of Business Services to detail that this support function to the Nuclear Group (NG) is through a Service Level Agreement	Organizational
18.	17.2.1.4	Revised description to detail that Legal support to the Nuclear Group (NG) is coordinated by the PECO Energy Vice President and General Counsel.	Organizational
19.	17.2.1.4.1	Revised description of Nuclear Security to detail reporting relationship to Senior Vice President Nuclear Services	Organizational

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<u>Item No.</u>	<u>Paragraph Number</u>	<u>Description of Change</u>	<u>Change Classification</u>
20.	17.2.1.2.4.1.c 17.2.2.1.5 17.2.2.10 17.2.2.12 17.2.5.8 17.2.9.9 17.2.10.11 17.2.10.11.1 17.2.14.11 17.2.16.4.1 17.2.16.4.3 17.2.18.2.b 17.2.18.5 17.2.18.7 17.2.18.9 Appendix 17.2-II	Deleted reference to surveillances that were performed in support of the Assessment process. The administrative process of implementing the regulatory required Assessment process has been changed to the Continuous Assessment process. All observations performed in support of the Assessment process are now captured in as an assessment activity and listed in the Continuous Assessment process checklist. Discreet surveillances and associated surveillance reports are no longer performed in the new process. The reference to surveillances performed in support of the internal assessment process have been deleted throughout this document.	Functional
21.	17.2.2.2	Changed reference from Nuclear Engineering Division to Nuclear Technical Support Department.	Organizational
22.	17.2.2.10	Added Supplier Evaluation Services to the description of the training and qualifications of the personnel performing the regulatory required assessment process. The change to Supplier Evaluation Services group performing Vendor Assessments is detailed in item # 10 above.	Organizational / Functional
22.	17.2.7.1	Changed reference from Station Support Department to Nuclear Services and Nuclear Technical Support Department.	Organizational
23.	17.2.7.7	Changed reference from NQA performing Vendor Evaluations to Supplier Evaluation Services (SES). See item #10 above.	Functional
24.	17.2.7.8	Changed NQA to SES. See item # 10 above.	Functional
25.	17.2.9.4.1	Changed title form Corporate Laboratories to Power Labs.	Organizational
26.	17.2.12.4	Changed title form Corporate Laboratories to Power Labs.	Organizational

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<u>Item No.</u>	<u>Paragraph Number</u>	<u>Description of Change</u>	<u>Change Classification</u>
27.	17.2.18.5	Changed titles from "Director NQA" to "Vice President Nuclear Oversight (N.O.)"	Organizational
28.	17.2.18.6.1	Added item #1 to the list of the areas required to be assessed in accordance with the QA Program requirements. This addition is a requirement of implementing the previously approved NRC SER for relocating the performance of Vendor Assessments from Nuclear Oversight to the Supply Management organization.	Functional
29.	17.2.18.5	Changed titles from "Director NQA" to "Vice President Nuclear Oversight (N.O.)"	Organizational
30.	Figure 17.2-1	Revised figure to reflect the current approved organization.	Organizational
31.	Figure 17.2-2	Revised figure to reflect the current approved organization.	Organizational
32.	Figure 17.2-4	Revised figure to reflect the current approved organization.	Organizational

10CFR50.71(e)(2)(ii) requires that revisions to the UFSAR include changes made under the provisions of 10CFR50.59, but not previously submitted to the NRC. Accordingly, the list below identifies those plant modifications and projects included in Revision 10 of the Limerick Generating Station, Units 1 and 2, Updated Final Safety Analysis Report (UFSAR). The list does not represent a complete list of UFSAR change packages incorporated into Revision 10.

<u>Modification Number</u>	<u>Unit Number</u>	<u>Description</u>
P00224	1	Reactor Stability/Power Range Neutron Monitoring System Upgrade for Unit 1 & 2.
P00411	1	Installation of Precoatless Elements & Modify Backwash System on Condensate Filters.
P00413	2	RHR Shutdown Cooling Suction Outboard Isolation Valve to ensure High/Low Pressure Interface Integrity for Fire Safety Shutdown.
P00660	1 & 2	Defective Floor Planking in Auxiliary Equipment Room (8/289).
P00703	1	Changes to the Primary Containment Instrument Gas (PCIG) in the Diesel Generator Corridor.
P00825	1	Noble Metals Chemical Addition (NMCA) Monitoring System Project – Unit 1.
98-00954 Rev. 0	1	Relocate Reactor Water Cleanup Regen Heat Exchanger Channel Relief Valve PSV's.
99-00722 Rev. 1	1	Margin Improvement for PCIV HV-055-1F003.
99-02468 Rev. 0	1	(Late Add 1R08) 49-1F008 Rewire & Hardface Internals.
99-01804 Rev. 0	1	Add a "Y" Strainer to the HPCI Exhaust Drain Pot Drain Line.
99-02469 Rev. 1	1	(Late Add 1R08) 044-1F001 – Rewire Mod.
99-02161 Rev. 0	1	(Late Add 1R08) 52-1F037 Remove Press Lock Pipe & Drill Wedge.
99-01359 Rev. 0	1	Level Switch on HPCI Turbine Drain Pot.
99-01415 Rev. 0	1	Replace Unit 1 SW Valves – Installation Instructions – 1R08.

ATTACHMENT 2

<u>Modification Number</u>	<u>Unit Number</u>	<u>Description</u>
99-01417 Rev. 0	1	(Late Scope Change) EDG ESW Supply Valves – Loop A.
99-01623 Rev. 0	1	Unit 1 Condenser Salinity Tray CIT Abandonment.

