

**PECO NUCLEAR**

A Unit of PECO Energy

Nuclear Group Headquarters
200 Exelon Way
Kennett Square, PA 19348

December 20, 2000

Docket No. 50-353

License No. NPF-85

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

Subject: Limerick Generating Station, Unit 2
Technical Specifications Change Request No. 00-02-2
Changes to Reactor Pressure Vessel Pressure-Temperature Limits
Supplemental Information

References: (1) Letter from J. A. Hutton (PECO Energy Company) to U.S. Nuclear Regulatory Commission, Limerick Generating Station, Unit 2, Technical Specifications Change Request No. 00-02-2, "Changes to Reactor Pressure Vessel Pressure-Temperature Limits," dated November 20, 2000

Dear Sir/Madam:

In the Reference 1 letter, PECO Energy Company (PECO Energy) requested changes to Appendix A of Facility Operating License No. NPF-85 for Limerick Generating Station (LGS), Unit 2. The proposed changes to LGS, Unit 2, Technical Specifications (TS) Figure 3.4.6.1-1, "Minimum Reactor Vessel Metal Temperature vs. Reactor Vessel Pressure," and associated changes to TS Bases Section 3/4.4.6, revise the pressure-temperature (P-T) limits by revising the heatup, cooldown and inservice test limitations for the Unit 2 Reactor Pressure Vessel (RPV) to a maximum of 32 Effective Full Power Years (EFPY).

The purpose of this letter is to request interim approval of the 32 EFPY P-T limits until the end of the next operating cycle (i.e., Cycle 7) for LGS Unit 2, currently scheduled for April 2003. In a teleconference between members of the NRC and PECO Energy on December 6, 2000, the NRC indicated that the neutron fluence used to develop the revised P-T limits did not reflect the guidance contained in Draft Regulatory Guide DG-1053, "Calculational and Dosimetry Methods for Determining Pressure Vessel Neutron Fluence," dated September, 1999, and therefore, the NRC could not support approval of

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the new P-T limits out to 32 EFPY. During subsequent follow-up teleconferences with the NRC, PECO Energy requested interim approval of the P-T limits. Attachment 1 provides the revised "camera-ready" TS page for LGS Unit 2 TS Figure 3.4.6.1-1, "Minimum Reactor Vessel Metal Temperature vs. Reactor Vessel Pressure" which reflects the interim approval request.

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 1 letter.

We request approval of this amendment prior to March 27, 2001, to ensure the validity of the P-T limitations and to support continued operation of LGS, Unit 2. If approved, we request that the changes become effective no later than March 27, 2001.

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

Sincerely,



James A. Hutton
Director - Licensing

Attachment

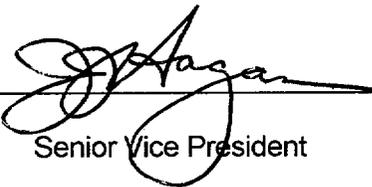
cc:	H. J. Miller, Administrator, Region I, USNRC	w/ Attachment
	A. L. Burritt, USNRC Senior Resident Inspector, LGS	"
	R. R. Janati, PA Bureau of Radiological Protection	w/o Attachment

COMMONWEALTH OF PENNSYLVANIA :
 : SS
COUNTY OF CHESTER :

J. J. Hagan, being first duly sworn, deposes and says:

That he is Senior Vice President of PECO Energy Company, the Applicant herein; that he has read the enclosed supplement to Technical Specifications Change Request No. 00-02-2, "Changes to Reactor Pressure Vessel Pressure-Temperature Limits," for Limerick Generating Station, Unit 2, Facility Operating License No. NPF-85, 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.




Senior Vice President

Subscribed and sworn to
before me this 20th day
of *December*, 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
UNIT 2**

**DOCKET NO.
50-353**

**LICENSE NO.
NPF-85**

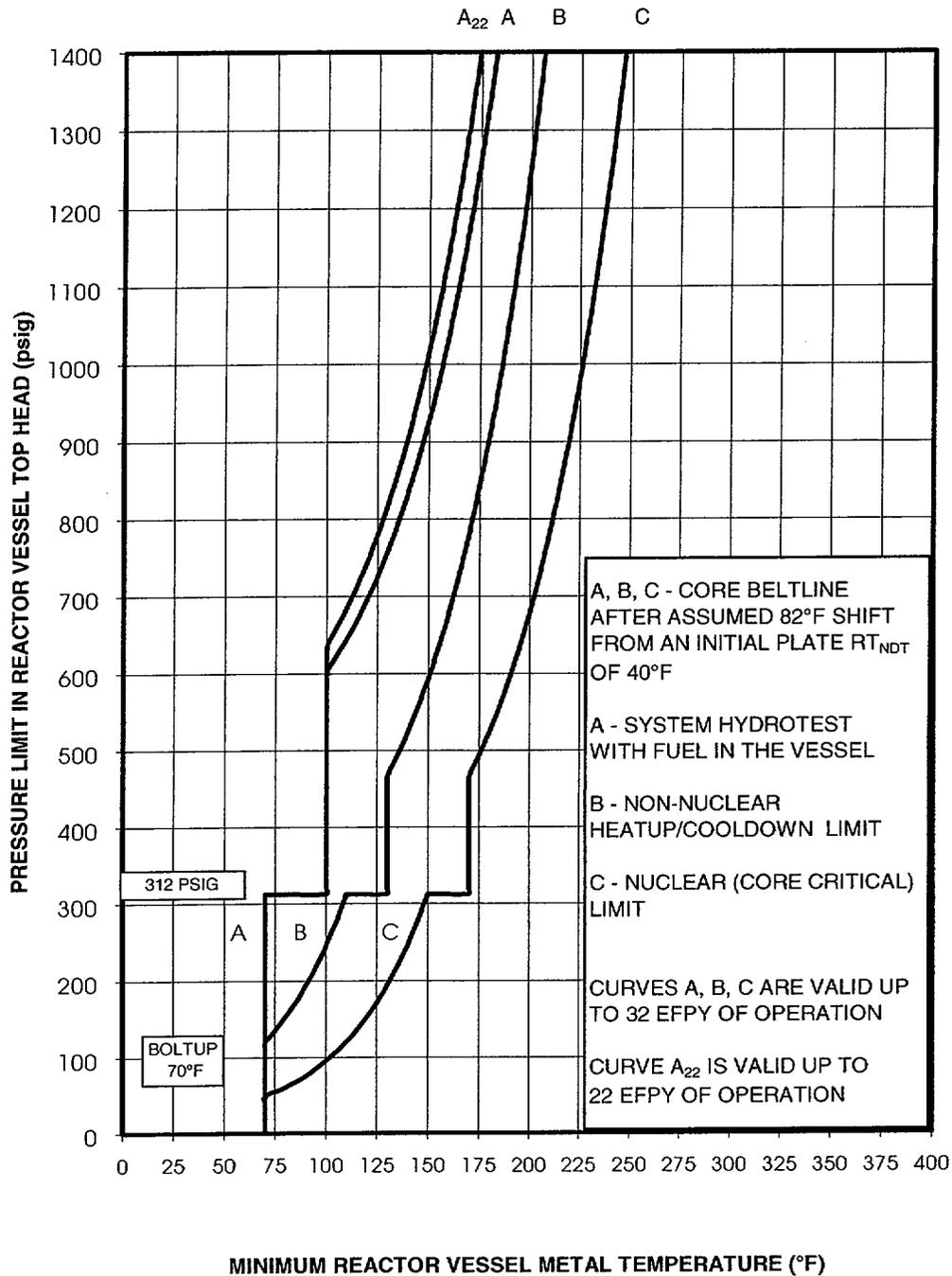
**TECHNICAL SPECIFICATIONS CHANGE REQUEST
NO. 00-02-2**

December 20, 2000

**AFFECTED PAGES
(Camera-ready)**

UNIT 2

3/4 4-20



Note: In accordance with NRC Safety Evaluation supporting Amendment No. _____, this Figure is valid through Cycle 7 Operation, currently scheduled to end in April 2003.

MINIMUM REACTOR VESSEL METAL TEMPERATURE VS. REACTOR VESSEL PRESSURE
FIGURE 3.4.6.1-1