



**PECO NUCLEAR**

A Unit of PECO Energy

Nuclear Group Headquarters  
200 Exelon Way  
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December 18, 2000

Docket Nos. 50-352  
50-353  
50-277  
50-278

License Nos. NPF-39  
NPF-85  
DPR-44  
DPR-56

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

Subject: Limerick Generating Station, Units 1 and 2  
Peach Bottom Atomic Power Station, Units 2 and 3  
10 CFR 50.46 Reporting Requirements

Dear Sir/Madam:

In accordance with 10 CFR 50.46 (a)(3)(i) and (ii), the following is a revision to the licensing basis Loss-of-Coolant Accident (LOCA) peak clad temperatures (PCTs) for Limerick Generating Station (LGS), Units 1 and 2, and Peach Bottom Atomic Power Station (PBAPS), Units 2 and 3. Table 1 (attached) provides the revised licensing basis PCT values and the prior PCT error accumulation changes for LGS, Units 1 and 2. Tables 2 and 3 (attached) provide the revised licensing basis PCT values and the prior PCT error accumulation changes for PBAPS, Units 2 and 3, respectively. Based on the accumulated changes which result in a temperature difference of greater than 50° F from the calculated baseline temperature, this report is being submitted within 30 days.

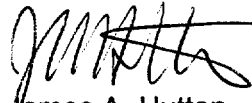
On November 21, 2000, PECO Energy Company received a 10 CFR 50.46 Notification Letter from GE Nuclear Energy ("Impact of SAFER Time Step Size on the Peak Clad Temperature (PCT) for Jet Pump Plant Analyses") in which we were informed of a PCT impact due to a change in the size of the time steps used in the SAFER04V LOCA analysis model. This error impacts the PCTs for all fuel types at LGS, Units 1 and 2, and for all fuel types (except GE14) at PBAPS, Units 2 and 3. The GE14 PCT for PBAPS, Unit 2 was established using the revised time step criteria, and therefore this impact is already accounted for in the baseline PCT for that fuel type. The use of the revised time step criteria results in a decrease in licensing basis PCT of 5° F for the applicable fuel types.

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The attached Tables provide, by fuel type, the baseline PCTs, the prior PCT error accumulations, and the resultant estimated licensing basis PCTs for the limiting and non-limiting fuel types. The estimated licensing basis peak clad temperatures for the most limiting fuel type at LGS, Units 1 and 2 decreases to 1640° F (GE11/13). This represents more than 500° F margin to the 2200° F limit specified in 10 CFR 50.46. The estimated licensing basis peak clad temperature for the most limiting fuel type at PBAPS, Units 2 and 3 decreases to 1790° F (P8x8R). This represents more than 400° F margin to the 2200° F limit specified in 10 CFR 50.46. Additionally, the upper bound peak clad temperature for fuel at both stations remains below the 1600° F limit specified in the USNRC acceptance of the SAFER/GESTR methodology. Therefore, no additional action is required.

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

Very truly yours,



James A. Hutton  
Director - Licensing

Attachments

cc: H. J. Miller, Administrator, Region I, USNRC  
A. L. Burritt, USNRC Senior Resident Inspector, LGS  
A. C. McMurtray, USNRC Senior Resident Inspector, PBAPS

**TABLE 1****CURRENT BASELINE PCT (°F) VALUES AND ERROR ACCUMULATION  
LIMERICK GENERATING STATION, UNITS 1 AND 2**

	P8x8R	GE8	GE9	GE 11/13
BASELINE PCT	1625	1515	1515	1605
Prior PCT Error Accumulation	10	20	50	40
50.46 Notification SAFER Time Steps	-5	-5	-5	-5
TOTAL	5	15	45	35
NEW ESTIMATED LICENSING BASIS PCT VALUES	1630	1530	1560	1640

**TABLE 2****CURRENT BASELINE PCT (°F) VALUES AND ERROR ACCUMULATION  
PEACH BOTTOM ATOMIC POWER STATION, UNIT 2  
(WITH RPT)**

	P8x8R	GE8	GE9	GE 11/13	GE14
<b>BASELINE PCT</b>	1735	1624	1624	1645	1450
<b>Prior PCT Error Accumulation</b>	60	85	115	95	0
<b>50.46 Notification SAFER Time Steps</b>	-5	-5	-5	-5	0
<b>TOTAL</b>	55	80	110	90	0
<b>NEW ESTIMATED LICENSING BASIS PCT VALUES</b>	1790	1704	1734	1735	1450

**TABLE 3****CURRENT BASELINE PCT (°F) VALUES AND ERROR ACCUMULATION  
PEACH BOTTOM ATOMIC POWER STATION, UNIT 3  
(WITH RPT)**

	P8x8R	GE8	GE9	GE 11/13
BASELINE PCT	1735	1624	1624	1645
Prior PCT Error Accumulation	60	85	115	95
50.46 Notification SAFER Time Steps	-5	-5	-5	-5
TOTAL	55	80	110	90
NEW ESTIMATED LICENSING BASIS PCT VALUES	1790	1704	1734	1735