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10 CFR 50.90

January 18, 2001

Docket Nos. 50-352
50-353

License Nos. NPF-39
NPF-85

U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D.C. 20555

Subject: Limerick Generating Station, Units 1 and 2
Technical Specifications Change Request No. 01-02-0

Dear Sir/Madam:

Exelon Generation Company, LLC is submitting Technical Specifications Change Request (TSCR) No. 01-02-0, in accordance with 10 CFR 50.90, requesting an amendment to the TS (Appendix A) of Operating License Nos. NPF-39 and NPF-85 for Limerick Generating Station (LGS), Units 1 and 2. This proposed TSCR is an administrative change which will revise Surveillance Requirement 4.9.2.d.1 to clarify that "shorting links" do not need to be removed if adequate shutdown margin has been demonstrated. Information supporting this TSCR is contained in Attachment 1 to this letter, and the proposed marked up Technical Specification pages and final Technical Specification pages are contained in Attachments 2 and 3, respectively. This information is being submitted under affirmation, and the required affidavit is enclosed. This change is needed to support the upcoming refueling outage for LGS Unit 2. As such, we request your approval of this change on or before April 4, 2001.

There are no commitments contained within this letter. We request that if approved, the changes become effective within 30 days of issuance.

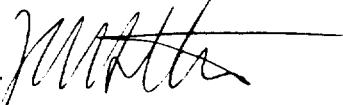
A copy of this TSCR, including the reasoned analysis about a no significant hazards consideration, is being provided to the appropriate Pennsylvania State official in accordance with the requirements of 10 CFR 50.91(b)(1).

A001

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

Very truly yours,



James A. Hutton
Director - Licensing

Attachments; Affidavit

cc: H. J. Miller, Administrator, Region 1, USNRC (w/enc)
A. L. Burritt, USNRC Senior Resident Inspector, LGS "
R. R. Janati, PA Bureau of Radiological Protection "

COMMONWEALTH OF PENNSYLVANIA :

: ss.

COUNTY OF CHESTER :

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

That he is Senior Vice President of Exelon Generation Company, LLC; the Applicant herein; that he has read the attached Technical Specifications (TS) Change Request No. 01-02-0 involving shorting links for Limerick Generating Station Facility Operating Licenses NPF-39 and 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 18th day
of January 2001.


Notary Public

Notarial Seal
Carol A. Walton, Notary Public
Tredyfflin 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
50-353

LICENSE NOS. NPF-39
NPF-85

TECHNICAL SPECIFICATIONS CHANGE REQUEST
NO. 01-02-0

SURVELLANCE REQUIREMENT FOR SHORTING LINKS

Supporting Information for Change - 4 Pages

Introduction

Exelon Generation Company, LLC, Licensee under Facility Operating License Nos. NPF-39 and NPF-85 for Limerick Generating Station (LGS), Units 1 and 2, requests that the Technical Specifications (TS) contained in Appendix A to the Operating Licenses be amended to revise Surveillance Requirement 4.9.2.d.1 to clarify that "shorting links" do not need to be removed if adequate shutdown margin has been demonstrated. The proposed marked up TS pages and final TS pages are contained in Attachments 2 and 3, respectively.

This TS Change Request provides a discussion and description of the proposed TS change, a safety assessment of the proposed TS change, information supporting a finding of No Significant Hazards Consideration, and information supporting an Environmental Assessment.

Discussion and Description of the Proposed Change

This Technical Specifications (TS) Change Request is an administrative change that revises Surveillance Requirement 4.9.2.d.1 to clarify that "shorting links" do not need to be removed if "adequate shutdown margin has been demonstrated" when a control rod is withdrawn. While in Operational Condition 5 (Refueling), Limiting Conditions for Operation (LCO) 3.9.2.d requires that unless adequate shutdown margin has been demonstrated, the "shorting links" shall be removed for the RPS circuitry prior to and during the time any control rod is withdrawn, except when control rods are removed per Specification 3.9.10.1 and 3.9.10.2. "Shorting links" do not need to be removed while in Specification 3.9.10.1 and 3.9.10.2 because these Specifications provide additional controls, such as disarming of all other control rods in the impacted five-by-five array, during Operation Condition 5.

Associated with LCO 3.9.2.d is Surveillance Requirement 4.9.2.d.1. Surveillance Requirement 4.9.2.d.1 requires verification that the RPS "shorting links" have been removed within 8 hours prior to, and at least once per 12 hours during the time any control rod is withdrawn (except when control rods are removed per Specification 3.9.10.1 and 3.9.10.2). Surveillance Requirement 4.9.2.d.1 is being revised to clarify that the verification that the RPS "shorting links" have been removed within 8 hours prior to, and at least once per 12 hours during the time any control rod is withdrawn (except when control rods are removed per Specification 3.9.10.1 and 3.9.10.2), "unless adequate shutdown margin has been demonstrated." This is an administrative change which adds the phrase "unless adequate shutdown margin has been demonstrated" to the Surveillance Requirement. This change will ensure that the words and intent of the Surveillance Requirement (4.9.2.d.1) match the words and intent of the LCO (3.9.2.d). This change to Surveillance Requirement 4.9.2.d.1 will clarify that "shorting links" can remain installed if adequate shutdown margin has been demonstrated any time a control rod is withdrawn in Operational Condition 5.

Safety Assessment

As discussed in Section 7.2 ("Reactor Trip System (Reactor Protection System) - Instrumentation and Controls), the Reactor Protection System (RPS) "includes sensors, relays,

bypass circuitry, and switches that cause the rapid insertion of control rods (scram) to shut down the reactor.” The RPS includes trip signals from the Neutron Monitoring System, which includes the Source Range Monitors and the Intermediate Range Monitors. The Intermediate Range Monitors monitor neutron flux from the upper range of the Source Range Monitors to the lower portion of the Average Power Range Monitors, as shown in LGS Updated Final Safety Analysis Report (UFSAR) Figure 7.6-8. The purpose of the “shorting links” is that during of periods of shutdown margin demonstration testing while in Operation Conditions 4 and 5, and when a control rod is removed and adequate shutdown margin is not demonstrated, “shorting links” must be removed to create a noncoincident reactor Neutron Monitoring System trip, i.e., the RPS trip logic becomes a one-out-of-one trip logic. The RPS trip logic will actuate when any one Source Range Monitor or Intermediate Range Monitor indicates an upscale trip condition. Creating a one-out-of-one logic increases the probability of a reactor trip signal (1/14/93 letter on shutdown margin).

The proposed change is an administrative change which adds the phrase “unless adequate shutdown margin has been demonstrated” to Surveillance Requirement 4.9.2.d.1. This administrative change which will ensure that the words and intent of the Surveillance Requirement (4.9.2.d.1) match the words and intent of the LCO (3.9.2.d), and will improve the readability of the Surveillance Requirement for plant operators. No changes in the operation of the plant during power operation or refueling will occur as a result of this change. No changes in the safety analysis will occur as a result of this change, nor will any changes occur in verification or testing requirements of this Surveillance Requirement.

Information Supporting a Finding of No Significant Hazards Consideration

We have concluded that the change to the Limerick Generating Station (LGS), Units 1 and 2 Technical Specifications (TS), does not involve a Significant Hazards Consideration. In support of this determination, an evaluation of each of the three (3) standards set forth in 10 CFR 50.92 is provided below.

1. The proposed TS change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

This Technical Specifications (TS) Change Request is an administrative change that revises Surveillance Requirement 4.9.2.d.1 to clarify that “shorting links” do not need to be removed if “adequate shutdown margin has been demonstrated “ when a control rod is withdrawn. This administrative change will ensure that the words and intent of the Surveillance Requirement (4.9.2.d.1) match the words and intent of the Limiting Condition for Operation (LCO) (3.9.2.d), and will improve the readability of the Surveillance Requirement for plant operators. This change to Surveillance Requirement 4.9.2.d.1 will clarify that “shorting links” can remain installed if adequate shutdown margin has been demonstrated any time a control rod is withdrawn in Operational Condition 5. This administrative change does not impact any accident or transient events. There are no new initiators created by this change. Additionally, this change will not impact any existing analyses or requirements contained in the Updated Final Safety Analysis Report. No changes in the operation of the plant during

power operation or refueling will occur as a result of this change. Therefore, the proposed TS change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. The proposed TS change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

The proposed Technical Specification change is an administrative change which will not impact any physical changes to plant structures, systems, or components. The design, function, and reliability of the Reactor Protection System will not be impacted by this change. This change does not adversely impact any equipment which is required for the prevention or mitigation of accidents or transients. This administrative change will ensure that the words and intent of the Surveillance Requirement (4.9.2.d.1) match the words and intent of the LCO (3.9.2.d), and will improve the readability of the Surveillance Requirement for plant operators. Therefore, the proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. The proposed TS change does not involve a significant reduction in the margin of safety.

This proposed administrative change to Surveillance Requirement 4.9.2.d.1 does not affect any safety limits or analytical limits. There are also no changes to accident or transient core thermal hydraulic conditions, minimum combustible concentration limits, or fuel or reactor coolant boundary design limits, as a result of this proposed change. This is an administrative change which adds the phrase "unless adequate shutdown margin has been demonstrated" to the Surveillance Requirement. This change will ensure that the words and intent of the Surveillance Requirement (4.9.2.d.1) match the words and intent of the LCO (3.9.2.d). Therefore, the proposed change does not involve a significant reduction in the margin of safety.

Information Supporting an Environmental Assessment

An Environmental Assessment is not required for the change proposed by this TS Change Request because the requested change to the Limerick Generating Station (LGS), Units 1 and 2, TS conforms to the criteria for "actions eligible for categorical exclusion" as specified in 10 CFR 51.22 (c)(9). The requested change will have no impact on the environment. The proposed change does not involve a Significant Hazards Consideration as discussed in the preceding section. The proposed change does not involve a significant change in the types, or a significant increase in the amounts, of any effluents that may be released offsite. In addition, the proposed change does not involve a significant increase in individual or cumulative occupational radiation exposure.

Additionally, in accordance with 10 CFR 51.41, a review was performed to determine the impact of the proposed administrative change to Surveillance Requirement 4.9.2.d.1 on the conclusions of the NRC's Final Environmental Statement for PBAPS. The considerations included in 10 CFR 51.45(b) were used in this review with the following conclusions. Since this

change is administrative only, implementation of the proposed change has no impact on the environment. Since there is no impact on the environment, there are no adverse environmental effects that cannot be avoided. Since this change is administrative only and has no impact on operation of the facility nor on the environment, there is no value in considering alternatives to the proposed change. Since the operation of the facility is not affected by the proposed change, there is no impact on the original assessment of the relationship between local short-term uses of man's environment and the maintenance and enhancement of long-term productivity. Since the operation of the facility is unaffected by the proposed change, there is no change to the commitment of resources and therefore, no irreversible nor irretrievable commitment of resources involved.

Conclusion

We have concluded that the proposed change to the LGS, Units 1 and 2, TS does not involve a Significant Hazards Consideration.

ATTACHMENT 2

LIMERICK GENERATING STATION
UNITS 1 and 2

DOCKET NO. 50-352
50-353

LICENSE NO. NPF-39
NPF-85

TECHNICAL SPECIFICATIONS CHANGE REQUEST
NO. 01-02-0

SURVELLANCE REQUIREMENT FOR SHORTING LINKS

MARKED UP TECHNICAL SPECIFICATION PAGES

UNIT 1
3/4 9-4

UNIT 2
3/4 9-4

REFUELING OPERATIONS

SURVEILLANCE REQUIREMENTS (Continued)

- b. Performance of a CHANNEL FUNCTIONAL TEST at least once per 7 days.
- c. Verifying that the channel count rate is at least 3.0 cps:*
 - 1. Prior to control rod withdrawal,
 - 2. Prior to and at least once per 12 hours during CORE ALTERATIONS, and
 - 3. At least once per 24 hours.
- d. Verifying, within 8 hours prior to and at least once per 12 hours during, that the RPS circuitry "shorting links" have been removed during:
 - 1. The time any control rod is withdrawn** or
 - 2. Shutdown margin demonstrations.

**Refer to PORC
Position # 52**

*unless adequate
shutdown margin has been
demonstrated,*

*May be reduced, provided the source range monitor has an observed count rate and signal-to-noise ratio on or above the curve shown in Figure 3.3.6-1. These channels are not required when sixteen or fewer fuel assemblies, adjacent to the SRMs, are in the core.

**Not required for control rods removed per Specification 3.9.10.1 or 3.9.10.2.

REFUELING OPERATIONS

SURVEILLANCE REQUIREMENTS (Continued)

- b. Performance of a CHANNEL FUNCTIONAL TEST at least once per 7 days.
- c. Verifying that the channel count rate is at least 3.0 cps:*
 - 1. Prior to control rod withdrawal,
 - 2. Prior to and at least once per 12 hours during CORE ALTERATIONS, and
 - 3. At least once per 24 hours.
- d. Verifying, within 8 hours prior to and at least once per 12 hours during, that the RPS circuitry "shorting links" have been removed during:
 - 1. The time any control rod is withdrawn** or
 - 2. Shutdown margin demonstrations.

Refer to PORC
Position # 52

*, unless adequate
shutdown margin has been
demonstrated,*

*May be reduced, provided the source range monitor has an observed count rate and signal-to-noise ratio on or above the curve shown in Figure 3.3.6-1. These channels are not required when sixteen or fewer fuel assemblies, adjacent to the SRMs, are in the core.

**Not required for control rods removed per Specification 3.9.10.1 or 3.9.10.2.

ATTACHMENT 3

LIMERICK GENERATING STATION
UNITS 1 and 2

DOCKET NO. 50-352
50-353

LICENSE NO. NPF-39
NPF-85

TECHNICAL SPECIFICATIONS CHANGE REQUEST
NO. 01-02-0

SURVELLANCE REQUIREMENT FOR SHORTING LINKS

FINAL TECHNICAL SPECIFICATION PAGES

UNIT 1
3/4 9-4

UNIT 2
3/4 9-4

REFUELING OPERATIONS

SURVEILLANCE REQUIREMENTS (Continued)

- b. Performance of a CHANNEL FUNCTIONAL TEST at least once per 7 days.
- c. Verifying that the channel count rate is at least 3.0 cps:*
 - 1. Prior to control rod withdrawal,
 - 2. Prior to and at least once per 12 hours during CORE ALTERATIONS, and
 - 3. At least once per 24 hours.
- d. Verifying, within 8 hours prior to and at least once per 12 hours during, that the RPS circuitry "shorting links" have been removed during:
 - 1. The time any control rod is withdrawn**, unless adequate shutdown margin has been demonstrated, or
 - 2. Shutdown margin demonstrations.

*May be reduced, provided the source range monitor has an observed count rate and signal-to-noise ratio on or above the curve shown in Figure 3.3.6-1. These channels are not required when sixteen or fewer fuel assemblies, adjacent to the SRMs, are in the core.

**Not required for control rods removed per Specification 3.9.10.1 or 3.9.10.2.

REFUELING OPERATIONS

SURVEILLANCE REQUIREMENTS (Continued)

- b. Performance of a CHANNEL FUNCTIONAL TEST at least once per 7 days.
- c. Verifying that the channel count rate is at least 3.0 cps:*
 - 1. Prior to control rod withdrawal,
 - 2. Prior to and at least once per 12 hours during CORE ALTERATIONS, and
 - 3. At least once per 24 hours.
- d. Verifying, within 8 hours prior to and at least once per 12 hours during, that the RPS circuitry "shorting links" have been removed during:
 - 1. The time any control rod is withdrawn**, unless adequate shutdown margin has been demonstrated, or
 - 2. Shutdown margin demonstrations.

*May be reduced, provided the source range monitor has an observed count rate and signal-to-noise ratio on or above the curve shown in Figure 3.3.6-1. These channels are not required when sixteen or fewer fuel assemblies, adjacent to the SRMs, are in the core.

**Not required for control rods removed per Specification 3.9.10.1 or 3.9.10.2.