

10 CFR 50.90

February 20, 2001

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 & 2  
License Change Application ECR 00-01846 (01-01-0) Addendum  
Revision to TS 3.9.1 Applicability

References: 1. Letter from James A. Hutton to the US NRC, dated January 18, 2001  
2. Letter from US NRC to B. Ralph Sylvia, dated May 10, 1993

Dear Sir or Madam:

Exelon Generation Company, LLC (Exelon) hereby submits an addendum to License Change Application (LCA) ECR 00-01846 (Reference 1 above), in accordance with 10 CFR 50.90, requesting changes to the Limerick Generating Station, Units 1 and 2 Facility Operating Licenses.

Reference 1 proposed revisions to the Units 1 and 2 Technical Specifications (TS) Table 1.2, "Operational Conditions," to allow placing the reactor mode switch to the REFUEL position during Operational Conditions 3 and 4 while a control rod is being moved, provided the one-rod-out interlock is operable. The additional change proposed in this letter will expand the Applicability of Units 1 & 2 TS 3.9.1, "Reactor Mode Switch," to include Operational Conditions 3 and 4 when the mode switch is in the REFUEL position. This will provide additional assurance that the one-rod-out interlock is operable when required by expanding the testing requirements to Operational Conditions 3 and 4.

The subject proposed change to TS 3.9.1 does not impact the Information Supporting a Finding of No Significant Hazards Consideration or the Information Supporting an Environmental Assessment as submitted by Reference 1. The subject change simply provides additional assurance that the one-rod-out interlock will be operable when required.

Attachment 1 to this letter provides the "marked-up" and "camera-ready" Technical Specifications pages. 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.

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Revision to TS 3.9.1 Applicability

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The NRC has previously approved the subject change combined with the change proposed by Reference 1 for Nine Mile Point Unit 2 (Reference 2).

There are no commitments contained within this letter.

We request that if approved, the changes become effective within 30 days of issuance.

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

Very truly yours,

A handwritten signature in cursive script that reads "J. A. Hutton / FOR".

James A. Hutton  
Director - Licensing

Enclosures: Affidavit, Attachment 1,

cc: H. J. Miller, Administrator, Region I, USNRC  
A. L. Burritt, USNRC Senior Resident Inspector, LGS  
R. R. Janati, Commonwealth of Pennsylvania

COMMONWEALTH OF PENNSYLVANIA :

: SS.

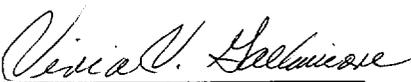
COUNTY OF CHESTER :

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

That he is a Senior Vice President of Exelon Generation Company, LLC; the Applicant herein; that he has read the attached Addendum to License Change Application ECR 00-01846, for Limerick Generating Station 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 *20<sup>th</sup>* day  
of *February* 2001.



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  
UNITS 1 AND 2

Docket Nos. 50-352  
50-353

License Nos. NPF-39  
NPF-85

LICENSE CHANGE APPLICATION  
ECR 00-01846

“Revision to TS 3.9.1 Applicability”

List of Attached Marked Up and Camera-Ready TS Pages

Unit 1  
3/4 9-1

Unit 2  
3/4 9-1

### 3.4.9 REFUELING OPERATIONS

#### 3/4.9.1 REACTOR MODE SWITCH

##### LIMITING CONDITION FOR OPERATION

3.9.1 The reactor mode switch shall be OPERABLE and locked in the Shutdown or Refuel position. When the reactor mode switch is locked in the Refuel position:

- a. The Refuel position one-rod-out interlock shall be OPERABLE.
- b. The following Refuel position interlocks shall be OPERABLE:
  1. All rods in.
  2. Refuel Platform (over-core) position.
  3. Refuel Platform hoists fuel-loaded.
  4. Service Platform hoist fuel-loaded (with Service Platform installed).

APPLICABILITY: OPERATIONAL CONDITION 5\* \*\*<sup>ADD</sup> OPERATIONAL CONDITIONS 3 AND 4

ACTION:

- When the reactor mode switch is in the Refuel position.
- a. With the reactor mode switch not locked in the Shutdown or Refuel position as specified, suspend CORE ALTERATIONS and lock the reactor mode switch in the Shutdown or Refuel position.
  - b. With the one-rod-out interlock inoperable, verify all control rods are fully inserted and disable withdraw capabilities of all control rods \*\*\*, or lock the reactor mode switch in the Shutdown position.
  - c. With any of the above required Refuel Platform Refuel position interlocks inoperable, take one of the ACTIONS listed below, or suspend CORE ALTERATIONS.
    1. Verify control rods are fully inserted and disable withdraw capabilities of all control rods\*\*\*, or
    2. Verify Refuel Platform is not over-core (limit switches not reached) and disable Refuel Platform travel over-core, or
    3. Verify that no Refuel Platform hoist is loaded and disable all Refuel Platform hoists from picking up (grappling) a load.
  - d. With the Service Platform installed over the vessel and any of the above required Service Platform Refuel position interlocks inoperable, take one of the ACTIONS listed below, or suspend CORE ALTERATIONS.
    1. Verify all control rods are fully inserted and disable withdraw capabilities of all control rods\*\*\*, or
    2. Verify Service Platform hoist is not loaded and disable Service Platform hoist from picking up (grappling) a load.

\* See Special Test Exceptions 3.10.1 and 3.10.3.

\*\* The reactor shall be maintained in OPERATIONAL CONDITION 5 whenever fuel is in the reactor vessel with the vessel head closure bolts less than fully tensioned or with the head removed.

\*\*\* Except control rods removed per Specification 3.9.10.1 or 3.9.10.2.

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APPLICABILITY: OPERATIONAL CONDITION 5\* \*\*~~6~~, OPERATIONAL CONDITIONS 3 and 4

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