

10 CFR 50.90

March 26, 2001

Docket Nos. 50-352
50-353License Nos. NPF-39
NPF-85U.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) Second Addendum
Revision to Tables 3.3.1-1 and 4.3.1.1-1 Applicability for IRM Trips

References: 1. Letter from James A. Hutton to the US NRC, dated January 18, 2001
2. Letter from James A. Hutton to the US NRC, dated February 14, 2001

Dear Sir or Madam:

Exelon Generation Company, LLC (Exelon) hereby submits a second addendum to License Change Application (LCA) ECR 00-01846 (Reference 1 and 2 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. Reference 2 proposed changes that would 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 would 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 change will expand the applicability of Tables 3.3.1-1 and 4.3.1.1-1, "Reactor Protection System Instrumentation", to include Operational Conditions 3 & 4 for Intermediate Range Monitors Neutron Flux - High and Inoperative trips. The proposed change to Tables 3.3.1-1 and 4.3.1.1-1 will only be applicable for the condition when the control rod is withdrawn not in accordance with TS 3.9.10.1 and 3.9.10.2.

The subject proposed change to Tables 3.3.1-1 and 4.3.1.1-1 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 Reactor Protection System Instrumentation protection during control rod withdrawal in Operational Conditions 3 and 4.

ADD1

Revision to TS Tables 3.3.1-1 and 4.3.1.1-1 Applicability

March 26, 2001

Page 2

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.

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,



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
J. Boska, Senior Project Manager, USNRC (via FedEx)

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 *23rd* day
of *March* 2001.





Notary Public

Notarial Seal
Carol A. Waiton, Notary Public
Tredyffrin 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

LICENSE CHANGE APPLICATION
ECR 00-01846

“Revision to Tables 3.3.1-1 and 4.3.1.1-1 Applicability for IRM Trips”

List of Attached Marked Up and Camera-Ready TS Pages

<u>Unit 1</u>	<u>Unit 2</u>
3/4 3-2	3/4 3-2
3/4 3-4	3/4 3-4
3/4 3-7	3/4 3-7

TABLE 3.3.1-1 (Continued)

REACTOR PROTECTION SYSTEM INSTRUMENTATIONACTION STATEMENTS

- ACTION 1 - Be in at least HOT SHUTDOWN within 12 hours.
- ACTION 2 - ~~DELETED~~ verify all insertable control rods to be inserted in the core and lock the reactor mode switch in the Shutdown position within 1 hour.
- ACTION 3 - Suspend all operations involving CORE ALTERATIONS and insert all insertable control rods within 1 hour.
- ACTION 4 - Be in at least STARTUP within 6 hours.
- ACTION 5 - Be in STARTUP with the main steam line isolation valves closed within 6 hours or in at least HOT SHUTDOWN within 12 hours.
- ACTION 6 - Initiate a reduction in THERMAL POWER within 15 minutes and reduce turbine first stage pressure until the function is automatically bypassed, within 2 hours.
- ACTION 7 - Verify all insertable control rods to be inserted within 1 hour.
- ACTION 8 - Lock the reactor mode switch in the Shutdown position within 1 hour.
- ACTION 9 - Suspend all operations involving CORE ALTERATIONS, and insert all insertable control rods and lock the reactor mode switch in the SHUTDOWN position within 1 hour.

TABLE 4.3.1.1-1

REACTOR PROTECTION SYSTEM INSTRUMENTATION SURVEILLANCE REQUIREMENTS

<u>FUNCTIONAL UNIT</u>	<u>CHANNEL CHECK</u>	<u>CHANNEL FUNCTIONAL TEST</u>	<u>CHANNEL CALIBRATION(a)</u>	<u>OPERATIONAL CONDITIONS FOR WHICH SURVEILLANCE REQUIRED</u>
1. Intermediate Range Monitors:				
a. Neutron Flux - High	S(b) S	W W(j)	R R	2 3(i), 4(i), 5(i)
b. Inoperative	N.A.	W(j)	N.A.	2, 5(i)
2. Average Power Range Monitor(f):				
a. Neutron Flux - Upscale (Setdown)	D(b)	SA(l)	R	2, 3(i), 4(i)
b. Simulated Thermal Power - Upscale	D	SA(e)	W(d), R(g)	1
c. Neutron Flux - Upscale	D	SA	W(d), R	1
d. Inoperative	N.A.	SA	N.A.	1, 2
e. 2-Out-Of-4 Voter	D	SA	N.A.	1, 2
3. Reactor Vessel Steam Dome Pressure - High	S	Q	R	1, 2(h)
4. Reactor Vessel Water Level - Low, Level 3	S	Q	R	1, 2
5. Main Steam Line Isolation Valve - Closure	N.A.	Q	R	1
6. DELETED	DELETED	DELETED	DELETED	DELETED
7. Drywell Pressure - High	S	Q	R	1, 2
8. Scram Discharge Volume Water Level - High				
a. Level Transmitter	S	Q	R	1, 2, 5(i)
b. Float Switch	N.A.	Q	R	1, 2, 5(i)

LIMERICK - UNIT 1

3/4 3-7

Amendment No. 41, 83, 89, 113, 141

APR 12 2000

LIMERICK - UNIT 2

3/4 3-2

Amendment No. 7, 109

TABLE 3.3.1-1

REACTOR PROTECTION SYSTEM INSTRUMENTATION

<u>FUNCTIONAL UNIT</u>	<u>APPLICABLE OPERATIONAL CONDITIONS</u>	<u>MINIMUM OPERABLE CHANNELS PER TRIP SYSTEM (a)</u>	<u>ACTION</u>
1. Intermediate Range Monitors ^(b) :			
a. Neutron Flux - High	2 3(i), 4(i) 5(i)	3 3 3(d)	1 2 3
b. Inoperative	2 3(i), 4(i) 5(i)	3 3 3(d)	1 2 3
2. Average Power Range Monitor ^(b) :			
a. Neutron Flux - Upscale (Setdown)	2	3(m)	1
b. Simulated Thermal Power - Upscale	1	3(m)	4
c. Neutron Flux - Upscale	1	3(m)	4
d. Inoperative	1, 2	3(m)	1
e. 2-Out-Of-4 Voter	1, 2	2	1
3. Reactor Vessel Steam Dome Pressure - High	1, 2(f)	2	1
4. Reactor Vessel Water Level - Low, Level 3	1, 2	2	1
5. Main Steam Line Isolation Valve-Closure	1(g)	1/valve	4

TABLE 3.3.1-1 (Continued)

REACTOR PROTECTION SYSTEM INSTRUMENTATION

ACTION STATEMENTS

- ACTION 1 - Be in at least HOT SHUTDOWN within 12 hours.
- ACTION 2 - ~~DELETED~~
- ACTION 3 - Suspend all operations involving CORE ALTERATIONS and insert all insertable control rods within 1 hour.
- ACTION 4 - Be in at least STARTUP within 6 hours.
- ACTION 5 - Be in STARTUP with the main steam line isolation valves closed within 6 hours or in at least HOT SHUTDOWN within 12 hours.
- ACTION 6 - Initiate a reduction in THERMAL POWER within 15 minutes and reduce turbine first stage pressure until the function is automatically bypassed, within 2 hours.
- ACTION 7 - Verify all insertable control rods to be inserted within 1 hour.
- ACTION 8 - Lock the reactor mode switch in the Shutdown position within 1 hour.
- ACTION 9 - Suspend all operations involving CORE ALTERATIONS, and insert all insertable control rods and lock the reactor mode switch in the SHUTDOWN position within 1 hour.

Verify all insertable control rods to be inserted in the core and lock the reactor mode switch in the Shutdown position within 1 hour.

TABLE 4.3.1.1-1

REACTOR PROTECTION SYSTEM INSTRUMENTATION SURVEILLANCE REQUIREMENTS

FUNCTIONAL UNIT	CHANNEL CHECK	CHANNEL FUNCTIONAL TEST	CHANNEL CALIBRATION(a)	OPERATIONAL CONDITIONS FOR WHICH SURVEILLANCE REQUIRED
1. Intermediate Range Monitors:				
a. Neutron Flux - High	S(b) S	W W(j)	R R	2 5(i) 3(i), 4(i) 1
b. Inoperative	N.A.	W(j)	N.A.	2, 5(i) 3(i), 4(i)
2. Average Power Range Monitor(f):				
a. Neutron Flux - Upscale (Setdown)	D(b)	SA(1)	R	2
b. Simulated Thermal Power - Upscale	D	SA(e)	W(d), R(g)	1
c. Neutron Flux - Upscale	D	SA	W(d), R	1
d. Inoperative	N.A.	SA	N.A.	1, 2
e. 2-Out-Of-4 Voter	D	SA	N.A.	1, 2
3. Reactor Vessel Steam Dome Pressure - High	S	Q	R	1, 2(h)
4. Reactor Vessel Water Level - Low, Level 3	S	Q	R	1, 2
5. Main Steam Line Isolation Valve - Closure	N.A.	Q	R	1
6. DELETED	DELETED	DELETED	DELETED	DELETED
7. Drywell Pressure - High	S	Q	R	1, 2
8. Scram Discharge Volume Water Level - High				
a. Level Transmitter	S	Q	R	1, 2, 5(i)
b. Float Switch	N.A.	Q	R	1, 2, 5(i)

3/4 3-7

Amendment No. 52, 75, 109

TABLE 3.3.1-1

REACTOR PROTECTION SYSTEM INSTRUMENTATION

<u>FUNCTIONAL UNIT</u>	<u>APPLICABLE OPERATIONAL CONDITIONS</u>	<u>MINIMUM OPERABLE CHANNELS PER TRIP SYSTEM (a)</u>	<u>ACTION</u>
1. Intermediate Range Monitors ^(b) :			
a. Neutron Flux - High	2 3(i), 4(i) 5(i)	3 3 3(d)	1 2 3
b. Inoperative	2 3(i), 4(i) 5(i)	3 3 3(d)	1 2 3
2. Average Power Range Monitor ^(e) :			
a. Neutron Flux - Upscale (Setdown)	2	3(m)	1
b. Simulated Thermal Power - Upscale	1	3(m)	4
c. Neutron Flux - Upscale	1	3(m)	4
d. Inoperative	1, 2	3(m)	1
e. 2-Out-Of-4 Voter	1, 2	2	1
3. Reactor Vessel Steam Dome Pressure - High	1, 2(f)	2	1
4. Reactor Vessel Water Level - Low, Level 3	1, 2	2	1
5. Main Steam Line Isolation Valve-Closure	1(g)	1/valve	4

TABLE 3.3.1-1 (Continued)

REACTOR PROTECTION SYSTEM INSTRUMENTATION

ACTION STATEMENTS

- ACTION 1 - Be in at least HOT SHUTDOWN within 12 hours.
- ACTION 2 - Verify all insertable control rods to be inserted in the core and lock the reactor mode switch in the SHUTDOWN position within 1 hour.
- ACTION 3 - Suspend all operations involving CORE ALTERATIONS and insert all insertable control rods within 1 hour.
- ACTION 4 - Be in at least STARTUP within 6 hours.
- ACTION 5 - Be in STARTUP with the main steam line isolation valves closed within 6 hours or in at least HOT SHUTDOWN within 12 hours.
- ACTION 6 - Initiate a reduction in THERMAL POWER within 15 minutes and reduce turbine first stage pressure until the function is automatically bypassed, within 2 hours.
- ACTION 7 - Verify all insertable control rods to be inserted within 1 hour.
- ACTION 8 - Lock the reactor mode switch in the Shutdown position within 1 hour.
- ACTION 9 - Suspend all operations involving CORE ALTERATIONS, and insert all insertable control rods and lock the reactor mode switch in the SHUTDOWN position within 1 hour.

TABLE 4.3.1.1-1

REACTOR PROTECTION SYSTEM INSTRUMENTATION SURVEILLANCE REQUIREMENTS

<u>FUNCTIONAL UNIT</u>	<u>CHANNEL CHECK</u>	<u>CHANNEL FUNCTIONAL TEST</u>	<u>CHANNEL CALIBRATION(a)</u>	<u>OPERATIONAL CONDITIONS FOR WHICH SURVEILLANCE REQUIRED</u>
1. Intermediate Range Monitors:				
a. Neutron Flux - High	S(b) S	W W(j)	R R	2 3(i), 4(i), 5(i)
b. Inoperative	N.A.	W(j)	N.A.	2, 3(i), 4(i), 5(i)
2. Average Power Range Monitor(f):				
a. Neutron Flux - Upscale (Setdown)	D(b)	SA(l)	R	2
b. Simulated Thermal Power - Upscale	D	SA(e)	W(d), R(g)	1
c. Neutron Flux - Upscale	D	SA	W(d), R	1
d. Inoperative	N.A.	SA	N.A.	1, 2
e. 2-Out-Of-4 Voter	D	SA	N.A.	1, 2
3. Reactor Vessel Steam Dome Pressure - High	S	Q	R	1, 2(h)
4. Reactor Vessel Water Level - Low, Level 3	S	Q	R	1, 2
5. Main Steam Line Isolation Valve - Closure	N.A.	Q	R	1
6. DELETED	DELETED	DELETED	DELETED	DELETED
7. Drywell Pressure - High	S	Q	R	1, 2
8. Scram Discharge Volume Water Level - High				
a. Level Transmitter	S	Q	R	1, 2, 5(i)
b. Float Switch	N.A.	Q	R	1, 2, 5(i)

TABLE 3.3.1-1

REACTOR PROTECTION SYSTEM INSTRUMENTATION

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a. Neutron Flux - High	2 3(i), 4(i) 5(i)	3 3 3(d)	1 2 3
b. Inoperative	2 3(i), 4(i) 5(i)	3 3 3(d)	1 2 3
2. Average Power Range Monitor ^(e) :			
a. Neutron Flux - Upscale (Setdown)	2	3(m)	1
b. Simulated Thermal Power - Upscale	1	3(m)	4
c. Neutron Flux - Upscale	1	3(m)	4
d. Inoperative	1, 2	3(m)	1
e. 2-Out-Of-4 Voter	1, 2	2	1
3. Reactor Vessel Steam Dome Pressure - High	1, 2(f)	2	1
4. Reactor Vessel Water Level - Low, Level 3	1, 2	2	1
5. Main Steam Line Isolation Valve-Closure	1(g)	1/valve	4

TABLE 3.3.1-1 (Continued)

REACTOR PROTECTION SYSTEM INSTRUMENTATION

ACTION STATEMENTS

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TABLE 4.3.1.1-1

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1. Intermediate Range Monitors:				
a. Neutron Flux - High	S(b) S	W W(j)	R R	2 3(i), 4(i), 5(i)
b. Inoperative	N.A.	W(j)	N.A.	2, 3(i), 4(i), 5(i)
2. Average Power Range Monitor(f):				
a. Neutron Flux - Upscale (Setdown)	D(b)	SA(l)	R	2
b. Simulated Thermal Power - Upscale	D	SA(e)	W(d), R(g)	1
c. Neutron Flux - Upscale	D	SA	W(d), R	1
d. Inoperative	N.A.	SA	N.A.	1, 2
e. 2-Out-Of-4 Voter	D	SA	N.A.	1, 2
3. Reactor Vessel Steam Dome Pressure - High	S	Q	R	1, 2(h)
4. Reactor Vessel Water Level - Low, Level 3	S	Q	R	1, 2
5. Main Steam Line Isolation Valve - Closure	N.A.	Q	R	1
6. DELETED	DELETED	DELETED	DELETED	DELETED
7. Drywell Pressure - High	S	Q	R	1, 2
8. Scram Discharge Volume Water Level - High				
a. Level Transmitter	S	Q	R	1, 2, 5(i)
b. Float Switch	N.A.	Q	R	1, 2, 5(i)