

Docket No. 50-352

**MAR 3 1986**

Mr. Edward G. Bauer, Jr.  
Vice President and General Counsel  
Philadelphia Electric Company  
2301 Market Street  
Philadelphia, Pennsylvania 19101

Dear Mr. Bauer:

SUBJECT: ISSUANCE OF AN EXEMPTION FOR FACILITY OPERATING LICENSE NO. NPF-39,  
LIMERICK GENERATING STATION, UNIT 1

The U.S. Nuclear Regulatory Commission has issued the enclosed one-time exemption from the requirements of Appendix J, 10 CFR Part 50 for Facility Operating License No. NPF-39 for the Limerick Generating Station, Unit 1 located in Montgomery County, Pennsylvania. This exemption deals with an extension in the schedule for conducting leak rate tests on certain containment isolation valves.

The Philadelphia Electric Company requested this exemption in its letter dated December 18, 1985. The staff has found that approval of the extension in the schedule for testing the subject isolation valves requires the granting of the above identified exemption. The related amendment to the Unit 1 Technical Specifications is being issued separately.

A copy of the related safety evaluation supporting the exemption is enclosed. Also enclosed is a copy of a related notice of environmental assessment and finding of no significant impact which was published in the Federal Register.

A copy of the exemption is being filed with the Office of the Federal Register.

Sincerely,

*Original signed by:*

8603130028 860303  
PDR ADOCK 05000352  
P PDR

Walter R. Butler, Director  
BWR Project Directorate No. 4  
Division of BWR Licensing

Enclosures:

1. Exemption
2. Safety Evaluation
3. Notice of Environmental Assessment

cc: See next page

\*Previously concurred:

PD#4/PM	PD#4/LA
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2/14/86	2/ /86

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UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

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Vice President and General Counsel  
Philadelphia Electric Company  
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Sincerely,

A handwritten signature in cursive script that reads "Walter R. Butler".

Walter R. Butler, Director  
BWR Project Directorate No. 4  
Division of BWR Licensing

Enclosures:

1. Exemption
2. Safety Evaluation
3. Notice of Environmental Assessment

cc: See next page

Mr. Edward G. Bauer, Jr  
Philadelphia Electric Company

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Units 1 & 2

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- 2 -

Limerick Generating Station 1/2

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UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

In the Matter of  
Philadelphia Electric Company  
  
Limerick Generating Station  
Unit 1

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Docket No. 50-352

EXEMPTION

I

The Philadelphia Electric Company (PECo./the licensee) is the holder of Facility Operating License No. NPF-39 which authorizes operation of the Limerick Generating Station, Unit 1 at a power level not in excess of 3293 megawatts thermal for each unit. The facility is a boiling water reactor located at the licensee's site in Montgomery County, Pennsylvania. The license provides, among other things, that the facility is subject to all rules, regulations and orders of the Commission now or hereafter in effect.

II

Paragraphs III.C.3 and III.D.3 of Appendix J to 10 CFR Part 50 require that containment isolation valves which may provide a pathway for leakage of containment atmosphere are required, on at least a 24 month frequency, to have their leakage measured for comparison with the limiting value of 0.6 L<sub>a</sub> for Type B and Type C tests.

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PDR ADOCK 05000352  
P PDR

The Philadelphia Electric Company proposed a one-time extension to the Surveillance Requirements for Technical Specification 4.6.1.2 which would allow the 24 month interval for conducting Type C tests with gas on 27 isolation valves to be extended by 12 weeks until May 26, 1986. The staff has found that approval of the proposed extension is warranted and is authorized by the granting of this one-time exemption so that Unit 1 may continue to operate until a shutdown is required on May 26, 1986 to perform other extensive surveillance and maintenance activities.

### III

The NRC staff has evaluated the licensee's basis for requesting the extension in the surveillance interval and finds that not granting this exemption would require the licensee to shut down the plant on March 3, 1986 for a period of about two weeks to conduct the testing. Granting of this exemption is likely to result in a negligible reduction in containment integrity during the 12 week extension period. In evaluating the changes to the Technical Specifications and the associated exemption, the staff reviewed the licensee's technical justifications for the requested extension. The staff reviewed the licensee's position that these tests cannot be conducted during power operations and that therefore a shutdown would be required to perform the tests. The staff reviewed the types of valves involved to ascertain that these are not the types of valves used in boiling water reactors which have a greater propensity to require intensive maintenance to maintain their leaktight integrity. The staff considered the uses

of these valves to ascertain that they are not used during normal plant operations in the relatively more demanding applications such as modulating valves to continuously control flow rates or pressure. The staff reviewed available data provided by the licensee on similar valves used elsewhere in the industry which supports the licensee's position that these valves have traditionally good maintenance histories in the industry. The staff also reviewed previous leakage test results on the specific valves subject to the exemption request and has found that there is substantial margin between the values previously measured and the limiting values in Appendix J and the Technical Specifications to accommodate any additional degradation likely to occur during the period of the extension. The details of the above described review are discussed in the attached Safety Evaluation. Based on the information provided by the licensee, the staff's evaluation of the licensee's submittals, the NRC staff concludes that the licensee has provided an adequate basis for the conclusion that postponing the subject local leak rate tests until May 26, 1986 is likely to have little or no effect on containment integrity.

The Commission has amended its regulations, effective on January 13, 1986, in 10 CFR 50.12 (50 FR50764-50778) to modify the criteria for granting exemptions from its regulations. The amended regulations in 10 CFR 50.12 state that the Commission will not consider granting an exemption unless special circumstances are present. In its letter of February 25, 1986 the licensee has addressed two of those special circumstances which are applicable to this exemption request.



The licensee states that the special circumstances of 10 CFR 50.12 (a)(2)(ii) are present in that application of the regulation in 10 CFR 50, Appendix J for the Type C leakage testing of 27 containment isolation valves within 24 months, i.e. by March 3, 1986, of their initial tests versus the requested one-time extension until May 26, 1986 is not necessary to achieve the underlying purpose of the rule. Appendix J states that a purpose of the tests is to assure that leakage through the primary reactor containment and systems and components penetrating primary containment shall not exceed allowable leakage rate values as specified in the technical specifications or associated bases.

The licensee has provided various bases for its conclusion that the requested delay of 12 weeks is not likely to result in a situation wherein the measured leakage from these valves would cause the limitations of the technical specifications to be exceeded. These bases, which are discussed in more detail in the enclosed Safety Evaluation and the licensee's submittals, include the licensee's characterization of these valves as being of the type which traditionally have good maintenance histories, are not used in the relatively more demanding applications and which have shown in their initial leakage tests that they do not contribute an undue proportion of either the total measured containment leakage or the technical specification allowable leakage values. On these bases the staff agrees that it is unlikely that the delay in the testing of the subject 27 valves would result in measured leakage that would cause the allowable technical specification values to be exceeded. Thus the NRC staff concludes that the underlying purpose of Appendix J in this regard,

to provide assurance that leakage shall not exceed technical specification allowable values, will be met with this one-time extension of the test schedule.

The licensee also states that the special circumstances of 10 CFR 50.12 (a) (2)(v) are present in that the exemption would provide only temporary relief from the applicable regulation and the licensee has made good faith efforts to comply with the regulation.

The exemption is temporary since it provides relief from the requirement to conduct the subject tests only from March 3, 1986 until during a shutdown which shall begin no later than May 26, 1986. The licensee submits that it has made a good faith effort to comply with the requirements of the regulation in that it has tested all but 27 valves out of a total population of over 200 valves subject to such testing by the date initially required by Appendix J and the technical specifications. The licensee also describes its attempts to minimize the number of valves which would require the schedular relief by proceeding with the tests of all valves necessary to permit operations until May 26, 1986 which could be tested without requiring the shutdown of the plant. This effort was undertaken following the delay between the completion of low power testing activities and issuance of the full power license. Thus the NRC staff concludes that the requested exemption meets the criterion of providing only temporary relief and has been accompanied by a good faith effort to comply with the regulation.

Based upon the staff's findings that postponing the local leak rate tests from March 3 until May 26, 1986 is likely to have little or no effect on containment integrity and the staff's assessment of the special circumstances associated with this request for an exemption the NRC staff finds that operation of Limerick Unit 1 during the proposed extension period is acceptable. Therefore, the staff finds that the proposed temporary exemption from 10 CFR 50, Appendix J, Paragraph III.D.3 is acceptable.

#### IV

Accordingly, the Commission has determined that, pursuant to 10 CFR 50.12, the exemption is authorized by law, will not endanger life or property or the common defense and security and is otherwise in the public interest. Therefore, the Commission hereby grants the exemption as follows:

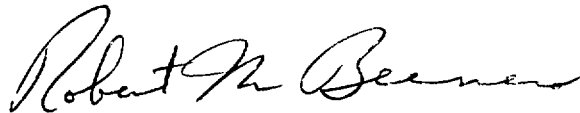
"An exemption is granted from the requirement to conduct Type C testing on containment isolation valves at an interval no greater than 24 months as stated in 10 CFR 50, Appendix J, Paragraph III.D.3. This exemption is granted for the period specified in the licensee's December 18, 1985 request for exemption (from March 3, 1986 until May 26, 1986) and is only applicable to 27 valves in Limerick Unit 1 as indicated in the modified Technical Specification Table 3.6.3-1 accompanying the issuance of Amendment No. 2 to License No. NPF-39."

Pursuant to 10 CFR 51.32, the Commission has determined that the issuance of the exemption will have no significant impact on the environment (51FR7344, March 3, 1986).

A copy of the Commission's Safety Evaluation dated March 3, 1986 related to this action is available for public inspection at the Commission's Public Document Room, 1717 H Street, N.W., Washington, DC and the Pottstown Public Library, 500 High Street, Pottstown, Pennsylvania 19464.

This Exemption is effective upon issuance and is to expire at midnight on May 26, 1986.

FOR THE NUCLEAR REGULATORY COMMISSION

A handwritten signature in cursive script, appearing to read "Robert M. Bernero".

Robert Bernero, Director  
Division of BWR Licensing

Dated at Bethesda, Maryland  
this 3rd day of March 1986

A copy of the Commission's Safety Evaluation dated March 3, 1986 related to this action is available for public inspection at the Commission's Public Document Room, 1717 H Street, N.W., Washington, DC and the Pottstown Public Library, 500 High Street, Pottstown, Pennsylvania 19464.

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FOR THE NUCLEAR REGULATORY COMMISSION

Original signed by:

Robert Bernero, Director  
Division of BWR Licensing

Dated at Bethesda, Maryland  
this 3rd day of <sup>March</sup>~~February~~ 1986

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SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION  
SUPPORT EXEMPTION FROM APPENDIX J FACILITY OPERATING LICENSE NO. NPF-39

PHILADELPHIA ELECTRIC COMPANY

MONTGOMERY COUNTY, PENNSYLVANIA

LIMERICK GENERATING STATION, UNIT NO. 1

DOCKET NO. 50-352

1.0 Introduction

By letter dated December 18, 1985, the Philadelphia Electric Company (the licensee) requested a one-time-only approval to temporarily extend certain surveillance requirements in the Technical Specifications, which must be performed nominally every 24 months and which can only be done when the plant is shutdown. The change would extend the 24 month surveillance intervals for leakage testing of selected containment isolation valves by up to 12 weeks beyond the time allowed by the Technical Specifications. This would permit the licensee to delay performing this testing until a maintenance and surveillance outage which will begin on or before May 26, 1986. The staff has found that approval of the proposed change to the Technical Specification would also require the granting of an exemption from Appendix J along with the issuance of the requested amendment.

By letters dated January 29, February 5, February 25 and March 3, 1986 the licensee provided additional information in support of the proposed changes. Technical Specification (TS) 4.6.1.2.d requires that Type C tests shall be conducted at intervals no greater than 24 months except for tests involving valves in hydrostatically tested lines. The 24 month interval for this Type C testing is consistent with the requirements of 10 CFR Part 50, Appendix J, paragraph III.D.3 which specifies that Type C tests shall be performed at intervals no greater than 2 years. The licensee's letter of December 18, 1985 requested an extension of the 24 month TS testing requirement by a maximum of 12 weeks for a group of 27 isolation valves. In addition, in the December 18, 1985 letter the licensee requested a one-time exemption from the Appendix J 24 month testing requirements for these 27 valves.

Paragraphs III.C.3 and III.D.3 of Appendix J require that containment isolation valves which may provide a pathway for leakage of containment atmosphere are required, on at least a 24 month frequency, to have their leakage measured for comparison with the limiting value of 0.6 L<sub>a</sub> for Type B and Type C tests. Paragraph III.C.3 also provides that leakage from isolation valves that are sealed with fluid may be excluded from the summation of Type B and Type C tests. Consistent with this provision the licensee has identified that 10 of the 37 valves addressed in the December 18, 1985 application amendment are sealed by fluid and therefore are hydrostatically tested on a nominal frequency of 18 months. The acceptability of hydrostatically testing these valves in the

shutdown cooling return line and in the low pressure coolant injection line is addressed in Section 6.2 of the Limerick Safety Evaluation Report dated August 1983. The measured leakage from these hydrostatically tested valves is compared to the limit of 1 gallon per minute in the pressure isolation valve section of the TS and not to the 0.6 L<sub>g</sub> criteria for Type B and Type C tests and accordingly the testing of these valves is not within the scope of the issues addressed by the licensee's exemption request. The acceptability of the surveillance extension for hydrostatically tested valves is addressed in the safety evaluation accompanying the amendment to the technical specifications.

## 2.0 Evaluation

Since the Limerick Unit 1 plant has been through an extended startup program schedule, which included relatively little startup testing program activity from about April to early August 1985, the scheduled surveillance tests fall in a period of what would otherwise be a continuation of first fuel cycle power operations. Since the plant must be shutdown for about two weeks to perform these tests and since the licensee plans to shut the plant down on or before May 26, 1986 to perform other surveillance tests and maintenance activities the licensee proposes to extend the surveillance interval for these isolation valves to allow those tests to also be performed during the outage to begin on or before May 26, 1986. The end of the present most limiting surveillance interval is March 3, 1986.

The requirements of the TS for which extensions are proposed and the reason these tests can only be performed while the reactor is shutdown are as follows.

General Design Criterion 56, Primary Containment Isolation, requires that lines to be isolated be provided with an isolation valve inside containment and an isolation valve outside containment. The design of the isolation valves and their associated piping and test connections requires personnel access to the primary containment to isolate the valve inside the containment from the balance of its associated system and to implement the test procedure. Entry into containment during power operations would expose personnel to the hazards of high air temperature (about 120°F), radiation exposure that is high with respect to as-low-as-reasonably-achievable (ALARA) standards (about 10 R/hour in representative areas) and the nitrogen environment of the inerted containment atmosphere for which self contained breathing apparatus (SCUBA) would be required. The licensee has stated orally that they consider the hazard of the inerted containment atmosphere to be too great to permit personnel access for routine plant operational tasks. The licensee has also stated that further factors which preclude testing these valves at power include the need to depressurize the reactor, drain the reactor enclosure chilled water (RECW) system, drain the dry-well chilled water (DCW) system, drain the emergency service water (ESW) loop, remove the reactor recirculation pumps from service or a combination of the above. The staff concludes that the licensee has shown that it is not practical or feasible to test these valves at power and that the plant would be required to

shutdown for about two weeks to cooldown, depressurize and conduct the tests beginning on March 3, 1986 unless the requested extension in surveillance test periods is granted.

The licensee has stated that the types of valves subject to this surveillance schedule extension request have traditionally good maintenance histories and do not include those valves known to be maintenance intensive in boiling water reactors such as the main steam isolation valves or the feedwater check valves. The licensee also points out that these valves are used in applications where they are either normally open or normally closed and are not used in a modulating mode to control flow rates. The licensee further states that such valves when used in non-modulating applications tend not to have problems meeting leakage criteria. In this regard, the licensee has also considered the leak rate information reported in Licensee Event Report (LER) No. 352/85-102. This LER deals with a valve that is not within the scope of the Limerick surveillance schedule extension request. The licensee has reached a determination, with which the staff concurs, that the LER 85-102 event was an isolated event and as such has no significant effect upon the conclusions and basis for the request for extension.

In support of the position that these valves are reliable in meeting leakage criteria the licensee has interrogated the Nuclear Plant Reliability Data System (NPRDS) for similar types of valves and has reviewed these specific valves' previous leakrate test histories.

The NPRDS query serves as a useful qualitative estimation of these valves' reliability since the reporting of data to the system is on a voluntary basis and therefore there is no representation that the data from the system represents all of the valves in the industry of that specific valve type. Nevertheless, the data as presented in the licensee's letter dated January 29, 1986, is useful in considering whether these valve types are generally reliable in meeting their leakage criteria. The licensee notes that the valves in the NPRDS data base have been in service for significant periods whereas the Limerick valves will have experienced only a part of the first fuel cycle's operating time by the date of the next planned surveillance test. The NPRDS data does not suggest that these valves, either individually or collectively, should be expected to experience undue difficulties in meeting the leakage criteria.

The licensee states that testing has been performed on those valves that can be tested at power such that only 27 valves out of a total of 245 valves in Part A of TS Table 3.6.3-1 require the one-time extension of the 24 month surveillance interval. This is reflected in the following specific system discussions wherein, as applicable, it is noted that the extension request does not apply to all of the valves in a given system since the other valves have been tested on a more recent schedule which does not require their retest until after May 26, 1986.



Technical Specification 4.6.1.2.d-Twenty-Four Month Tests

There are 27 valves subject to this specification for which the licensee has requested one time extension of no more than 12 weeks in the surveillance test schedule. These valves are as listed below.

<u>System</u>	<u>Valve Number</u>	<u>Size/Type</u>
° LPCI injection loops A,C,D	HV-51-1F017A,C,D	12" gate
° Suppression Pool Spray	HV-51-1F027A	6" globe
° Reactor enclosure cooling water		
- supply line	HV-13-106,108,109	3" and 4" gate
- return line	HV-13-107,110,111	3" and 4" gate
° Drywell Chilled Water, Loops A and B		
- Supply lines	HV-87-120A, 125A, 128 and 120B, 125B, 122	8" gate
- Return lines	HV-87-121A, 124A, 129 and 121B, 124B, 123	8" gate
° Reactor Water Cleanup supply line	HV-44-1F001, 1F004	6" globe
° Recirculation Pump B seal purge	43-1004B	1" check
° Instrument Gas Supply to ADS valves E and K	HV-59-151B 59-1112	1" globe 1" check

The licensee's letter of January 29, 1986 also provides information on the previous leakage testing for the specific valves which are subject to this amendment request. As indicated in the licensee's letters, the total leakage measured as a result of the previous tests on all applicable Type C valve tests is about 22,000. standard cubic centimeters per minute (SCCM) which is about 23% of the total allowed by the Technical Specifications. Of this 22,000. SCCM only about 3800. SCCM (or 4% of the TS limit) was contributed by the 27 valves subject to the amendment application. Thus, it may be seen that leakage through these valves would have to increase many times before they contributed a large portion of either (1) the total measured leakage from all such valves or (2) the TS limit value. Some discussion of the individual valves is provided below.

### LPCI Injection

Valves HV51-1F017A, C and D require an extension of less than 10 weeks in a 24 month surveillance interval. The comparable valve in the B loop was tested on a schedule which does not require its retest until after May 26, 1986. The leakage from these three valves during the previous tests totaled 1210 SCCM or 1% of the TS limit valve. The line in which these valves are located is provided with instrumentation which will detect and annunciate excessive leakage past the valves.

### Suppression Pool Spray

Valve HV-51-1F027A requires an extension of about 8 weeks in a 24 month surveillance interval. The comparable valve in the B loop of suppression pool spray was tested on a schedule which does not require its retest until after May 26, 1986. The leakage from this valve during the previous test was 2.25 SCCM or 0.002% of the TS limit valve.

### Reactor Enclosure Cooling Water (RECW)

Valves HV-13-106, 108, 109 in the RECW supply line and HV-13-107, 110, 111 in the RECW return line require an extension of 12 weeks in a 24 month surveillance interval. The leakage from these valves during the previous tests was 145 SCCM or 0.15% of the TS limit for the supply valves and 9 SCCM or 0.01% of the TS limit for the return valves.

### Drywell Chilled Water

The valves in loops A and B of the drywell chilled water system, each loop having 3 involved valves in the supply line and 3 involved valves in the return line, require an extension of up to 12 weeks in a 24 month surveillance interval. The leakage from these valves during the initial tests was 203 SCCM for loop A supply valves, 653 SCCM for loop A return valves, 668 SCCM for loop B supply valves and 338 SCCM for loop B return valves for a total of 1862 SCCM or 2% of the TS limit.

### Reactor Water Cleanup

Valves HV-44-1F001, 1F004 in the RWCU supply line require an extension of less than 10 weeks in a 24 month surveillance interval. The leakage from these valves from previous tests was 510 SCCM or 0.5% of the TS limit value.

### Recirculation Pump B Seal Purge

Valve 43-1004B in the reactor recirculation pump seal purge line requires an extension of 3 weeks in a 24 month surveillance interval. The comparable valve in the A loop line was tested on a schedule which does not require its retest until after May 26, 1986. The leakage from this valve from previous tests was 76 SCCM or 0.1% of the TS limit value.

### Instrument Gas Supply to ADS Valves

Valves HV-59-151B and 59-1112 in the instrument gas supply to automatic depressurization system (ADS) valves E and K require an extension of less than 2 weeks in a 24 month surveillance interval. Comparable valves in the gas supply line for ADS valves H, M and S and other instrument gas supply and return lines were tested on a schedule which does not require retest until after May 26, 1986. The leakage from these valves during the previous tests was 9 SCCM or 0.01% of the TS limit value.

### Summary for 24 Month Surveillance Interval Valves

In assessing whether an extension of 12 weeks in a 24 month surveillance interval would be appropriate for these valves the staff has considered the previous leak rate test results for these valves, their propensity for requiring extensive maintenance to maintain their leak tight integrity and the consequences of any additional degradation during the requested extension. Based on its review the staff finds that:

- (1) The previously measured Type C test leakage through these valves (3800 SCCM) constituted but 17% of the total measured Type C leakage. There is considerable margin between these values and the limit established by Appendix J and the technical specification of 0.6 L<sub>a</sub> (94, 964 SCCM) for the Type B and C tests. These valves were not found to contribute either individually or collectively a disproportionate percentage of the total measured leakage or of the technical specification limit values.
- (2) To date these valves have not required maintenance, repairs or adjustments which would require reperformance of their Type C test. The licensee's review of similar valves via NPRDS provides a qualitative assessment that supports the licensee's findings that these valves typically have good maintenance histories, do not require intensive maintenance to ensure their leak tight integrity and thus are unlikely to degrade significantly in the period of the extension.
- (3) There is ample margin between the leakage previously measured during the Type C isolation valve tests, including the previous tests of the 27 valves subject to this amendment request, and the limiting leakage values in the technical specifications and in Appendix J to accommodate any degradation likely to be experienced by these 27 valves during the extension period. Therefore the consequences of leakage past these isolation valves is bounded by safety analyses previously performed which were based on the limiting leakage values in the technical specifications and in Appendix J.

The licensee has determined that the proposed changes to the TS will have little or no effect on containment integrity and that the proposed amendment will not alter any of the accident analyses. The staff has reviewed these determinations and the associated changes and concludes that, on the bases discussed above, they are acceptable. In addition the staff concludes that the licensee has provided sufficient bases for the temporary extension of the 24 month surveillance interval required by Appendix J and that a temporary exemption from the requirements of Paragraph III.D.3 is acceptable.

### 3.0 Conclusion

The staff has concluded, based on the considerations discussed above, that the proposed temporary exemption from 10 CFR 50, Appendix J. Paragraph III.D.3 is authorized by law, will not endanger life or property or the common defense and is otherwise in the public interest and should be granted.

Dated: March 3, 1986

[7590-01]

UNITED STATES NUCLEAR REGULATORY COMMISSION

PHILADELPHIA ELECTRIC COMPANY

LIMERICK GENERATING STATION, UNIT 1

DOCKET NO. 50-352

NOTICE OF ENVIRONMENTAL ASSESSMENT AND FINDING OF NO SIGNIFICANT IMPACT

The U.S. Nuclear Regulatory Commission (the Commission) is considering issuance of an Exemption to 10 CFR 50, Appendix J, Paragraph III.D.3 for Facility Operating License No. NPF-39, issued to the Philadelphia Electric Company (the licensee), for operation of the Limerick Generating Station, Unit 1, located in Montgomery County, Pennsylvania.

ENVIRONMENTAL ASSESSMENT

Identification of Proposed Action: This Exemption would suspend the requirement to conduct Type C leakage testing at intervals no greater than 24 months, as stated in 10 CFR 50, Appendix J, Paragraph III.D.3, for 27 containment isolation valves from March 3, 1986 until May 26, 1986.

The Need for the Proposed Action: The proposed Exemption from the regulation is required in order to allow continued operation of the plant until May 26, 1986 when the plant will be shutdown for extensive maintenance and surveillance testing activities. Without this Exemption, a forced shutdown, beginning on March 3, 1986 and lasting about two weeks, would be required in order to perform the necessary surveillance tests.

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Environmental Impacts of the Proposed Action: There are no environmental impacts of the proposed action. During the period of the extension the plant will continue with normal operations. On May 26, 1986 the plant will be shutdown and the containment isolation valve Type C leakage tests will be performed during that outage. The surveillance test will be performed at that time, in every other respect, the same as if it had been performed during an outage prior to March 3, 1986. The staff has reviewed the information provided by the licensee and finds that postponing these leakrate tests until May 26, 1986 would have little or no effect on containment integrity. No changes are being made in the allowable amounts and no significant changes are being made in the types of any effluents that may be released offsite, and there is no significant increase in the allowable individual or cumulative occupational radiation exposure. Therefore, the Commission concludes that there are no significant radiological environmental impacts associated with this proposed Exemption.

Alternative to the Proposed Actions: Since we have concluded that there is no measurable environmental impact associated with the granting of the proposed Exemption, any alternative to this Exemption will have the same or greater environmental impact.

The principal alternative would be to deny the Exemption which would require a two week shutdown beginning no later than March 3, 1986.

Alternative Use of Resources: This action does not involve the use of resources not previously considered in connection with the "Final Environmental Statement" related to the operation of the Limerick Generating Station, Unit 1, dated April 1, 1984.

Agencies and Persons Consulted: The NRC staff performed the entire review of the licensee's position and did not consult other agencies or persons.

Findings of No Significant Impact: The Commission has determined not to prepare an environmental impact statement for the proposed Exemption.

Based on the foregoing environmental assessment, we conclude that the proposed action will not have a significant effect on the quality of the human environment.

For further details with respect to this action see Amendment No. 2 to NPF-39, which is available for public inspection at the Commission's Public Document Room, 1717 H Street, N.W., Washington, DC 20555 and at the Pottstown Public

Library, 500 High Street, Pottstown, Pennsylvania 19464. A copy may be obtained on request addressed to the U.S. Nuclear Regulatory Commission, Washington, D.C. 20555, Attention: Walter R. Butler, (301) 492-7456.

Dated at Bethesda, Maryland  
this 26<sup>th</sup> day of February, 1986

FOR THE NUCLEAR REGULATORY COMMISSION



Walter R. Butler, Director  
BWR Project Directorate No. 4  
Division of BWR Licensing