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

FEB 06 1986

Docket No. 50-352

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 AMENDMENT NO. 1 TO FACILITY OPERATING LICENSE NO. NPF-39, LIMERICK GENERATING STATION, UNIT 1

The Nuclear Regulatory Commission has issued the enclosed Amendment No. 1 to Facility Operating License No. NPF-39 for the Limerick Generating Station, Unit 1. This amendment is in response to your letter dated December 18, 1985. The amendment extends on a one-time-only basis the surveillance requirements in the Technical Specifications for excess flow check valves which must be performed nominally every eighteen months and which can be done only when the plant is shutdown. Your reason for this extension is that Limerick, Unit 1 has experienced an extended startup program schedule and has been shutdown for much of the first eighteen month surveillance interval. Therefore you have requested a temporary extension of fourteen weeks in the surveillance testing to allow the testing to be performed during a maintenance and surveillance testing outage which will begin on or before May 26, 1986.

A copy of the related safety evaluation supporting Amendment No. 1 to Facility Operating License NPF-39 is enclosed.

Sincerely,

Walter R. Butler

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

Enclosures:
1. Amendment No. 1 to NPF-39
2. Safety Evaluation

cc: See next page

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

PHILADELPHIA ELECTRIC COMPANY

DOCKET NO. 50-352

LIMERICK GENERATING STATION, UNIT 1

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 1
License No. NPF-39

1. The Nuclear Regulatory Commission (the Commission) has found that:

   A. The application for amendment filed by the Philadelphia Electric Company dated December 18, 1985, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act) and the Commission's regulations as set forth in 10 CFR Chapter I;

   B. The facility will operate in conformity with the application, the provisions of the Act, and the regulations of the Commission;

   C. There is reasonable assurance: (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations set forth in 10 CFR Chapter I;

   D. The issuance of this license amendment will not be inimical to the common defense and security or to the health and safety of the public;

   E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this amendment and Paragraph 2.C(2) of Facility Operating License No. NPF-39 is hereby amended to read as follows:

   (2) Technical Specifications

   The Technical Specifications contained in Appendix A and the Environmental Protection Plan contained in Appendix B, as revised through Amendment No. 1, are hereby incorporated in the license. PECo shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. This amendment is effective immediately and is to be fully implemented within 30 days of the date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

Walter R. Butler

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

Attachment:
Changes to the Technical
Specifications

Date of Issuance: FEB 06 1986

ATTACHMENT TO LICENSE AMENDMENT NO. 1

FACILITY OPERATING LICENSE NO. NPF-39

DOCKET NO. 50-354

Replace the following pages of the Appendix A Technical Specifications with the enclosed pages. The revised pages are identified by Amendment number and contain vertical lines indicating the area of change. Also to be replaced are the following overleaf pages to the amended pages.

Amendment Pages	Overleaf Pages
3/4 6-18	3/4-6-17

3/4.6.3 PRIMARY CONTAINMENT ISOLATION VALVES

LIMITING CONDITION FOR OPERATION

3.6.3 The primary containment isolation valves and the reactor instrumentation line excess flow check valves shown in Table 3.6.3-1 shall be OPERABLE with isolation times less than or equal to those shown in Table 3.6.3-1.

APPLICABILITY: OPERATIONAL CONDITIONS 1, 2, and 3.

ACTION:

a. With one or more of the primary containment isolation valves shown in Table 3.6.3-1 inoperable, maintain at least one isolation valve OPERABLE in each affected penetration that is open and within 4 hours either:

   1. Restore the inoperable valve(s) to OPERABLE status, or
   2. Isolate each affected penetration by use of at least one de-activated automatic valve secured in the isolated position,* or
   3. Isolate each affected penetration by use of at least one closed manual valve or blind flange.*
   4. The provisions of Specification 3.0.4 are not applicable provided that within 4 hours the affected penetration is isolated in accordance with ACTION a.2. or a.3. above, and provided that the associated system, if applicable, is declared inoperable and the appropriate ACTION statements for that system are performed.

   Otherwise, be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.

b. With one or more of the reactor instrumentation line excess flow check valves shown in Table 3.6.3-1 inoperable, operation may continue and the provisions of Specifications 3.0.3 and 3.0.4 are not applicable provided that within 4 hours either:

   1. The inoperable valve is returned to OPERABLE status, or
   2. The instrument line is isolated and the associated instrument is declared inoperable.

   Otherwise, be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.

*Isolation valves closed to satisfy these requirements may be reopened on an intermittent basis under administrative control.

SURVEILLANCE REQUIREMENTS

4.6.3.1 Each primary containment isolation valve shown in Table 3.6.3-1 shall be demonstrated OPERABLE prior to returning the valve to service after maintenance, repair or replacement work is performed on the valve or its associated actuator, control or power circuit by cycling the valve through at least one complete cycle of full travel and verifying the specified isolation time.

4.6.3.2 Each primary containment automatic isolation valve shown in Table 3.6.3-1 shall be demonstrated OPERABLE during COLD SHUTDOWN or REFUELING at least once per 18 months by verifying that on a containment isolation test signal each automatic isolation valve actuates to its isolation position.

4.6.3.3 The isolation time of each primary containment power operated or automatic valve shown in Table 3.6.3-1 shall be determined to be within its limit when tested pursuant to Specification 4.0.5.

4.6.3.4 Each reactor instrumentation line excess flow check valve shown in Table 3.6.3-1 shall be demonstrated OPERABLE at least once per 18* months by verifying that the valve checks flow.

4.6.3.5 Each traversing in-core probe system explosive isolation valve shall be demonstrated OPERABLE:

a. At least once per 31 days by verifying the continuity of the explosive charge.

b. At least once per 18 months by removing the explosive squib from the explosive valve, such that each explosive squib in each explosive valve will be tested at least once per 90 months, and initiating the explosive squib. The replacement charge for the exploded squib shall be from the same manufactured batch as the one fired or from another batch which has been certified by having at least one of that batch successfully fired. No squib shall remain in use beyond the expiration of its shelf-life and/or operating life, as applicable.

* A 92 week interval ending on May 26, 1986 is permissible for the first cycle.

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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

SUPPORT AMENDMENT NO. 1 TO FACILITY OPERATING LICENSE NO. NPF-39

PHILADELPHIA ELECTRIC COMPANY

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 for temporarily extending certain surveillance requirements in the Technical Specifications, which must be performed nominally every 18 months and which can only be done when the plant is shutdown. The change would extend the 18 month surveillance interval by 14 weeks beyond the maximum 25 percent extension 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.

2.0 Evaluation

Technical Specification (TS) 4.6.3.4 requires that instrumentation line excess flow check valve surveillance tests be performed at a nominal frequency of once per 18 months. 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 the excess flow checkvalves to allow those tests to also be performed during the outage to begin on or before May 26, 1986.

The 18 month surveillance interval was selected to be consistent with the maximum anticipated interval between refueling outages. However, TS 4.0.2 does allow the time interval between surveillance testing to be extended by 25 percent in order to provide flexibility in operations scheduling. The end of the most limiting surveillance interval, including the allowable 25 percent extension for the excess flow checkvalves in TS 4.6.3.4 (Table 3.6.3-1) is February 19, 1986. Therefore, the temporary TS change would extend the permissible time to perform these tests from approximately 23 months to approximately 26 months.

The requirements of the TS for testing nominally every 18 months for which extensions are proposed and the reason these tests can only be performed while the reactor is shutdown are as follows. The excess flow check valves in TS Table 3.6.3-1 are provided in instrumentation lines for the purpose of checking flow in the line when subjected to an excessive differential pressure.

Testing of the valves to verify that they check flow involves opening of the instrumentation line downstream of the valve with the reactor coolant system cold and pressurized and verifying that the valves check flow. This operation cannot be performed during normal power operation for the following reasons: (1) the performance of the test with the reactor coolant system hot, pressurized and at power would involve potential hazards to testing personnel upon opening of the line in the unlikely event that one of the valves fails to check and releases fluid that is both at a high temperature and radioactive, and (2) the opening of the instrumentation line, since the line may serve an instrumentation manifold with multiple transmitters, would result in multiple engineered safety feature system and/or reactor protection system actuations which would either constitute conditions prohibited by Technical Specifications or result in a shutdown of the reactor.

The safety related aspects of extending this surveillance interval on a one time basis for about three months are insignificant for the following reasons. (1) Flow through the valves or from the lines in which they are located will be limited by the small line size and the provision of flow restricting orifices to further reduce potential flow rates, (2) Any leakage from these lines outside of primary containment would be contained in the secondary containment and processed by the standby gas treatment system. The analysis of such an event has already been performed and is included in the Final Safety Analysis Report in Section 15.6.2. As indicated in the FSAR there would likely be a variety of indicators to the operator of a failed instrument line thus alerting plant staff to the need to isolate the line by use of other manual valves in the line. The staff has previously reached the conclusion in section 15.6 of the SER that the Limerick instrument line design is acceptable. (3) The licensee has examined the records of the initial flow testing performed on these valves and found that all valves were tested successfully. The licensee further states that, based on available data, the valves are believed to be highly reliable in performing their function of checking flow. The staff concludes that the condition of the valves is not expected to change significantly during the short extension period.

Based on the above, the NRC staff concludes that extension of the interval for the surveillance testing by 14 weeks on a one-time-only basis is acceptable because the increased surveillance interval does not significantly increase the possibility that an undetected failure will occur in the instrumentation line excess flow check valves covered by this Technical Specification.

3.0 Environmental Consideration

This amendment changes some surveillance requirements on a one-time-only basis. The staff has determined that the amendment involves no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that this amendment involves no significant hazards consideration and there has been no public comment on such finding within the time provided by the Federal Register notice of consideration of the licensee's amendment request. Thus, there is no need to make a final determination regarding no significant hazards consideration. Accordingly, this amendment meets the

eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b) no environmental impact statement nor environmental assessment need be prepared in connection with the issuance of this amendment.

4.0 Conclusion

The staff has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, and (2) such activities will be conducted in compliance with the Commission's regulations and the issuance of this amendment will not be inimical to the common defense and security nor to the health and safety of the public.

Principal Contributors: R. E. Martin, S. Kucharski, J. S. Guo, J. Page

Dated: FEB 0 6 1986