

April 21, 1989

Docket No. 50-352

DISTRIBUTION w/enclosure

Mr. George A. Hunger, Jr.  
Director-Licensing  
Philadelphia Electric Company  
Correspondence Control Desk  
P. O. Box 7520  
Philadelphia, Pennsylvania 19101

Docket File	ACRS (10)
NRC & Local PDRs	GPA/PA
PDI-2 Reading	DHagan
SVarga	OGC (info. only)
BBoger	ETrottier
ETrottier	RClark
MO'Brien	RMartin

Dear Mr. Hunger:

SUBJECT: NOTICE OF CONSIDERATION OF ISSUANCE OF AMENDMENT TO FACILITY  
OPERATING LICENSE AND PROPOSED NO SIGNIFICANT HAZARDS CONSIDERATION  
DETERMINATION AND OPPORTUNITY FOR HEARING (TAC NO. 61000)

RE: LIMERICK GENERATING STATION, UNIT 1

The Commission has forwarded the enclosed "Notice of Consideration of Issuance of Amendment to Facility Operating License and Proposed No Significant Hazards Consideration Determination and Opportunity for Hearing" to the Office of the Federal Register for publication.

This notice relates to your application dated February 14, 1986, which requests that the Limerick Generating Station, Unit 1 Technical Specifications be changed to achieve internal consistency, remove outdated material, make minor text changes and correct errors.

Sincerely,

/s/

E. H. Trottier, Project Manager  
Project Directorate I-2  
Division of Reactor Projects I/II  
Office of Nuclear Reactor Regulation

Enclosure:  
As stated

cc w/enclosure:  
See next page

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PDI-2/PM  
MO'Brien  
04/20/89

PDI-2/PM  
ETrottier/abd  
04/26/89

PDI-2/PM  
RClark  
04/20/89

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WButler  
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[Signature]



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

April 21, 1989

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Mr. George A. Hunger, Jr.  
Director-Licensing  
Philadelphia Electric Company  
Correspondence Control Desk  
P. O. Box 7520  
Philadelphia, Pennsylvania 19101

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Sincerely,

A handwritten signature in black ink, appearing to read "E. H. Trottier".

E. H. Trottier, Project Manager  
Project Directorate I-2  
Division of Reactor Projects I/II  
Office of Nuclear Reactor Regulation

Enclosure:  
As stated

cc w/enclosure:  
See next page

Mr. George A. Hunger, Jr.  
Philadelphia Electric Company

Limerick Generating Station  
Units 1 & 2

cc:

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UNITED STATES NUCLEAR REGULATORY COMMISSIONPHILADELPHIA ELECTRIC COMPANYDOCKET NO. 50-352NOTICE OF CONSIDERATION OF ISSUANCE OF AMENDMENT TO  
FACILITY OPERATING LICENSE AND PROPOSED NO SIGNIFICANT HAZARDS  
CONSIDERATION DETERMINATION AND OPPORTUNITY FOR HEARING

The U.S. Nuclear Regulatory Commission (the Commission) is considering issuance of an amendment to 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 and Chester Counties, Pennsylvania. The proposed amendment is in response to the licensee's submittal dated February 14, 1986.

The proposed amendment would make administrative changes to the Technical Specifications (TS) to achieve consistency, remove outdated material, make minor text changes, and correct errors. The changes are grouped into four categories.

1) Category A changes deal with correction of errors or the removal of outdated material. Specifically, Pages 3/4 7-22 and 6-14 delete a reference to 5% power (at \*). Page 3/4 3-85 deletes a reference to initial criticality (at #). These references are no longer applicable. These conditions have been satisfied and the footnotes would be deleted. Page 3/4 3-85 also would add "/" between "1" and "location" for instrument 4. The primary and secondary containment isolation trip functions on the outside atmosphere to reactor enclosure and refueling area differential pressure low Trip Setpoint

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and Allowable Value on Pages 3/4 3-21 and 3/4 3-22 (items e. and f.) would use the engineering units "inches of H<sub>2</sub>O" to eliminate ambiguity. The reference to Figure B 3/4 4.6-2 on Page 3/4 4-19 (item 4.4.6.1.4) would be deleted because this figure does not exist in the TS. The drywell average air temperature sensor elevation and azimuth locations on Page 3/4 6-10 are provided to give approximate locations. The symbol " ~ " will be added to these locations. The footnote " \* " on Pages 3/4 6-47 and 3/4 6-52 will be corrected by replacing the word "and" with the word "or". The referenced penetration "035A" on Pages 3/4 6-23 and 3/4 6-42 will be corrected to "035B". An additional Action c. will be added on Page 3/4 1-2 indicating that "The provisions of Specification 4.0.4 are not applicable", because the reactor must first be in Operational Condition 1 or 2 to perform the surveillance. The number of heat detectors for Fire Zone 25 on Page 3/4 3-94 is incorrect and would be revised from "15" to "13". The two other heat detectors actually are located in the Unit 2 area. The word "positive" on Page B 3/4 6-2 , item 3/4.6.1.6, would be deleted, because the allowable containment pressure range is actually both negative and positive.

2) Category B changes deal with minor text changes to achieve consistency throughout the TS. Specifically, Specification 3.6.3 on Page 3/4 6-17 includes an Action Statement that allows four hours to restore (for example) an inoperable Main Steam Isolation Valve (MSIV), while Specification 3.4.7 on Page 3/4 4-23 allows eight hours to restore an inoperable MSIV. The change would revise Specification 3.4.7 to four hours from the existing eight hour requirement. The change to footnote " \*\* " on Pages 3/4 5-4 and 3/4 5-5 would add a requirement that "In the event that HPCI system is not

successfully demonstrated operable during the twelve hour period, then reactor steam dome pressure is to be reduced to less than 200 psig. In the event that ADS cannot be demonstrated operable during the twelve hour period, then reactor steam dome pressure is to be reduced to less than 100 psig". This would be consistent with the respective Action Statements for each system. The drywell and suppression chamber internal pressure designated in the Limiting Condition for Operation on Page 3/4 6-9 would be corrected to "-1.0 to +2.0" consistent with that specified on Page B 3/4 6-2. The change to Note 17 on Page 3/4 6-42 would include a statement that "Type C test is not required" consistent with other notations in the table and the fact that a Type A test is already indicated. The change to footnote " \* " on Pages 3/4 7-9 and 3/4 7-10 would add a requirement that "In the event that RCIC operability is not successfully demonstrated during the twelve hour period, then reactor steam dome pressure is to be reduced to less than 150 psig". This would be consistent with the RCIC Action Statement. The change to Action b. on Page 3/4 8-1 would add a reference to Action e., because Action e. could be overlooked during the performance of Action b. The change to Action Statement 101 on Page 3/4 3-100 would revise the lower limit of detection for gammas to 0.5 micro-microcuries/mL, consistent with the gamma limit specified on Page 3/4 11-2.

3) Category C changes deal with minor text changes that provide additional limitations or restrictions. Specifically, TS 3.6.2.1.c on Page 3/4 6-12 would be revised by adding an additional limit specifying that "one temperature instrument in each of the eight locations shall be operable". The existing specification calls for the operability of at least eight

indicators without denoting their locations. The change to Specification 3.6.3 on Page 3/4 6-17 and 4.3.6.4 on Page 3/4 6-18 would delete "reactor" and reference only "instrumentation" line excess flow check valves. The change allows all instrument line excess flow check valves to be referenced, rather than only the reactor instrument line excess flow check valves.

4) Category D changes deal with changes that eliminate ambiguity, delete superfluous information, correct "information only" designations or add location information.

a. Page 3/4 3-23

The addition of TABLE NOTATIONS "(a)" and "\*\*", which the licensee proposes to add to Page 3/4 3-23, Item 1.a.2), adds further clarification to include  $\leq 13$  seconds response time for associated valves (10 seconds diesel generator starting and 3 seconds sequence loading delays). This change is consistent with the specifications for the Reactor Vessel Water Level low, low-level 2 and the Main Steam Line Isolation response times for radiation, flow, and pressure, which also include the  $\leq 13$  seconds response time. These added notations eliminate ambiguity and allow for consistent interpretation. The change is justified as a clarification of the existing specifications to allow for consistency.

This proposed change falls within the example category (i) of those provided by the Commission for amendments that are not likely to involve Significant Hazards Consideration, because the proposed change allows for consistence throughout the Technical Specifications.

b. Page 3/4 6-10

The drywell average air temperature is the calculated volumetric average of the temperature readings at four drywell elevations. At elevation 330' there are three installed temperature sensors, and also three sensors installed at elevation 320', three at 260', and six at 248'.

The volumetric calculation requires only that one sensor at each elevation be read, without regard to the sensor's (compass) location, i.e., only the elevation location is of interest in the calculation and not the azimuth location. The azimuth has been listed in the surveillance requirements as an information guide, so that the exact location of each sensor is known, even though the azimuth of each sensor is not a factor in the actual calculation. Because the azimuth of each sensor is listed, relocation of any of these sensors at the same elevation would require an amendment to the Technical Specifications, even though the intent of the Technical Specifications clearly does not require this information as a limit. Some readings taken from these sensors could be erroneous if a sensor's azimuth location is not changed, because of nearby hot or cold pipes.

The licensee proposes to revise the identity of drywell temperature sensors at each elevation from "azimuth" to "quantity" to allow sensor azimuth relocation and preclude erroneous drywell readings. This flexibility will eliminate the need for amendments to the Technical Specifications each time a drywell modification calls for the relocation of a temperature sensor. To allow for physical limitations in the installation of equipment, the licensee also proposes to add the word (or symbol) "Approximate" before each elevation.

Because this proposed change merely changes the "information only" designations of "azimuth" to "quantity" at each elevation and adds "approximate" before elevation, it falls within the example category of amendments that are considered not likely to involve Significant Hazards Considerations as they constitute "a purely administrative... change in nomenclature."

Before issuance of the proposed license amendment, the Commission will have made findings required by the Atomic Energy Act of 1954, as amended (the Act) and the Commission's regulations.

The licensee has evaluated the administrative changes that achieve consistency throughout the TS, that remove outdated material, make minor text changes and correct errors against the standards provided above, and has determined that the changes do not involve a significant hazards consideration. These changes provide improvements to the TS by correcting errors, eliminating ambiguities and inconsistencies, or denoting additional limitations or restrictions. The staff agrees with this evaluation.

The Commission has provided examples (51 FR 7751) of amendments that are not likely to involve significant hazards considerations. One of these examples, (i) states that "A purely administrative change to the Technical Specifications for example a change to achieve consistency throughout the technical specifications, correction of an error, or a change in nomenclature." The proposed correction of errors and removal of outdated material listed in Category A, and the minor text changes to achieve consistency throughout the TS listed in Category B, above, are similar to example (i). A second of these examples, (ii), states that "A change that

constitutes an additional limitation, restriction, or control not presently included in the technical specification, e.g. a more stringent surveillance requirement." The proposed minor text changes that provide additional limitation or restrictions listed in Category C, above, are similar to example (ii).

The staff has reviewed the licensee's evaluation and determination and agrees with the licensee that this proposed amendment does not involve a significant hazards consideration. Therefore, the staff proposes to determine that the proposed amendment involves no significant hazards consideration.

The Commission is seeking public comments on this proposed determination. Any comments received within 30 days after the date of publication of this notice will be considered in making any final determination. The Commission will not normally make a final determination unless it receives a request for a hearing.

Written comments may be submitted by mail to the Regulatory Publications Branch, Division of Freedom of Information and Publications Services, Office of Administration and Resources Management, U.S. Nuclear Regulatory Commission, Washington, D.C. 20555, and should cite the publication date and page number of this FEDERAL REGISTER notice.

Written comments may also be delivered to Room P-216, Phillips Building, 7920 Norfolk Avenue, Bethesda, Maryland, from 7:30 a.m. to 4:15 p.m. Copies of written comments received may be examined at the NRC Public Document Room, 2120 L Street, NW, Washington, D.C. The filing of requests for hearing and petitions for leave to intervene is discussed below.

By May 30, 1989 , the licensee may file a request for a hearing with respect to issuance of the amendment to the subject facility operating license and any person whose interest may be affected by this proceeding and who wishes to participate as a party in the proceeding must file a written petition for leave to intervene. Request for a hearing and petitions for leave to intervene shall be filed in accordance with the Commission's "Rules of Practice for Domestic Licensing Proceedings" in 10 CFR Part 2. If a request for a hearing or petition for leave to intervene is filed by the above date, the Commission or an Atomic Safety and Licensing Board, designated by the Commission or by the Chairman of the Atomic Safety and Licensing Board Panel, will rule on the request and/or petition and the Secretary or the designated Atomic Safety and Licensing Board will issue a notice of hearing or an appropriate order.

As required by 10 CFR §2.714, a petition for leave to intervene shall set forth with particularity the interest of the petitioner in the proceeding, and how that interest may be affected by the results of the proceeding. The petition should specifically explain the reasons why intervention should be permitted with particular reference to the following factors: (1) the nature of the petitioner's right under the Act to be made a party to the proceeding; (2) the nature and extent of the petitioner's property, financial, or other interest in the proceeding; and (3) the possible effect of any order which may be entered in the proceeding on the petitioner's interest. The petition should also identify the specific aspect(s) of the subject matter of the proceeding as to which petitioner wishes to intervene. Any person who has filed a petition for leave to intervene or who has been admitted as a party may amend the petition without requesting leave of the Board up to fifteen

(15) days prior to the first prehearing conference scheduled in the proceeding, but such an amended petition must satisfy the specificity requirements described above.

Not later than fifteen (15) days prior to the first prehearing conference scheduled in the proceeding, a petitioner shall file a supplement to the petition to intervene which must include a list of the contentions which are sought to be litigated in the matter, and the bases for each contention set forth with reasonable specificity. Contentions shall be limited to matters within the scope of the amendment under consideration. A petitioner who fails to file such a supplement which satisfies these requirements with respect to at least one contention will not be permitted to participate as a party.

Those permitted to intervene become parties to the proceeding, subject to any limitations in the order granting leave to intervene, and have the opportunity to participate fully in the conduct of the hearing, including the opportunity to present evidence and cross-examine witnesses.

If a hearing is requested, the Commission will make a final determination on the issue of no significant hazards consideration. The final determination will serve to decide when the hearing is held.

If the final determination is that the amendment request involves no significant hazards consideration, the Commission may issue the amendment and make it effective, notwithstanding the request for a hearing. Any hearing held would take place after issuance of the amendment.

If the final determination is that the amendment involves a significant hazards consideration, any hearing held would take place before the issuance of any amendment.

Normally, the Commission will not issue the amendment until the expiration of the 30-day notice period. However, should circumstances change during the notice period such that failure to act in a timely way would result in derating or shutdown of the facility, the Commission may issue the license amendment before the expiration of the 30-day notice period, provided that its final determination is that the amendment involves no significant hazards consideration. The final determination will consider all public and State comments received. Should the Commission take this action, it will publish a notice of issuance and provide for opportunity for a hearing after issuance. The Commission expects that the need to take this action will occur very infrequently.

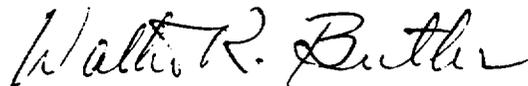
A request for a hearing or a petition for leave to intervene must be filed with the Secretary of the Commission, U.S. Nuclear Regulatory Commission, Washington, D.C. 20555, Att: Docketing and Service Branch, or may be delivered to the Commission's Public Document Room, 2120 L Street, NW Washington, D.C., by the above date. Where petitions are filed during the last ten (10) days of the notice period, it is requested that the petitioner promptly so inform the Commission by a toll-free telephone call to Western Union at (800) 325-6000 (in Missouri (800) 342-6700). The Western Union operator should be given Datagram Identification Number 3737 and the following message addressed to Walter R. Butler, Director, Project Directorate I-2, Division of Reactor Projects I/II: petitioner's name and telephone number; date petition was mailed; plant name; and publication date and page number of this FEDERAL REGISTER notice. A copy of the petition should also be sent to the General Counsel, U. S. Nuclear Regulatory Commission, Washington, D.C. 20555, and to Conner and Wetterhahn, 1747 Pennsylvania Avenue, N.W., Washington, D.C. 20006, attorney for the licensee.

Nontimely filings of petitions for leave to intervene, amended petitions, supplemental petitions and/or requests for hearing will not be entertained absent a determination by the Commission, the presiding officer or the presiding Atomic Safety and Licensing Board, that the petition and/or request should be granted based upon a balancing of factors specified in 10 CFR 2.714(a)(1)(i)-(v) and 2.714(d).

For further details with respect to this action, see the application for amendment dated February 14, 1986, which is available for public inspection at the Commission's Public Document Room, 2120 L Street, NW, Washington, D.C. 20555, and at the Local Public Document Room, Pottstown Public Library, 500 High Street, Pottstown, Pennsylvania 19464.

Dated at Rockville, Maryland, this 21st day of April 1989.

FOR THE NUCLEAR REGULATORY COMMISSION



Walter R. Butler, Director  
Project Directorate I-2  
Division of Reactor Projects I/II  
Office of Nuclear Reactor Regulation