

May 21, 19

Docket Nos. 50-352  
and 50-353

Mr. George A. Hunger, Jr.  
Director-Licensing, MC 5-2A-5  
Philadelphia Electric Company  
Nuclear Group Headquarters  
Correspondence Control Desk  
P.O. Box No. 195  
Wayne, Pennsylvania 19087-0195

DISTRIBUTION w/enclosures:

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RClark	DHagan	
GSuh	Wanda Jones	
MO'Brien	Tech Branch	

Dear Mr. Hunger:

SUBJECT: REMOVAL OF 3.25 LIMIT ON SURVEILLANCE INTERVALS (GENERIC LETTER 89-14)  
REQUEST NO. 89-14 (TAC NOS. 76400 AND 76401)

RE: LIMERICK GENERATING STATION, UNITS 1 AND 2

The Commission has issued the enclosed Amendment No. 38 to Facility Operating License No. NPF-39 and Amendment No. 5 to Facility Operating License No. NPF-85 for the Limerick Generating Station, Units 1 and 2. These amendments consist of changes to the Technical Specifications in response to your application dated March 23, 1990.

These amendments remove from the Technical Specifications, Section 4.0.2 and the associated Bases, the limitation that for any three consecutive surveillance intervals, the combined time shall not exceed 3.25 times the specified surveillance interval. The changes conform to the guidance in the NRC's Generic Letter 89-14, "Line-Item Improvements in Technical Specifications-Removal of the 3.25 Limit on Extending Surveillance Intervals" dated August 21, 1989.

A copy of our Safety Evaluation is also enclosed. Notice of Issuance will be included in the Commission's biweekly Federal Register notice.

Sincerely,

Original signed by  
Richard J. Clark

Richard J. Clark, Project Manager  
Project Directorate I-2  
Division of Reactor Projects I/II  
Office of Nuclear Reactor Regulation

Enclosures:

- Amendment No. 38 to License No. NPF-39  
Amendment No. 5 to License No. NPF-85
- Safety Evaluation

cc w/enclosures:  
See next page

[76400/1]

9006180109 900521  
PDR ADOCK 05000352  
PDC

PDI-2/LA  
MO'Brien  
4/19/90

PDI-2/PM  
RClark  
04/09/90

~~PDI-2/PM  
HSilver  
1/90~~

OGC  
BMP  
4/12/90

PDI-2/D  
WButler  
5/21/90

OGC concurrence  
Conditioned by Attachment  
NOT TO ISSUE until expiration of 30-day  
Shully notice per 101  
10.5/21



UNITED STATES  
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D. C. 20555

May 21, 1990

Docket Nos. 50-352  
and 50-353

Mr. George A. Hunger, Jr.  
Director-Licensing, MC 5-2A-5  
Philadelphia Electric Company  
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RE: LIMERICK GENERATING STATION, UNITS 1 AND 2

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These amendments remove from the Technical Specifications, Section 4.0.2 and the associated Bases, the limitation that for any three consecutive surveillance intervals, the combined time shall not exceed 3.25 times the specified surveillance interval. The changes conform to the guidance in the NRC's Generic Letter 89-14, "Line-Item Improvements in Technical Specifications-Removal of the 3.25 Limit on Extending Surveillance Intervals" dated August 21, 1989.

A copy of our Safety Evaluation is also enclosed. Notice of Issuance will be included in the Commission's biweekly Federal Register notice.

Sincerely,

A handwritten signature in cursive script that reads "Richard J. Clark".

Richard J. Clark, Project Manager  
Project Directorate I-2  
Division of Reactor Projects I/II  
Office of Nuclear Reactor Regulation

Enclosures:

1. Amendment No. 38 to  
License No. NPF-39  
Amendment No. 5 to  
License No. NPF-85
2. Safety Evaluation

cc w/enclosures:  
See next page

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

Limerick Generating Station  
Units 1 & 2

cc:

Troy B. Conner, Jr., Esquire  
Conner and Wetterhahn  
1747 Pennsylvania Ave., N.W.  
Washington, D. C. 20006

Mr. Thomas Gerusky, Director  
Bureau of Radiation Protection  
PA Dept. of Environmental Resources  
P. O. Box 2063  
Harrisburg, Pennsylvania 17120

Mr. Rod Krich 52A-5  
Philadelphia Electric Company  
955 Chesterbrook Boulevard  
Wayne, Pennsylvania 19087-5691

Single Point of Contact  
P. O. Box 11880  
Harrisburg, Pennsylvania 17108-1880

Mr. Graham M. Leitch, Vice President  
Limerick Generating Station  
Post Office Box A  
Sanatoga, Pennsylvania 19464

Mr. Philip J. Duca  
Support Manager  
Limerick Generating Station  
P. O. Box A  
Sanatoga, Pennsylvania 19464

Mr. Marty J. McCormick, Jr.  
Plant Manager  
Limerick Generating Station  
P.O. Box A  
Sanatoga, Pennsylvania 19464

Mr. Gary Edwards  
Superintendent-Technical  
Limerick Generating Station  
P. O. Box A  
Sanatoga, Pennsylvania 19464

Mr. Larry Doerflein  
U.S. Nuclear Regulatory Commission  
Region I  
475 Allendale Road  
King of Prussia, PA 19406

Mr. Gil J. Madsen  
Regulatory Engineer  
Limerick Generating Station  
P. O. Box A  
Sanatoga, Pennsylvania 19464

Mr. Thomas Kenny  
Senior Resident Inspector  
US Nuclear Regulatory Commission  
P. O. Box 596  
Pottstown, Pennsylvania 19464

Mr. John Doering  
Project Manager  
Limerick Generating Station  
P. O. Box A  
Sanatoga, Pennsylvania 19464

Mr. Larry Hopkins  
Superintendent-Operations  
Limerick Generating Station  
P. O. Box A  
Sanatoga, Pennsylvania 19464



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. 38  
License No. NPF-39

1. The Nuclear Regulatory Commission (the Commission) has found that
  - A. The application for amendment by Philadelphia Electric Company (the licensee) dated March 23, 1990, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
  - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and 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;
  - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
  - E. The issuance of this amendment is in accordance with 10 CER 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 license amendment, and paragraph 2.C.(2) of Facility Operating License No. NPF-39 is hereby amended to read as follows:

Technical Specifications

The Technical Specifications contained in Appendix A and the Environmental Protection Plan contained in Appendix B, as revised through Amendment No. 38, are hereby incorporated into this license. Philadelphia Electric Company shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. This license amendment is effective as of its date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

/s/

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

Attachment:  
Changes to the Technical  
Specifications

Date of Issuance: May 21, 1990

PDI-2/LA  
MO' Brien  
4/11/90

PDI-2/PM *etc*  
RClark: *mj*  
04/09/90

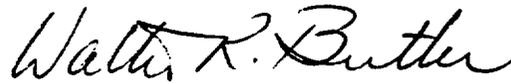
OGC *BMB*  
4/12/90  
See Condition  
of Agreement  
on letter concurrence  
sheet

PDI-2/D  
WButler  
5/2V90

*WB*

3. This license amendment is effective as of its date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION



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

Attachment:  
Changes to the Technical  
Specifications

Date of Issuance: May 21, 1990

ATTACHMENT TO LICENSE AMENDMENT NO. 38

FACILITY OPERATING LICENSE NO. NPF-39

DOCKET NO. 50-352

Replace the following pages of the Appendix A Technical Specifications with the attached page. The revised pages are identified by Amendment number and contain vertical lines indicating the area of change. Overleaf pages are provided to maintain document completeness.\*

Remove

3/4 0-1  
3/4 0-2

B 3/4 0-3  
B 3/4 0-4

Insert

3/4 0-1\*  
3/4 0-2

B 3/4 0-3\*  
B 3/4 0-4

## 3/4.0 APPLICABILITY

### LIMITING CONDITION FOR OPERATION

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3.0.1 Compliance with the Limiting Conditions for Operation contained in the succeeding Specifications is required during the OPERATIONAL CONDITIONS or other conditions specified therein; except that upon failure to meet the Limiting Conditions for Operation, the associated ACTION requirements shall be met.

3.0.2 Noncompliance with a Specification shall exist when the requirements of the Limiting Condition for Operation and associated ACTION requirements are not met within the specified time intervals. If the Limiting Condition for Operation is restored prior to expiration of the specified time intervals, completion of the ACTION requirements is not required.

3.0.3 When a Limiting Condition for Operation is not met, except as provided in the associated ACTION requirements, within one hour action shall be initiated to place the unit in an OPERATIONAL CONDITION in which the Specification does not apply by placing it, as applicable, in:

- a. At least STARTUP within the next 6 hours,
- b. At least HOT SHUTDOWN within the following 6 hours, and
- c. At least COLD SHUTDOWN within the subsequent 24 hours.

Where corrective measures are completed that permit operation under the ACTION requirements, the ACTION may be taken in accordance with the specified time limits as measured from the time of failure to meet the Limiting Condition for Operation. Exceptions to these requirements are stated in the individual Specifications.

This Specification is not applicable in OPERATIONAL CONDITION 4 or 5.

3.0.4 Entry into an OPERATIONAL CONDITION or other specified condition shall not be made when the conditions for the Limiting Condition for Operation are not met and the associated ACTION requires a shutdown if they are not met within a specified time interval. Entry into an OPERATIONAL CONDITION or other specified condition may be made in accordance with the ACTION requirements when conformance to them permits continued operation of the facility for an unlimited period of time. This provision shall not prevent passage through or to OPERATIONAL CONDITIONS as required to comply with ACTION requirements. Exceptions to these requirements are stated in the individual Specifications.

## APPLICABILITY

### SURVEILLANCE REQUIREMENTS

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4.0.1 Surveillance Requirements shall be met during the OPERATIONAL CONDITIONS or other conditions specified for individual Limiting Conditions for Operation unless otherwise stated in an individual Surveillance Requirement.

4.0.2 Each Surveillance Requirement shall be performed within the specified surveillance time interval with a maximum allowable extension not to exceed 25% of the surveillance interval.

4.0.3 Failure to perform a Surveillance Requirement within the allowed surveillance interval defined by Specification 4.0.2, shall constitute noncompliance with the OPERABILITY requirements for a Limiting Condition for Operation. The time limits of the ACTION requirements are applicable at the time it is identified that a Surveillance Requirement has not been performed. The ACTION requirements may be delayed for up to 24 hours to permit the completion of the surveillance when the allowable outage time limits of the ACTION requirements are less than 24 hours. Surveillance requirements do not have to be performed on inoperable equipment.

4.0.4 Entry into an OPERATIONAL CONDITION or other specified applicable condition shall not be made unless the Surveillance Requirement(s) associated with the Limiting Condition for Operation have been performed within the applicable surveillance interval or as otherwise specified. This provision shall not prevent passage through or to OPERATIONAL CONDITIONS as required to comply with ACTION requirements.

4.0.5 Surveillance Requirements for inservice inspection and testing of ASME Code Class 1, 2, & 3 components shall be applicable as follows:

- a. Inservice inspection of ASME Code Class 1, 2, and 3 components and inservice testing of ASME Code Class 1, 2, and 3 pumps and valves shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10 CFR Part 50, Section 50.55a(g), except where specific written relief has been granted by the Commission pursuant to 10 CFR Part 50, Section 50.55a(g) (6) (i).
- b. Surveillance intervals specified in Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda for the inservice inspection and testing activities required by the ASME Boiler and Pressure Vessel Code and applicable Addenda shall be applicable as follows in these Technical Specifications:

### 3/4.0 APPLICABILITY

#### BASES

The same principle applies with regard to the allowable outage time limits of the ACTION requirements, if compliance with the ACTION requirements for one specification results in entry into an OPERATIONAL CONDITION or condition of operation for another specification in which the requirements of the Limiting Condition for Operation are not met. If the new specification becomes applicable in less time than specified, the difference may be added to the allowable outage time limits of the second specification. However, the allowable outage time limits of ACTION requirements for a higher CONDITION of operation may not be used to extend the allowable outage time that is applicable when a Limiting Condition for Operation is not met in a lower CONDITION of operation.

The shutdown requirements of Specification 3.0.3 do not apply in CONDITIONS 4 and 5, because the ACTION requirements of individual specifications define the remedial measures to be taken.

Specification 3.0.4 establishes limitations on a change in OPERATIONAL CONDITIONS when a Limiting Condition for Operation is not met. It precludes placing the facility in a higher CONDITION of operation when the requirements for a Limiting Condition for Operation are not met and continued noncompliance to these conditions would result in a shutdown to comply with the ACTION requirements if a change in CONDITIONS were permitted. The purpose of this specification is to ensure that facility operation is not initiated or that higher CONDITIONS of operation are not entered when corrective action is being taken to obtain compliance with a specification by restoring equipment to OPERABLE status or parameters to specified limits. Compliance with ACTION requirements that permit continued operation of the facility for an unlimited period of time provides an acceptable level of safety for continued operation without regard to the status of the plant before or after a change in OPERATIONAL CONDITIONS. Therefore, in this case, entry into an OPERATIONAL CONDITION or other specified condition may be made in accordance with the provisions of the ACTION requirements. The provisions of this specification should not, however, be interpreted as endorsing the failure to exercise good practice in restoring systems or components to OPERABLE status before plant startup.

When a shutdown is required to comply with ACTION requirements, the provisions of Specification 3.0.4 do not apply because they would delay placing the facility in a lower CONDITION of operation.

Specification 4.0.1 through 4.0.5 establish the general requirements applicable to Surveillance Requirements. These requirements are based on the Surveillance Requirements stated in the Code of Federal Regulations 10 CFR 50.36(c)(3):

"Surveillance requirements are requirements relating to test, calibration, or inspection to ensure that the necessary quality of systems and components is maintained, that facility operation will be within safety limits, and that the limiting conditions of operation will be met."

Specification 4.0.1 establishes the requirement that surveillances must be performed during the OPERATIONAL CONDITIONS or other conditions for which the requirements of the Limiting Conditions for Operation apply unless otherwise stated in an individual Surveillance Requirement. The purpose of this specification is to ensure that surveillances are performed to verify the

### 3/4.0 APPLICABILITY BASES

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operational status of systems and components and that parameters are within specified limits to ensure safe operation of the facility when the plant is in an OPERATIONAL CONDITION or other specified condition for which the individual Limiting Conditions for Operation are applicable. Surveillance Requirements do not have to be performed when the facility is in an OPERATIONAL CONDITION for which the requirements of the associated Limiting Condition for Operation do not apply unless otherwise specified. The Surveillance Requirements associated with a Special Test Exception are only applicable when the Special Test Exception is used as an allowable exception to the requirements of a specification.

Specification 4.0.2 establishes the limit for which the specified time interval for Surveillance Requirements may be extended. It permits an allowable extension of the normal surveillance interval to facilitate surveillance scheduling and consideration of plant operating conditions that may not be suitable for conducting the surveillance; e.g., transient conditions or other ongoing surveillance or maintenance activities. It also provides flexibility to accommodate the length of a fuel cycle for surveillances that are performed at each refueling outage and are specified with an 18-month surveillance interval. It is not intended that this provision be used repeatedly as a convenience to extend the surveillance intervals beyond that specified for surveillances that are not performed during refueling outages. The limitation of Specification 4.0.2 is based on engineering judgment and the recognition that the most probable result of any particular surveillance being performed is the verification of conformance with the Surveillance Requirements. This provision is sufficient to ensure that the reliability ensured through surveillance activities is not significantly degraded beyond that obtained from the specified surveillance interval.

Specification 4.0.3 establishes the failure to perform a Surveillance Requirement within the allowed surveillance interval, defined by the provisions of specification 4.0.2, as a condition that constitutes a failure to meet the OPERABILITY requirements for a Limiting Condition for Operation. Under the provisions of this specification, systems and components are assumed to be OPERABLE when Surveillance Requirements have been satisfactorily performed within the specified time interval. However, nothing in this provision is to be construed as implying that systems or components are OPERABLE when they are found or known to be inoperable although still meeting the Surveillance Requirements. This specification also clarifies that the ACTION requirements are applicable when Surveillance Requirements have not been completed within the allowed surveillance interval and that the time limits of the ACTION requirements apply from the point in time it is identified that a surveillance has not been performed and not at the time that the allowed surveillance interval was exceeded. Completion of the Surveillance Requirement within the allowable outage time limits of the ACTION requirements restores compliance with the requirements of Specification 4.0.3. However, this does not negate the fact that the failure to have performed the surveillance within the allowed surveillance interval, defined by the provisions of Specification 4.0.2, was violation of the OPERABILITY requirements of a Limiting Condition for Operation that is subject to enforcement action. Further, the failure to perform a surveillance within the provisions of Specification 4.0.2 constitutes a failure to meet the OPERABILITY requirements for a Limiting Condition for Operation and any reports required by 10 CFR 50.73 shall be determined based on the length of time the surveillance interval has been exceeded, and the corresponding Limiting Conditions for Operation ACTION time requirements.



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

PHILADELPHIA ELECTRIC COMPANY

DOCKET NO. 50-353

LIMERICK GENERATING STATION, UNIT 2

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 5  
License No. NPF-85

1. The Nuclear Regulatory Commission (the Commission) has found that
  - A. The application for amendment by Philadelphia Electric Company (the licensee) dated March 23, 1990, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
  - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and 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;
  - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
  - 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 license amendment, and paragraph 2.C.(2) of Facility Operating License No. NPF-85 is hereby amended to read as follows:

Technical Specifications

The Technical Specifications contained in Appendix A and the Environmental Protection Plan contained in Appendix B, as revised through Amendment No. 5, are hereby incorporated into this license. Philadelphia Electric Company shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. This license amendment is effective as of its date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

/s/

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

Attachment:  
Changes to the Technical  
Specifications

Date of Issuance: May 21, 1990

PDI-2/LA  
MO'Brien  
H/11/90

PDI-2/PM  
RClark  
04/09/90

OGC  
SMB  
4/20/90  
see OLC  
conference  
condition  
on consentance  
copy of offer

PDI-2/D  
WButler  
5/21/90

3. This license amendment is effective as of its date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION



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

Attachment:  
Changes to the Technical  
Specifications

Date of Issuance: May 21, 1990

ATTACHMENT TO LICENSE AMENDMENT NO. 5

FACILITY OPERATING LICENSE NO. NPF-85

DOCKET NO. -50-353

Replace the following pages of the Appendix A Technical Specifications with the attached page. The revised pages are identified by Amendment number and contain vertical lines indicating the area of change. Overleaf pages are provided to maintain document completeness.\*

Remove

3/4 0-1  
3/4 0-2

B 3/4 0-3  
B 3/4 0-4

Insert

3/4 0-1\*  
3/4 0-2

B 3/4 0-3  
B 3/4 0-4

## 3/4.0 APPLICABILITY

### LIMITING CONDITION FOR OPERATION

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3.0.1 Compliance with the Limiting Conditions for Operation contained in the succeeding Specifications is required during the OPERATIONAL CONDITIONS or other conditions specified therein; except that upon failure to meet the Limiting Conditions for Operation, the associated ACTION requirements shall be met.

3.0.2 Noncompliance with a Specification shall exist when the requirements of the Limiting Condition for Operation and associated ACTION requirements are not met within the specified time intervals. If the Limiting Condition for Operation is restored prior to expiration of the specified time intervals, completion of the ACTION requirements is not required.

3.0.3 When a Limiting Condition for Operation is not met, except as provided in the associated ACTION requirements, within one hour action shall be initiated to place the unit in an OPERATIONAL CONDITION in which the Specification does not apply by placing it, as applicable, in:

- a. At least STARTUP within the next 6 hours,
- b. At least HOT SHUTDOWN within the following 6 hours, and
- c. At least COLD SHUTDOWN within the subsequent 24 hours.

Where corrective measures are completed that permit operation under the ACTION requirements, the ACTION may be taken in accordance with the specified time limits as measured from the time of failure to meet the Limiting Condition for Operation. Exceptions to these requirements are stated in the individual Specifications.

This Specification is not applicable in OPERATIONAL CONDITION 4 or 5.

3.0.4 Entry into an OPERATIONAL CONDITION or other specified condition shall not be made when the conditions for the Limiting Condition for Operation are not met, and the associated ACTION requires a shutdown if they are not met within a specified time interval. Entry into an OPERATIONAL CONDITION or other specified condition may be made in accordance with the ACTION requirements when conformance to them permits continued operation of the facility for an unlimited period of time. This provision shall not prevent passage through or to OPERATIONAL CONDITIONS as required to comply with ACTION requirements. Exceptions to these requirements are stated in the individual Specifications.

## APPLICABILITY

### SURVEILLANCE REQUIREMENTS

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4.0.1 Surveillance Requirements shall be met during the OPERATIONAL CONDITIONS or other conditions specified for individual Limiting Conditions for Operation unless otherwise stated in an individual Surveillance Requirement.

4.0.2 Each Surveillance Requirement shall be performed within the specified surveillance interval with a maximum allowable extension not to exceed 25% of the surveillance interval.

4.0.3 Failure to perform a Surveillance Requirement within the allowed surveillance interval defined by Specification 4.0.2, shall constitute noncompliance with the OPERABILITY requirements for a Limiting Condition for Operation. The time limits of the ACTION requirements are applicable at the time it is identified that a Surveillance Requirement has not been performed. The ACTION requirements may be delayed for up to 24 hours to permit the completion of the surveillance when the allowable outage time limits of the ACTION requirements are less than 24 hours. Surveillance requirements do not have to be performed on inoperable equipment.

4.0.4 Entry into an OPERATIONAL CONDITION or other specified applicable condition shall not be made unless the Surveillance Requirement(s) associated with the Limiting Condition for Operation have been performed within the applicable surveillance interval or as otherwise specified. This provision shall not prevent passage through or to OPERATIONAL CONDITIONS as required to comply with ACTION requirements.

4.0.5 Surveillance Requirements for inservice inspection and testing of ASME Code Class 1, 2, & 3 components shall be applicable as follows:

- a. Inservice inspection of ASME Code Class 1, 2, and 3 components and inservice testing of ASME Code Class 1, 2, and 3 pumps and valves shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10 CFR Part 50, Section 50.55a(g), except where specific written relief has been granted by the Commission pursuant to 10 CFR Part 50, Section 50.55a(g) (6) (i).
- b. Surveillance intervals specified in Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda for the inservice inspection and testing activities required by the ASME Boiler and Pressure Vessel Code and applicable Addenda shall be applicable as follows in these Technical Specifications:

## APPLICABILITY

### BASES

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The same principle applies with regard to the allowable outage time limits of the ACTION requirements, if compliance with the ACTION requirements for one specification results in entry into an OPERATIONAL CONDITION or condition of operation for another specification in which the requirements of the Limiting Condition for Operation are not met. If the new specification becomes applicable in less time than specified, the difference may be added to the allowable outage time limits of the second specification. However, the allowable outage time of ACTION requirements for a higher CONDITION of operation may not be used to extend the allowable outage time that is applicable when a Limiting Condition for Operation is not met in a lower CONDITION of operation.

The shutdown requirements of Specification 3.0.3 do not apply in CONDITIONS 4 and 5, because the ACTION requirements of individual specifications define the remedial measures to be taken.

Specification 3.0.4 establishes limitations on a change in OPERATIONAL CONDITIONS when a Limiting Condition for Operation is not met. It precludes placing the facility in a higher CONDITION of operation when the requirements for a Limiting Condition for Operation are not met and continued noncompliance to these conditions would result in a shutdown to comply with the ACTION requirements if a change in CONDITIONS were permitted. The purpose of this specification is to ensure that facility operation is not initiated or that higher CONDITIONS of operation are not entered when corrective action is being taken to obtain compliance with a specification by restoring equipment to OPERABLE status or parameters to specified limits. Compliance with ACTION requirements that permit continued operation of the facility for an unlimited period of time provides an acceptable level of safety for continued operation without regard to the status of the plant before or after a change in OPERATIONAL CONDITIONS. Therefore, in this case, entry into an OPERATIONAL CONDITION or other specified condition may be made in accordance with the provisions of the ACTION requirements. The provisions of this specification should not, however, be interpreted as endorsing the failure to exercise good practice in restoring systems or components to OPERABLE status before plant startup.

When a shutdown is required to comply with ACTION requirements, the provisions of Specification 3.0.4 do not apply because they would delay placing the facility in a lower CONDITION of operation.

Specification 4.0.1 through 4.0.5 establish the general requirements applicable to Surveillance Requirements. These requirements are based on the Surveillance Requirements stated in the Code of Federal Regulations 10 CFR 50.36(c)(3):

"Surveillance requirements are requirements relating to test, calibration, or inspection to ensure that the necessary quality of systems and components is maintained, that facility operation will be within safety limits, and that the limiting conditions of operation will be met."

Specification 4.0.1 establishes the requirement that surveillances must be performed during the OPERATIONAL CONDITIONS or other conditions for which the requirements of the Limiting Conditions for Operation apply unless otherwise stated in an individual Surveillance Requirement. The purpose of this specification is to ensure that surveillances are performed to verify the

## APPLICABILITY BASES

operational status of systems and components and that parameters are within specified limits to ensure safe operation of the facility when the plant is in an OPERATIONAL CONDITION or other specified condition for which the individual Limiting Conditions for Operation are applicable. Surveillance Requirements do not have to be performed when the facility is in an OPERATIONAL CONDITION for which the requirements of the associated Limiting Condition for Operation do not apply unless otherwise specified. The Surveillance Requirements associated with a Special Test Exception are only applicable when the Special Test Exception is used as an allowable exception to the requirements of a specification.

Specification 4.0.2 establishes the limit for which the specified time interval for Surveillance Requirements may be extended. It permits an allowable extension of the normal surveillance interval to facilitate surveillance scheduling and consideration of plant operating conditions that may not be suitable for conducting the surveillance; e.g., transient conditions or other ongoing surveillance or maintenance activities. It also provides flexibility to accommodate the length of a fuel cycle for surveillances that are performed at each refueling outage and are specified with an 18-month surveillance interval. It is not intended that this provision be used repeatedly as a convenience to extend the surveillance intervals beyond that specified for surveillances that are not performed during refueling outages. The limitation of Specification 4.0.2 is based on engineering judgment and the recognition that the most probable result of any particular surveillance being performed is the verification of conformance with the Surveillance Requirements. This provision is sufficient to ensure that the reliability ensured through surveillance activities is not significantly degraded beyond that obtained from the specified surveillance interval.

Specification 4.0.3 establishes the failure to perform a Surveillance Requirement within the allowed surveillance interval, defined by the provisions of Specification 4.0.2, as a condition that constitutes a failure to meet the OPERABILITY requirements for a Limiting Condition for Operation. Under the provisions of this specification, systems and components are assumed to be OPERABLE when Surveillance Requirements have been satisfactorily performed within the specified time interval. However, nothing in this provision is to be construed as implying that systems or components are OPERABLE when they are found or known to be inoperable although still meeting the Surveillance Requirements. This specification also clarifies that the ACTION requirements are applicable when Surveillance Requirements have not been completed within the allowed surveillance interval and that the time limits of the ACTION requirements apply from the point in time identified that a surveillance has not been performed and not at the time that the allowed surveillance interval was exceeded. Completion of the Surveillance Requirements within the allowable outage time limits of the ACTION requirements restores compliance with the requirements of Specification 4.0.3. However, this does not negate the fact that the failure to have performed the surveillance within the allowed surveillance interval, defined by the provisions of Specification 4.0.2, was violation of the OPERABILITY requirements of a Limiting Condition for Operation that is subject to enforcement action. Further, the failure to perform a surveillance within the provisions of Specification 4.0.2 constitutes a failure to meet the OPERABILITY requirements for a Limiting Condition for Operation and any reports required by 10 CFR 50.73 shall be determined based on the length of time the surveillance interval has been exceeded, and the corresponding Limiting Conditions for Operation ACTION time requirements.



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

SUPPORTING AMENDMENT NOS. 38 AND 5 TO FACILITY OPERATING

LICENSE NOS. NPF-39 AND NPF-85

PHILADELPHIA ELECTRIC COMPANY

LIMERICK GENERATING STATION, UNITS 1 AND 2

DOCKET NOS. 50-352 AND 50-353

1.0 INTRODUCTION

By letter dated March 23, 1990, Philadelphia Electric Company (the licensee) requested an amendment to Facility Operating License Nos. NPF-39 and NPF-85 for the Limerick Generating Station, Units 1 and 2. These proposed amendments would remove the provision of Specification 4.0.2 that limits the combined time interval of three consecutive surveillances to less than 3.25 times the specified interval. Guidance on this proposed change to TS was provided to all power reactor licensees and applicants by Generic Letter 89-14, dated August 21, 1989. ("A Line-Item Technical Specification Improvement-Removal of 3.25 Limit on Extending Surveillance Intervals.")

2.0 EVALUATION

Specification 4.0.2 includes the provision that allows a surveillance interval to be extended by 25 percent of the specified time interval. This extension provides flexibility for scheduling the performance of surveillances and to permit consideration of plant operating conditions that may not be suitable for conducting a surveillance at the specified time interval. Such operating conditions include transient plant operation or ongoing surveillance or maintenance activities. Specification 4.0.2 further limits the allowance for extending surveillance intervals by requiring that the combined time interval for any three consecutive surveillances not exceed 3.25 times the specified time interval. The purpose of this provision is to assure that surveillances are not extended repeatedly as an operational convenience to provide an overall increase in the surveillance interval. Experience has shown that the 18-month surveillance interval, with the provision to extend it by 25 percent, is usually sufficient to accommodate normal variations in the length of a fuel cycle. However, the NRC staff has routinely granted requests for one-time exceptions to the 3.25 limit on extending refueling surveillances because the risk to safety is low in contrast to the alternative of a forced shutdown to perform these surveillances. Therefore, the 3.25 limitation on extending surveillances has not been a practical limit on the use of the 25-percent allowance for extending surveillances that are performed on a refueling outage basis.

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Extending surveillance intervals during plant operation can also result in a benefit to safety when a scheduled surveillance is due at a time that is not suitable for conducting the surveillance. This may occur when transient plant operating conditions exist or when safety systems are out of service for maintenance or other surveillance activities. In such cases, the benefit to safety of extending a surveillance interval would exceed any safety benefit derived by limiting the use of the 25-percent allowance to extend a surveillance. Furthermore, there is the administrative burden associated with tracking the use of the 25-percent allowance to ensure compliance with the 3.25 limit.

In view of these findings, the staff concluded that Specification 4.0.2 should be changed to remove the 3.25 limit for all surveillances because its removal will have an overall positive effect on safety. The guidance provided in Generic Letter 89-14 included the following change to this specification and removes the 3.25 limit on three consecutive surveillances with the following statement:

4.0.2 Each Surveillance Requirement shall be performed within the specified surveillance interval with a maximum allowable extension not to exceed 25 percent of the specified surveillance interval.

In addition, the Bases of this specification were updated to reflect this change and noted that it is not the intent of the allowance for extending surveillance intervals that it be used repeatedly merely as an operational convenience to extend surveillance intervals beyond that specified.

The licensee has proposed changes to Specification 4.0.2 that are consistent with the guidance provided in Generic Letter 89-14, as noted above. On the basis of its review of this matter, the staff finds that the above changes to the TS for Limerick Units 1 and 2 are acceptable.

The NRC staff with the knowledge and consent of the licensee made typographical corrections to the licensee's Technical Specification pages.

### 3.0 ENVIRONMENTAL CONSIDERATION

These amendments involve a change to a requirement with respect to the installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20 and changes to the surveillance requirements. The staff has determined that these amendments involve 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 these amendments involve no significant hazards consideration and there has been no public comment on such finding. Accordingly, these amendments meet 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 these amendments.

#### 4.0 CONCLUSION

The Commission made a proposed determination that these amendments involve no significant hazards consideration which was published in the Federal Register (55 FR 14515) on April 18, 1990 and consulted with the Commonwealth of Pennsylvania. No public comments were received and the Commonwealth of Pennsylvania did not have any comments.

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 these amendments will not be inimical to the common defense and the security nor to the health and safety of the public.

Dated: May 21, 1990

Principal Contributor:

Richard J. Clark