

June 25, 1991

Docket Nos. 50-352  
and 50-353

DISTRIBUTION w/enclosures:

Mr. George J. Beck  
Manager-Licensing, MC 5-2A-5  
Philadelphia Electric Company  
Nuclear Group Headquarters  
Correspondence Control Desk  
P.O. Box No. 195  
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Docket File GHill(4), P1-37  
NRC & Local PDR Wanda Jones, 7103  
PDI-2 Reading CGrimes, 11E-21  
SVarga JRajan  
JCalvo ACRS(10)  
WButler GPA/PA  
MO'Brien(2) OC/LFMB  
RClark/PMilano RBlough, RGN-I  
OGC LDoerflein, RGN-I  
DHagan, MS-3206 JRaleigh

Dear Mr. Beck:

SUBJECT: LIMERICK GENERATING STATION, UNITS 1 AND 2, SNUBBER VISUAL  
INSPECTION INTERVALS PER GL 90-09 (TSCR 90-18)  
(TAC NOS. 80281 AND 80282)

The Commission has issued the enclosed Amendment No. 51 to Facility Operating License No. NPF-39 and Amendment No. 15 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 (TSs) in response to your application dated April 30, 1991.

These amendments revise TS Section 4.7.4 and the associated Bases to incorporate the recommendations on snubber visual inspection frequencies contained in Generic Letter (GL) 90-09, "Alternative Requirements for Snubber Visual Inspection Intervals and Corrective Actions."

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:

- 1. Amendment No. 51 to License No. NPF-39  
Amendment No. 15 to License No. NPF-85
- 2. Safety Evaluation

cc w/enclosures:  
See next page

OFC	:PDI-2/LA	:PDI-2/PM	:OGC	:PDI-2/D	:
NAME	:MO'Brien	:RClark	:	:WButler	:
DATE	:6/10/91	:05/31/91	:6/12/91	:6/25/91	:

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Document Name: TAC 80281/2

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P PDR

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

June 25, 1991

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and 50-353

Mr. George J. Beck  
Manager-Licensing, MC 5-2A-5  
Philadelphia Electric Company  
Nuclear Group Headquarters  
Correspondence Control Desk  
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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. 51 to  
License No. NPF-39  
Amendment No. 15 to  
License No. NPF-85
2. Safety Evaluation

cc w/enclosures:  
See next page

Mr. George J. Beck  
Philadelphia Electric Company

Limerick Generating Station  
Units 1 & 2

cc:

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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. 51  
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 April 30, 1991, 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-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. 51, are hereby incorporated into this license. Philadelphia Electric Company shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

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PDR ADDOCK 05000352  
P PDR

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

FOR THE NUCLEAR REGULATORY COMMISSION

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

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

Attachment:  
Changes to the Technical  
Specifications

Date of Issuance: June 25, 1991

ATTACHMENT TO LICENSE AMENDMENT NO. 51

FACILITY OPERATING LICENSE NO. NPF-39

DOCKET NO. 50-352

Replace the following pages of the Appendix A Technical Specifications with the attached pages. The revised pages are identified by Amendment number and contain vertical lines indicating the area of change.

<u>Remove</u>	<u>Insert</u>
3/4 7-11	3/4 7-11
3/4 7-12	3/4 7-11a
-	3/4 7-11b
-	3/4 7-12
B 3/4 7-2	B 3/4 7-2
-	-

PLANT SYSTEMS

3/4.7.4 SNUBBERS

LIMITING CONDITION FOR OPERATION

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3.7.4 All snubbers shall be OPERABLE.

APPLICABILITY: OPERATIONAL CONDITIONS 1, 2, and 3. OPERATIONAL CONDITIONS 4 and 5 for snubbers located on systems required OPERABLE in those OPERATIONAL CONDITIONS.

ACTION:

With one or more snubbers inoperable on any system, within 72 hours replace or restore the inoperable snubber(s) to OPERABLE status and perform an engineering evaluation per Specification 4.7.4g on the attached component or declare the attached system inoperable and follow the appropriate ACTION statement for that system.

SURVEILLANCE REQUIREMENTS

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4.7.4 Each snubber shall be demonstrated OPERABLE by performance of the following augmented inservice inspection program and the requirements of Specification 4.0.5.

a. Inspection Types

As used in this specification, type of snubber shall mean snubbers of the same design and manufacturer, irrespective of capacity.

b. Visual Inspections

Snubbers are categorized as inaccessible or accessible during reactor operation. Each of these categories (inaccessible and accessible) may be inspected independently according to the schedule determined by Table 4.7.4-1. The visual inspection interval for each type of snubber shall be determined based upon the criteria provided in Table 4.7.4-1 and the first inspection interval determined using this criteria shall be based upon the previous inspection interval as established by the requirements in effect before amendment (NRC will include the number of the license amendment that implements this change).

TABLE 4.7.4-1  
SNUBBER VISUAL INSPECTION INTERVAL

NUMBER OF UNACCEPTABLE SNUBBERS

Population or Category (Notes 1 and 2)	Column A Extend Interval (Notes 3 and 6)	Column B Repeat Interval (Notes 4 and 6)	Column C Reduce Interval (Notes 5 and 6)
1	0	0	1
80	0	0	2
100	0	1	4
150	0	3	8
200	2	5	13
300	5	12	25
400	8	18	36
500	12	24	48
750	20	40	78
1000 or greater	29	56	109

Note 1: The next visual inspection interval for a snubber population or category size shall be determined based upon the previous inspection interval and the number of unacceptable snubbers found during that interval. Snubbers may be categorized, based upon their accessibility during power operation, as accessible or inaccessible. These categories may be examined separately or jointly. However, the licensee must make and document that decision before any inspection and shall use that decision as the basis upon which to determine the next inspection interval for that category.

Note 2: Interpolation between population or category sizes and the number of unacceptable snubbers is permissible. Use next lower integer for the value of the limit for Columns A, B, or C if that integer includes a fractional value of unacceptable snubbers as determined by interpolation.

Note 3: If the number of unacceptable snubbers is equal to or less than the number in Column A, the next inspection interval may be twice the previous interval but not greater than 48 months.

Note 4: If the number of unacceptable snubbers is equal to or less than the number in Column B but greater than the number in Column A, the next inspection interval shall be the same as the previous interval.

TABLE 4.7.4-1 (continued)  
SNUBBER VISUAL INSPECTION INTERVAL

Note 5: If the number of unacceptable snubbers is equal to or greater than the number in Column C, the next inspection interval shall be two-thirds of the previous interval. However, if the number of unacceptable snubbers is less than the number in Column C but greater than the number in Column B, the next interval shall be reduced proportionally by interpolation, that is, the previous interval shall be reduced by a factor that is one-third of the ratio of the difference between the number of unacceptable snubbers found during the previous interval and the number in Column B to the difference in the numbers in Columns B and C.

Note 6: The provisions of Specification 4.0.2 are applicable for all inspection intervals up to and including 48 months.

c. Visual Inspection Acceptance Criteria

Visual inspections shall verify (1) that there are no visible indications of damage or impaired OPERABILITY, (2) attachments to the foundation or supporting structure are secure, and (3) fasteners for attachment of the snubber to the component and to the snubber anchorage are secure. Snubbers which appear inoperable as a result of visual inspections shall be classified as unacceptable and may be reclassified acceptable for the purpose of establishing the next visual inspection interval, providing that: (1) the cause of the rejection is clearly established and remedied for that particular snubber and for other snubbers irrespective of type on that system that may be generically susceptible; and/or (2) the affected snubber is functionally tested in the as found condition and determined OPERABLE per Specifications 4.7.4f. For those snubbers common to more than one system, the OPERABILITY of such snubbers shall be considered in assessing the surveillance schedule for each of the related systems. A review and evaluation shall be performed and documented to justify continued operation with an unacceptable snubber. If continued operation cannot be justified, the snubber shall be declared inoperable and the ACTIONS requirements shall be met.

d. Transient Event Inspection

An inspection shall be performed of all snubbers attached to sections of systems that have experienced unexpected, potentially damaging transients, as determined from a review of operational data or a visual inspection of the systems, within 72 hours for accessible systems and 6 months for inaccessible systems following this determination. In addition to satisfying the visual inspection acceptance criteria, freedom-of-motion of mechanical snubbers shall be verified using at least one of the following: (1) manually induced snubber movement; or (2) evaluation of in-place snubber piston setting; or (3) stroking the mechanical snubber through its full range of travel.

## BASES

3/4.7.4 SNUBBERS

All snubbers are required OPERABLE to ensure that the structural integrity of the reactor coolant system and all other safety related systems is maintained during and following a seismic or other event initiating dynamic loads. Snubbers excluded from this inspection program are those installed on nonsafety-related systems and then only if their failure or failure of the system on which they are installed would have no adverse effect on any safety related system.

Snubbers are classified and grouped by design and manufacturer but not by size. For example, mechanical snubbers utilizing the same design features of the 2-kip, 10-kip, and 100-kip capacity manufactured by Company "A" are of the same type. The same design mechanical snubbers manufactured by Company "B" for the purposes of this Technical Specification would be of a different type, as would hydraulic snubbers from either manufacturer.

A list of individual snubbers with detailed information of snubber location and size and of system affected shall be available at the plant in accordance with Section 50.71(c) of 10 CFR Part 50. The accessibility of each snubber shall be determined and approved by the Plant Operations Review Committee. The determination shall be based upon the existing radiation levels and the expected time to perform a visual inspection in each snubber location as well as other factors associated with accessibility during plant operations (e.g., temperature, atmosphere, location, etc.), and the recommendations of Regulatory Guides 8.8 and 8.10. The addition or deletion of any snubber shall be made in accordance with Section 50.59 of 10 CFR Part 50.

The visual inspection schedule is based on the number of unacceptable snubbers found during the previous inspection in proportion to the sizes of the various snubber populations or categories. The visual inspection interval is based on a fuel cycle of up to 24 months and may be as long as two fuel cycles or 48 months depending on the number of unacceptable snubbers found during the previous visual inspection. The visual inspection schedule provides confidence that a constant level of snubber protection is being maintained and generally allows performance of visual inspections and corrective actions during plant outages. Inspections performed before that interval has elapsed may be used as a new reference point to determine the next inspection. However, the results of such early inspections performed before the original required time interval has elapsed (nominal time less 25%) may not be used to lengthen the required inspection interval. Any inspection whose results required a shorter inspection interval will override the previous schedule.

A snubber is considered inoperable if it fails the acceptance criteria of the visual inspection.



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. 15  
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 April 30, 1991, 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. 15, 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



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

Attachment:  
Changes to the Technical  
Specifications

Date of Issuance: June 25, 1991

ATTACHMENT TO LICENSE AMENDMENT NO. 15

FACILITY OPERATING LICENSE NO. NPF-85

DOCKET NO. 50-353

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

<u>Remove</u>	<u>Insert</u>
3/4 7-11	3/4 7-11
3/4 7-12	3/4 7-11a
-	3/4 7-11b
-	3/4 7-12
B 3/4 7-1a	B 3/4 7-1a*
B 3/4 7-2	B 3/4 7-2

## PLANT SYSTEMS

### 3/4.7.4 SNUBBERS

#### LIMITING CONDITION FOR OPERATION

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3.7.4 All snubbers shall be OPERABLE.

APPLICABILITY: OPERATIONAL CONDITIONS 1, 2, and 3. OPERATIONAL CONDITIONS 4 and 5 for snubbers located on systems required OPERABLE in those OPERATIONAL CONDITIONS.

#### ACTION:

With one or more snubbers inoperable on any system, within 72 hours replace or restore the inoperable snubber(s) to OPERABLE status and perform an engineering evaluation per Specification 4.7.4g on the attached component or declare the attached system inoperable and follow the appropriate ACTION statement for that system.

#### SURVEILLANCE REQUIREMENTS

---

4.7.4 Each snubber shall be demonstrated OPERABLE by performance of the following augmented inservice inspection program and the requirements of Specification 4.0.5.

a. Inspection Types

As used in this specification, type of snubber shall mean snubbers of the same design and manufacturer, irrespective of capacity.

b. Visual Inspections

Snubbers are categorized as inaccessible or accessible during reactor operation. Each of these categories (inaccessible and accessible) may be inspected independently according to the schedule determined by Table 4.7.4-1. The visual inspection interval for each type of snubber shall be determined based upon the criteria provided in Table 4.7.4-1 and the first inspection interval determined using this criteria shall be based upon the previous inspection interval as established by the requirements in effect before amendment (NRC will include the number of the license amendment that implements this change).

TABLE 4.7.4-1  
SNUBBER VISUAL INSPECTION INTERVAL

NUMBER OF UNACCEPTABLE SNUBBERS

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200	2	5	13
300	5	12	25
400	8	18	36
500	12	24	48
750	20	40	78
1000 or greater	29	56	109

Note 1: The next visual inspection interval for a snubber population or category size shall be determined based upon the previous inspection interval and the number of unacceptable snubbers found during that interval. Snubbers may be categorized, based upon their accessibility during power operation, as accessible or inaccessible. These categories may be examined separately or jointly. However, the licensee must make and document that decision before any inspection and shall use that decision as the basis upon which to determine the next inspection interval for that category.

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Note 3: If the number of unacceptable snubbers is equal to or less than the number in Column A, the next inspection interval may be twice the previous interval but not greater than 48 months.

Note 4: If the number of unacceptable snubbers is equal to or less than the number in Column B but greater than the number in Column A, the next inspection interval shall be the same as the previous interval.

TABLE 4.7.4-1 (continued)  
SNUBBER VISUAL INSPECTION INTERVAL

- Note 5: If the number of unacceptable snubbers is equal to or greater than the number in Column C, the next inspection interval shall be two-thirds of the previous interval. However, if the number of unacceptable snubbers is less than the number in Column C but greater than the number in Column B, the next interval shall be reduced proportionally by interpolation, that is, the previous interval shall be reduced by a factor that is one-third of the ratio of the difference between the number of unacceptable snubbers found during the previous interval and the number in Column B to the difference in the numbers in Columns B and C.
- Note 6: The provisions of Specification 4.0.2 are applicable for all inspection intervals up to and including 48 months.

c. Visual Inspection Acceptance Criteria

Visual inspections shall verify (1) that there are no visible indications of damage or impaired OPERABILITY, (2) attachments to the foundation or supporting structure are secure, and (3) fasteners for attachment of the snubber to the component and to the snubber anchorage are secure. Snubbers which appear inoperable as a result of visual inspections shall be classified as unacceptable and may be reclassified acceptable for the purpose of establishing the next visual inspection interval, providing that: (1) the cause of the rejection is clearly established and remedied for that particular snubber and for other snubbers irrespective of type on that system that may be generically susceptible; and/or (2) the affected snubber is functionally tested in the as found condition and determined OPERABLE per Specifications 4.7.4f. For those snubbers common to more than one system, the OPERABILITY of such snubbers shall be considered in assessing the surveillance schedule for each of the related systems. A review and evaluation shall be performed and documented to justify continued operation with an unacceptable snubber. If continued operation cannot be justified, the snubber shall be declared inoperable and the ACTION requirements shall be met.

d. Transient Event Inspection

An inspection shall be performed of all snubbers attached to sections of systems that have experienced unexpected, potentially damaging transients, as determined from a review of operational data or a visual inspection of the systems, within 72 hours for accessible systems and 6 months for inaccessible systems following this determination. In addition to satisfying the visual inspection acceptance criteria, freedom-of-motion of mechanical snubbers shall be verified using at least one of the following: (1) manually induced snubber movement; or (2) evaluation of in-place snubber piston setting; or (3) stroking the mechanical snubber through its full range of travel.

## PLANT SYSTEMS

### BASES

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#### CONTROL ROOM EMERGENCY FRESH AIR SUPPLY SYSTEM - COMMON SYSTEM (Continued)

times are consistent with those in the Unit 1 Technical Specifications for CREFAS and AC electrical power supply out of service condition combinations.

#### 3/4.7.3 REACTOR CORE ISOLATION COOLING SYSTEM

The reactor core isolation cooling (RCIC) system is provided to assure adequate core cooling in the event of reactor isolation from its primary heat sink and the loss of feedwater flow to the reactor vessel without requiring actuation of any of the emergency core cooling system equipment. The RCIC system is conservatively required to be OPERABLE whenever reactor pressure exceeds 150 psig. This pressure is substantially below that for which low pressure core cooling systems can provide adequate core cooling.

The RCIC system specifications are applicable during OPERATIONAL CONDITIONS 1, 2, and 3 when reactor vessel pressure exceeds 150 psig because RCIC is the primary non-ECCS source of emergency core cooling when the reactor is pressurized.

With the RCIC system inoperable, adequate core cooling is assured by the OPERABILITY of the HPCI system and justifies the specified 14 day out-of-service period.

The surveillance requirements provide adequate assurance that RCIC will be OPERABLE when required. Although all active components are testable and full flow can be demonstrated by recirculation during reactor operation, a complete functional test requires reactor shutdown. The pump discharge piping is maintained full to prevent water hammer damage and to start cooling at the earliest possible moment.

## PLANT SYSTEMS

### BASES

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#### 3/4.7.4 SNUBBERS

All snubbers are required OPERABLE to ensure that the structural integrity of the reactor coolant system and all other safety related systems is maintained during and following a seismic or other event initiating dynamic loads. Snubbers excluded from this inspection program are those installed on nonsafety-related systems and then only if their failure or failure of the system on which they are installed would have no adverse effect on any safety related system.

Snubbers are classified and grouped by design and manufacturer but not by size. For example, mechanical snubbers utilizing the same design features of the 2-kip, 10-kip, and 100-kip capacity manufactured by Company "A" are of the same type. The same design mechanical snubbers manufactured by Company "B" for the purposes of this Technical Specification would be of a different type, as would hydraulic snubbers from either manufacturer.

A list of individual snubbers with detailed information of snubber location and size and of system affected shall be available at the plant in accordance with Section 50.71(c) of 10 CFR Part 50. The accessibility of each snubber shall be determined and approved by the Plant Operations Review Committee. The determination shall be based upon the existing radiation levels and the expected time to perform a visual inspection in each snubber location as well as other factors associated with accessibility during plant operations (e.g., temperature, atmosphere, location, etc.), and the recommendations of Regulatory Guides 8.8 and 8.10. The addition or deletion of any snubber shall be made in accordance with Section 50.59 of 10 CFR Part 50.

The visual inspection schedule is based on the number of unacceptable snubbers found during the previous inspection in proportion to the sizes of the various snubber populations or categories. The visual inspection interval is based on a fuel cycle of up to 24 months and may be as long as two fuel cycles or 48 months depending on the number of unacceptable snubbers found during the previous visual inspection. The visual inspection schedule provides confidence that a constant level of snubber protection is being maintained and generally allows performance of visual inspections and corrective actions during plant outages. Inspections performed before that interval has elapsed may be used as a new reference point to determine the next inspection. However, the results of such early inspections performed before the original required time interval has elapsed (nominal time less 25%) may not be used to lengthen the required inspection interval. Any inspection whose results required a shorter inspection interval will override the previous schedule.

A snubber is considered inoperable if it fails the acceptance criteria of the visual inspection.



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NOS. 51 AND 15 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 April 30, 1991, the Philadelphia Electric Company (PECO or the licensee) submitted a request for changes to the Limerick Generating Station, Units 1 and 2, Technical Specifications (TS). The requested changes would revise TS Section 4.7.4 and the associated Bases to incorporate the recommendations on snubber visual inspection frequencies contained in Generic Letter (GL) 90-09, "Alternative Requirements for Snubber Visual Inspection Intervals and Corrective Actions" dated December 11, 1990. Specifically, the revisions would remove the snubber visual examination schedule in the existing TSs and replace it with a refueling outage based visual examination schedule as listed in Table 1 of GL 90-09.

2.0 EVALUATION

The snubber visual examination schedule in the existing Technical Specifications is based on the permissible number of inoperable snubbers found during the visual examination. Because the existing snubber visual examination schedule is based only on the absolute number of inoperable snubbers found during the visual examinations irrespective of the total population of snubbers, licensee's with a large snubber population find the visual examination schedule excessively restrictive. The purpose of the alternative visual examination schedule is to allow the licensee to perform visual examinations and corrective actions during plant outages without reduction of the confidence level provided by the existing visual examination schedule. The new visual examination schedule specifies the permissible number of inoperable snubbers for various snubber populations. The basic examination interval is the normal fuel cycle up to 24 months. This interval may be extended to as long as twice the fuel cycle or reduced to as small as two-thirds of the fuel cycle depending on the number of unacceptable snubbers found during the visual examination. The examination interval may vary by  $\pm 25$  percent to coincide with the actual outage.

In the event one or more snubbers are found inoperable during a visual examination, the Limiting Conditions for Operation (LCO) in the present TS require the licensee to restore or replace the inoperable snubber(s) to operable status within 72 hours or declare the attached system inoperable and

follow the appropriate action statement for that system. This LCO will remain in the TS; however, the permissible number of inoperable snubbers(s) and the subsequent visual examination interval will now be determined in accordance with the new visual examination schedule (Table 1 of Generic Letter 90-09 dated December 11, 1990). As noted in the guidance for this line item TS improvement, certain corrective actions may have to be performed depending on the number of inoperable snubbers found. All requirements, for corrective actions and evaluations associated with the use of the visual examination schedule and stated in the footnotes 1 through 7 (Table 1 of Generic Letter 90-09), shall be included in the TS.

The licensee has provided changes to Specification 4.7.4 that are consistent with the guidance provided in Generic Letter 90-09 for the replacement of the snubber visual examination schedule with Table 1 (including footnotes 1 through 7) of the Generic Letter 90-09. On the basis of its review of this matter, the staff finds that the proposed changes to the TS for Limerick Units 1 and 2 are acceptable.

### 3.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Pennsylvania State official was notified of the proposed issuance of the amendments. The State official had no comments.

### 4.0 ENVIRONMENTAL CONSIDERATION

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

### 5.0 CONCLUSION

The Commission 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, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendments will not be inimical to the common defense and security or to the health and safety of the public.

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