

February 2, 1994

Docket No. 50-352

Mr. George A. Hunger, Jr.
Manager-Licensing, MC 52A-5
Philadelphia Electric Company
Nuclear Group Headquarters
Correspondence Control Desk
P.O. Box No. 195
Wayne, Pennsylvania 19087-0195

Dear Mr. Hunger:

SUBJECT: ENVIRONMENTAL ASSESSMENT AND FINDING OF NO SIGNIFICANT IMPACT,
RELATED TO A REQUEST FOR EXEMPTION FROM THE REQUIREMENTS OF SECTION
III.D.1.(a) OF APPENDIX J, 10 CFR PART 50, LIMERICK GENERATING
STATION, UNIT 1 (TAC NO. M88331)

The environmental assessment was prepared in response to your license
amendment application dated November 30, 1993. The application requests an
exemption from the requirements of Section III.D.1.(a) of Appendix J to 10 CFR
Part 50.

We have enclosed a copy of the Environmental Assessment and Finding of No
Significant Impact for this proposed exemption which is being forwarded to the
Office of the Federal Register for publication.

Sincerely,

/s/
Frank Rinaldi, Project Manager
Project Directorate I-2
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Enclosure:
Environmental Assessment

cc w/enclosure:
See next page

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*also comment
P306 EA*

OFFICE	PDI-2/IA	PDI-2/PM	SCSB	OGC	PDI-2/D
NAME	MO'Brien	FRinaldi	RBarrett	EHoller	CMiller
DATE	1/27/94	1/27/94	1/31/94	1/31/94	2/2/94

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CAnderson, RGN-I

comment 730 EA

OFFICE	PDI-2/NA	PDI-2/PM	SCSB	OGC	PDI-2/D
NAME	MO'Brien	FRinaldi	RBarrett	EHoller	CMiller
DATE	1/27/94	1/27/94	1/31/94	1/31/94	2/12/94

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

February 2, 1994

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Sincerely,

A handwritten signature in cursive script, appearing to read "Frank Rinaldi".

Frank Rinaldi, Project Manager
Project Directorate I-2
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Enclosure:
Environmental Assessment

cc w/enclosure:
See next page

Mr. George A. Hunger, Jr.
PECO Energy Company

Limerick Generating Station,
Units 1 & 2

cc:

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Roy Denmark, EPA (5 copies)
Environmental Review Coordinator
841 Chestnut Street
Philadelphia, Pennsylvania 19107

UNITED STATES NUCLEAR REGULATORY COMMISSIONPHILADELPHIA ELECTRIC COMPANYLIMERICK GENERATING STATION, UNIT 1DOCKET NO. 50-352ENVIRONMENTAL ASSESSMENT AND FINDING OFNO SIGNIFICANT IMPACT

The U. S. Nuclear Regulatory Commission (the Commission) is considering issuance of an exemption from the requirements of Section III.D.1.(a) of Appendix J to 10 CFR Part 50, issued to Philadelphia Electric Company (the licensee), for the Limerick Generating Station, Unit 1, located at the licensee's site in the Chester and Montgomery Counties, Pennsylvania.

ENVIRONMENTAL ASSESSMENTIdentification of Proposed Action:

The proposed action would grant an exemption from 10 CFR Part 50, Appendix J, Section III.D.1.(a) which requires a set of three Type A tests (i.e., Containment Integrated Leakage Rate Test (CILRT)) to be performed at approximately equal intervals during each 10-year service period and specifies that the third test of each set shall be conducted when the plant is shutdown for the performance of the 10-year plant inservice inspection (ISI). The exemption would allow a one-time 15-month extension of the 40 +/- 10-month interval between the Unit 1 second and third Type A test required by Technical Specifications (TS) Surveillance Requirement 4.6.1.2.a. Hence, this one-time exemption would allow the third, Unit 1, Type A test to be performed during the sixth Unit 1 refueling outage scheduled to begin in January 1996, approximately 65 months after the last Unit 1 test, thereby coinciding with

the 10-year plant ISI refueling outage.

The proposed action is in accordance with the licensee's application for exemption dated November 30, 1993.

Need for the Proposed Action:

The proposed exemption from Appendix J is required in order to allow the third Type A test to be performed during the sixth Unit 1 refueling outage scheduled to begin in January 1996, thereby coinciding with the 10-year ISI refueling outage, instead of requiring the performance of a Type A test during both the fifth and sixth Unit 1 refueling outages. This one-time extension of the Type A test interval would also result in the third Type A test being performed 20 months after the end of the Unit 1 first 10-year service period specified in 10 CFR Part 50, Appendix J, "Primary Reactor Containment Leakage Testing for Water-Cooled Reactors" (i.e., August, 1994). In this way the third Type A test would be performed during the sixth Unit 1 refueling outage which would align the start of the second 10 CFR Part 50, Appendix J, 10-year service period with the start of the second 10-year ISI period.

Environmental Impacts of the Proposed Action:

The Commission has completed the evaluation of the proposed exemption and concludes that this action would not significantly increase the probability or amount of expected primary containment leakage; hence, the containment integrity would be maintained. The current requirement in Section III.D.1.(a) of Appendix J in 10 CFR Part 50 to perform the three Type A tests would continue to be met, with the exception of the time interval between the second and the third Type A tests would be extended from 40 +/- 10 months to 65

months. The third Type A test would be performed approximately 65 months after the second Type A test and approximately 20 months after the end of the first 10 year service period. Based on the information presented in the licensee's application, the proposed extended test interval would not result in a non-detectable leakage rate in excess of the value established by 10 CFR Part 50, Appendix J, or in any changes to the containment structure or plant systems. Consequently, the probability of accidents would not be increased, nor would the post-accident radiological releases be greater than previously determined. Neither would the proposed exemption otherwise affect radiological plant effluents. Accordingly, the Commission concludes that this proposed action would result in no significant radiological environmental impact.

With regard to potential non-radiological impacts, the proposed exemption does not affect non-radiological plant effluents and has no other environmental impact. Therefore, the Commission concludes that there are no significant non-radiological environmental impacts associated with the proposed exemption.

Alternatives to the Proposed Action:

Since the Commission concluded that there are no measureable environmental effects that would result from the proposed action, any alternatives with equal or greater environmental impacts need not be evaluated.

The principal alternative would be to deny the requested exemption. This would not reduce environmental impacts of plant operation and would result in reduced operational flexibility.

Alternate Use of Resources:

This proposed action does not involve the use of any resources not previously considered in the Final Environmental Statements for the Limerick Generating Station, Units 1 and 2, dated April 1984.

Agencies and Persons Consulted:

The staff consulted with the State of Pennsylvania regarding the environmental impact of the proposed action.

FINDING OF NO SIGNIFICANT IMPACT

The Commission has determined not to prepare an environmental impact statement for the proposed exemption.

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

For further details with respect to this action, see the application for exemption dated November 30, 1993, which is available for public inspection at the Commission's Public Document Room, The Gelman Building, 2120 L Street, N.W., Washington, D.C. 20555, and at the local public document room located at Pottstown Public Library, 500 High Street, Pottstown, Pennsylvania 19464.

Dated at Rockville, Maryland, this 2nd day of February 1994.

FOR THE NUCLEAR REGULATORY COMMISSION

Charles L. Miller

Charles L. Miller, Director
Project Directorate I-2
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation