

Mr. George A. Hunger, Jr.
Director-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: REMOVING VALVES FROM TABLES 3.3.7.4-1 AND 3.6.3-1, LIMERICK
GENERATING STATION, UNIT 1 (TAC NO. M87292)

The Commission has issued the enclosed Amendment No. 65 to Facility Operating License No. NPF-39 for the Limerick Generating Station, Unit 1. This amendment consists of changes to the Technical Specifications (TSs) in response to your application dated August 3, 1993.

This amendment request removes certain remote shutdown system control valves and primary containment isolation valves from TS Tables 3.3.7.4-1, "Remote Shutdown Instrumentation and Controls," and 3.6.3-1, "Primary Containment Isolation Valves," as a result of eliminating the steam condensing mode of the Residual Heat Removal system.

You are requested to notify the Commission, in writing, when the enclosed amendment is implemented at Limerick, Unit 1.

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

Sincerely,

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

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Enclosures:

- 1. Amendment No. 65 to License No. NPF-39
- 2. Safety Evaluation

cc w/enclosures:
See next page

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

January 12, 1994

Docket No. 50-352

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

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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, appearing to read "Frank Rinaldi".

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

Enclosures:

1. Amendment No. 65 to
License No. NPF-39
2. Safety Evaluation

cc w/enclosures:
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 COMMISSION
WASHINGTON, D.C. 20555-0001

PHILADELPHIA ELECTRIC COMPANY
DOCKET NO. 50-352
LIMERICK GENERATING STATION, UNIT 1
AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 65
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 August 3, 1993, 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. 65 , 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

Charles L. Miller

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

Attachment:
Changes to the
Technical Specifications

Date of Issuance: January 12, 1994

ATTACHMENT TO LICENSE AMENDMENT NO. 65

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 page(s) are provided to maintain document completeness.*

Remove

3/4 3-79
3/4 3-80

3/4 6-29
3/4 6-30

Insert

3/4 3-79*
3/4 3-80

3/4 6-29
3/4 6-30

Table 3.3.7.4-1 (Continued)

RCIC SYSTEM (Continued)

HV-49-1F080	Control-Vacuum breaker outboard isolation valve
HV-49-1F084	Control-Vacuum breaker inboard isolation valve
FIC-49-1R001	Controller-RCIC discharge flow control
E51-S45	RCIC Turbine Trip Bypass

NUCLEAR BOILER SYSTEM

HSS-41-191	Control-Transfer switch
PSV-41-1F013A	Control-Main steam line safety/relief valve
PSV-41-1F013C	Control-Main steam line safety/relief valve
PSV-41-1F013N	Control-Main steam line safety/relief valve

RHR SYSTEM

HSS-51-192	Control-Transfer switch
HSS-51-193	Control-Transfer switch
HSS-51-194	Control-Transfer switch
HSS-51-195	Control-Transfer switch
HSS-51-196	Control-Transfer switch
HSS-51-197	Control-Transfer switch
HSS-51-198	Control-Transfer switch
HV-51-1F009	Control-RHR pump shutdown cooling suction inboard isolation
HV-51-1F008	Control-RHR shutdown cooling suction outboard isolation
HV-51-1F006A	Control-1A RHR loop shutdown cooling suction
HV-51-1F006B	Control-1B RHR loop shutdown cooling suction
HV-51-1F004A	Control-1A RHR pump suction
1AP202	Control-1A RHR pump

TABLE 3.3.7.4-1 (Continued)

RHR SYSTEM (Continued)

HV-43-1F023A	Control-Recirculation pump A suction valve
HSS-43-191	Control-Transfer switch
HV-51-1F007A	Control-1A RHR pump minimum flow bypass valve
HV-51-1F048A	Control-1A heat exchanger shell side bypass
HV-51-1F015A	Control-1A shutdown cooling injection valve
HV-51-1F016A	Control-Reactor containment spray
HV-51-1F011A	Control-1A heat exchanger flow to suppression pool
HV-51-1F017A	Control-1A RHR loop injection valve
HV-51-1F024A	Control-1A RHR loop test return
HV-51-1F027A	Control-Suppression pool sparger isolation
HV-51-1F047A	Control-1A Heat exchanger shell side inlet
HV-51-1F003A	Control-1A Heat exchanger shell side outlet
HV-51-1F049	Control-RHR Discharge to radwaste outboard isolation
HV-51-125A	Control-1A/1C test return line to suppression pool

RHR SERVICE WATER SYSTEM

HSS-12-015A-2	Control-Spray pond/cooling tower select
HSS-12-015C-2	Control-Spray pond/cooling tower select
HSS-12-016A-2	Control-Spray/bypass select
HSS-12-016C-2	Control-Spray/bypass select

TABLE 3.6.3-1 (Continued)

PART A - PRIMARY CONTAINMENT ISOLATION VALVES

PENETRATION NUMBER	FUNCTION	INBOARD ISOLATION BARRIER	OUTBOARD ISOLATION BARRIER	MAX. ISOL. TIME IF APP. (SEC)(26)	ISOL. SIGNAL(S) IF APP. (20)	NOTES	P & ID
226A	RHR MINIMUM RECIRC		HV51-105A	40		4,22,29	51
226B	RHR MINIMUM RECIRC		HV51-105B	40		4,22,29	51
227	ILRT DATA ACQUISITION SYSTEM	60-1073	60-1074	NA NA			60
228D	HPCI VACUUM RELIEF	HV55-1F095	HV55-1F093	40 40	H,LA H,LA	4,11,24 11,24	55
230B	INSTRUMENTATION - DRYWELL SUMP LEVEL	--	HV61-102 HV61-112 HV61-132	45 45 45		1,23,29 23,29 23,29	61
231A	DRYWELL FLOOR DRAIN SUMP DISCHARGE	HV61-110	HV61-111	30 30	B,H B,H	11,22 11,22	61
231B	DRYWELL EQUIPMENT DRAIN TANK DISCHARGE	HV61-130	HV61-131	30 30	B,H B,H	11,22 11,22	61
235	CS PUMP MINIMUM RECIRC		HV52-1F031A	45	LFCH	5,22,29	52
236	HPCI PUMP MINIMUM RECIRC		HV55-1F012	15	LFHP	5,22	55

LIMERICK UNIT 1

3/4 6-29

Amendment No. 18, 33, 65

TABLE 3.6.3-1 (Continued)

PART A - PRIMARY CONTAINMENT ISOLATION VALVES

<u>PENETRATION NUMBER</u>	<u>FUNCTION</u>	<u>INBOARD ISOLATION BARRIER</u>	<u>OUTBOARD ISOLATION BARRIER</u>	<u>MAX. ISOL. TIME. IF APP. (SEC)(26)</u>	<u>ISOL. SIGNAL(S) IF APP. (20)</u>	<u>NOTES</u>	<u>P&ID</u>
237-1	SUPPRESSION POOL CLEANUP PUMP SUCTION	HV52-127	PSV52-127 HV52-128	60 NA 60	B,H B,H	4,11,22 11,22 11,22	52
237-2	SUPPRESSION POOL LEVEL INSTRUMENTATION		HV52-139 SV52-139	45 6		10 10	52
238	RHR RELIEF VALVE DISCHARGE		HV-C-51-1F104B PSV51-106B	18 NA	C,G	19	51
239	RHR RELIEF VALVE DISCHARGE		HV-C-51-1F103A PSV51-106A	18 NA	C,G	19	51
241	RCIC VACUUM RELIEF	HV49-1F084	HV49-1F080	40 40	H,KA H,KA	4,11,24 11,24	49

LIMERICK - UNIT 1

3/4 6-30

Amendment No. 65



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 65 TO FACILITY OPERATING LICENSE NO. NPF-57

PHILADELPHIA ELECTRIC COMPANY
LIMERICK GENERATING STATION, UNIT 1

DOCKET NO. 50-352

1.0 INTRODUCTION

By letter dated August 3, 1993, the Philadelphia Electric Company (the licensee) submitted a request for changes to the Limerick Generating Station, Unit 1, Technical Specifications (TS). The requested changes would remove certain remote shutdown system control valves and primary containment isolation valves from TS Tables 3.3.7.4-1, "Remote Shutdown Instrumentation and Controls," and 3.6.3-1, "Primary Containment Isolation Valves," as a result of eliminating the steam condensing mode of the Residual Heat Removal (RHR) system.

2.0 BACKGROUND

The steam condensing mode is used to condense steam while the reactor is isolated from the main condenser and vessel level is maintained by the Reactor Core Isolation Cooling (RCIC) system. The heat removed in the RHR heat exchangers is transported to the ultimate heat sink by the RHR service water system. The steam condensing mode of the RHR system, addressed in Chapter 5 of the Updated Final Safety Analysis Report does not take credit for this mode to mitigate an accident. The RHR system steam condensing mode is a non-safety-related function of RHR. However, the RHR components associated with this mode are safety-related for pressure and structural integrity.

Currently, power is removed from the steam admission valves to the RHR heat exchangers and the valves locked in the closed position, which renders the mode inoperable. The licensee continues to perform routine preventive maintenance and surveillance testing on various components associated with the steam condensing mode due to TS requirements.

3.0 EVALUATION

During the upcoming Unit 1 fifth refueling outage the licensee has planned a modification to remove from service the remainder of the steam condensing mode components, thereby, eliminating further required testing or preventive maintenance on these components.

The proposed modification will result in downgrading the portion of RHR system piping left in place, from safety-related to non-safety-related. The valves

to be removed from service or left in place, are those designed only for the RHR system steam condensing mode. The piping left in place will no longer be a part of the primary containment pressure boundary and will be isolated from the RHR and HPCI systems. The modification will not affect the operation or safety-related function of the RHR or High Pressure Coolant Injection (HPCI) systems. The valves or piping that is removed will have flanges and penetration caps installed which will become part of the primary containment boundary. Periodic tests for leakage will be performed on the flanges and penetration caps in accordance with the primary containment Integrated Leak Rate Testing (ILRT) Program; they are not subject to Type B (local leak rate) testing because they are fully welded in place.

The requested change involves the deletion of the following valves from TS Table 3.3.7.4-1, "Remote Shutdown Instrumentation and Controls" and TS Table 3.6.3-1, "Primary Containment Isolation Valves".

RHR heat exchanger discharge line to Reactor Core Isolation Cooling (RCIC) system valve: HV-51-1F026A

Steam supply line to RHR heat exchanger valve: HV-51-1F052A

Steam supply line to RHR heat exchanger warm-up bypass valve: HV-51-153A

RHR system steam condensing mode relief valve discharge: PSV-51-101A (B), PSV-51-1F055A (B), PSV-51-1F097

These valves are not containment isolation valves and will be left in place. The piping associated with valves HV-51-1F052A and HV-51-153A will be removed and steel plates will be welded at the ends. This will isolate the RHR system from the HPCI system. Valve HV-51-1F026A will be left in place and de-energized in the closed position.

The PSVs will be physically removed and replaced by blank flanges. The primary containment penetration X-240 associated with valve PSV-51-1F097 will be capped and will become part of the primary containment structure. The remaining portion of the piping between primary containment penetration X-240 and the flanges replacing the PSVs will not be affected and will continue to meet the original design requirements.

The RHR vacuum relief suction inboard Primary Containment Isolation Valve (PCIV) HV-51-130 and the associated piping leading up to the outboard PCIV HV-51-131 will be removed. The HV-51-131 valve will be abandoned in place and de-energized in the closed position. The primary containment penetration X-225 associated with valve HV-51-131 will be capped, as well as the piping upstream of the valve.

All safety-related flanges and pipe caps installed on the safety-related portions of piping for the RHR and HPCI systems, and the primary containment penetration caps will be fabricated and installed in accordance with the

original design requirements. All piping and components that remain operable will continue to meet the original design requirements.

The staff has evaluated the deletion of the identified remote shutdown system control valves and primary containment isolation valves from the Technical Specifications and concludes that they do not degrade the ability of RHR, and HPCI systems to respond to an accident. Basically, only valves specifically used for the RHR system steam condensing mode will be abandoned in place or removed from the plant. In addition, the other modes of RHR (e.g., Low Pressure Coolant Injection and Shutdown Cooling) will not be affected by the modification.

Therefore, the staff finds the deletion of certain remote shutdown system control valves and PCIVs from the TS, and the proposed modification to the steam condensing mode of RHR acceptable.

3.0 STATE CONSULTATION

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

4.0 ENVIRONMENTAL CONSIDERATION

The amendment changes a requirement with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20. The NRC staff has determined that the amendment involves no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendment involves no significant hazards consideration, and there has been no public comment on such finding (58 FR 50969). Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendment.

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 amendment will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributor: J. Zimmerman

Date: January 12, 1994