

September 19, 1990

Docket No. 50-352

DISTRIBUTION w/enclosures:

Mr. George A. Hunger, Jr.  
Director-Licensing, MC 5-2A-5  
Philadelphia Electric Company  
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Correspondence Control Desk  
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Wayne, Pennsylvania 19087-0195

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BBoger	GHill (4)	
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RClark	DHagan	
GSuh	Wanda Jones	
MO'Brien	LDoerflein	

Dear Mr. Hunger:

SUBJECT: FIRE PROTECTION MODIFICATIONS (TSCR NO. 90-05-1), LIMERICK GENERATING STATION, UNIT 1 (TAC NO. 76860)

The Commission has issued the enclosed Amendment No. 45 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 June 1, 1990.

This amendment revises the TSs to reflect two fire protection modifications which you have committed to perform during the upcoming refueling outage. These modifications will replace the existing suppression pool water temperature indication (actually the water temperature at the suction of the 'A' Residual Heat Removal pump) at the Remote Shutdown Panel (RSP) with direct temperature indication of the suppression pool water and will provide for the control of emergency power to the Reactor Core Isolation Cooling (RCIC) System steam supply line inboard containment isolation valve from the RSP.

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

9010100040 900919  
PDR ADDCK 05000352  
P PNU

Enclosures:

1. Amendment No. 45 to License No. NPF-39
2. Safety Evaluation

cc w/enclosures:  
See next page

Document Name: TAC NO. 76860

PDI-2/PA  
MO'Brien  
8/24/90

PDI-2/PM  
RClark  
08/10/90  
09/17/90

OGC  
J Hill  
8/29/90

PDI-2/D  
WButler  
9/17/90

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

September 19, 1990

Docket No. 50-352

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

Dear Mr. Hunger:

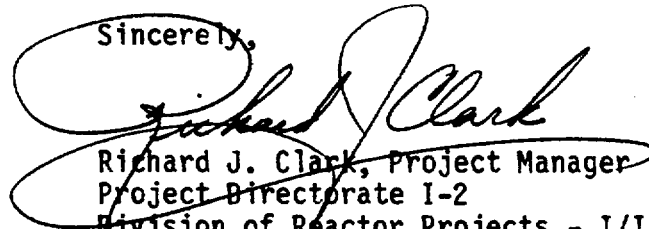
SUBJECT: FIRE PROTECTION MODIFICATIONS (TSCR NO. 90-05-1), LIMERICK  
GENERATING STATION, UNIT 1 (TAC NO. 76860)

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Sincerely,



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

Enclosures:

1. Amendment No. 45 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

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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. 45  
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 June 1, 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-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. 45, are hereby incorporated into this license. Philadelphia Electric Company shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

9010100042 900919  
PDR ADOCK 05000352  
P PNU

3. This license amendment is effective October 1, 1990.

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: September 19, 1990

Document Name: TAC NO. 76860

*WLB*  
PDI-2/LA  
N. L. L. L. L.  
8/24/90

PDI-2/PM  
R. Clark  
08/10/90

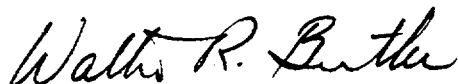
*WB*  
PDI-2/D  
W. Butler  
9/17/90

OGC  
J. Hull  
8/29/90

*JTH*  
Subject to revisions  
as noted in SER  
Draft

3. This license amendment is effective October 1, 1990.

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: September 19, 1990

ATTACHMENT TO LICENSE AMENDMENT NO. 45

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. Overleaf pages are provided to maintain document completeness.\*

Remove

3/4 3-77  
3/4 3-78

3/4 8-23  
3/4 8-24

Insert

3/4 3-77  
3/4 3-78\*

3/4 8-23\*  
3/4 8-24

TABLE 3.3.7.4-1

REMOTE SHUTDOWN SYSTEM INSTRUMENTATION AND CONTROLS

<u>INSTRUMENT</u>	<u>MINIMUM INSTRUMENTS OPERABLE</u>
1. Reactor Vessel Pressure	1
2. Reactor Vessel Water Level	1
3. Safety/Relief Valve Position, 3 valves	1/valve
4. Suppression Chamber Water Level	1
5. Suppression Chamber Water Temperature	1
6. Drywell Pressure	1
7. Drywell Temperature	1
8. RHR System Flow	1
9. RHR Service Water Pump Discharge Pressure	1
10. RHR Heat Exchanger Service Water Outlet Pressure	1
11. RCIC System Flow	1
12. RCIC Turbine Speed	1
13. Emergency Service Water Pump Discharge Pressure	1
14. Condensate Storage Tank Level	1
15. RHR Heat Exchanger Bypass Valve (HV51-1F048A) Position Indication (0 - 100%)	1
16. RCIC Turbine Tripped Indication	1
17. RCIC Turbine Bearing Oil Pressure Low Indication	1
18. RCIC LP Bearing Oil Temperature High Indication	1
19. RHR Heat Exchanger Discharge Line High Radiation Indication	1

LIMERICK - UNIT 1

3/4 3-77

Amendment No. 45



TABLE 3.3.7.4-1 (Continued)

REMOTE SHUTDOWN SYSTEM CONTROLS

RCIC SYSTEM

HSS-49-191	Control-Transfer Switch
HSS-49-192	Control-Transfer Switch
HSS-49-193	Control-Transfer Switch
HSS-49-195	Control-Transfer Switch
HSS-49-196	Control-Transfer Switch
HV-49-1F076	Control-Steam Line warmup bypass valve
HV-49-1F060	Control-RCIC turb exhaust to suppression pool isolation
HV-50-112	Control-Turb trip throttle valve
HV-50-1F045	Control-Turbine steam supply valve
HV-49-1F008	Control-Turbine steam line outboard isolation valve
HV-49-1F007	Control-Turbine steam line inboard isolation valve
HV-49-1F031	Control-RCIC pump suction from suppression pool
HV-49-1F029	Control-RCIC pump suction from suppression pool
HV-49-1F010	Control-RCIC pump suction from condensate storage tank
HV-49-1F019	Control-Minimum flow bypass to suppression pool
HV-49-1F022	Control-Test return to condensate storage tank
HV-50-1F046	Control-RCIC turbine cooling water valve
HV-49-1F012	Control-RCIC pump disch valve
HV-49-1F013	Control-RCIC pump disch valve
10P220	Control-Vacuum tank condensate pump
10P219	Control-Barometric condenser vacuum pump
HV-49-1F002	Control-Barometric condenser vacuum pump disch

TABLE 3.8.4.1-1

PRIMARY CONTAINMENT PENETRATION CONDUCTOR  
OVERCURRENT PROTECTIVE DEVICES

1. 4160-VOLT CIRCUIT BREAKERS

CIRCUIT BREAKER NO.	LOCATION	SYSTEMS OR EQUIPMENT POWERED
152-20101	10A201	1A Reactor Recirc Pump 'A' RPT Breaker
152-20102	10A201	1A Reactor Recirc Pump 'B' RPT Breaker
152-20201	10A202	1B Reactor Recirc Pump 'A' RPT Breaker
152-20202	10A202	1B Reactor Recirc Pump 'B' RPT Breaker

2. 480-VOLT MOLDED CASE BREAKERS\*

\*Primary and backup breakers have the same device numbers and are located in the same Motor Control Center cubicle.

CIRCUIT BREAKER NO.	LOCATION	TYPES	SYSTEMS OR EQUIPMENT POWERED
52-21108	D114-R-G	IM HFB100 TM HFB100	1A1 Drywell Area Unit Cooler 1A1V212
52-21109	D114-R-G	IM HFB100 TM HFB100	1E1 Drywell Area Unit Cooler 1E1V212
52-21110	D114-R-G	IM HFB100 TM HFB100	1C1 Drywell Area Unit Cooler 1C1V212
52-21111	D114-R-G	IM HFB100 TM HFB100	1G1 Drywell Area Unit Cooler 1G1V212
52-21124	D114-R-G	IM HFB25 TM HFB100	RHR S/D C1g. Suction Inbrd Isol Vlv HV-51-1F009
52-21126	D114-R-G	IM HFB50 TM HFB100	RWCU Inbrd Isol Vlv HV-44-1F001
52-21138	D114-R-G	IM HFB25 TM HFB40	Mn Stm Line Drain Inbrd Isol Vlv HV-41-1F016
52-21141	D114-R-G	IM HFB25 TM HFB40	Inst Gas Compr Suct Line Inbrd Isol Vlv HV-59-101

TABLE 3.8.4.1-1 (Continued)

PRIMARY CONTAINMENT PENETRATION CONDUCTOR

OVERCURRENT PROTECTIVE DEVICES

2. 480-VOLT MOLDED CASE BREAKERS (Continued)

CIRCUIT BREAKER NO.	LOCATION	TYPES	SYSTEMS OR EQUIPMENT POWERED
52-21208	D124-R-G	IM HFB100 TM HFB100	1B1 Drywell Area Unit Cooler 1B1V212
52-21209	D124-R-G	IM HFB100 TM HFB100	1F1 Drywell Area Unit Cooler 1F1V212
52-21210	D124-R-G	IM HFB100 TM HFB100	1D1 Drywell Area Unit Cooler 1D1V212
52-21211	D124-R-G	IM HFB100 TM HFB100	1H1 Drywell Area Unit Cooler 1H1V212
52-21216	D124-R-G	IM HFB25 TM HFB100	1B Reactor Recirc Pump Suction Vlv HV-43-1F023B
52-21309	D114-R-C	IM HFB50 TM HFB150	Feedwater Line 'A' Inbrd Maint Vlv HV-41-1F011A
52-21331	D114-R-C	IM HFB25 TM HFB40	RCIC Mn Stm Supply Inbrd Isol Vlv HV-49-1F007 Emergency Power
52-21707	D134-R-H	IM HFB100 TM HFB100	1C2 Drywell Area Unit Cooler 1C2V212
52-21708	D134-R-H	IM HFB100 TM HFB100	1G2 Drywell Area Unit Cooler 1G2V212
52-21807	D144-R-H	IM HFB100 TM HFB100	1D2 Drywell Area Unit Cooler 1D2V212
52-21808	D144-R-H	IM HFB100 TM HFB100	1F2 Drywell Area Unit Cooler 1F2V212
52-22310	D134-R-E	IM HFB100 TM HFB100	1A2 Drywell Area Unit Cooler 1A2V212
52-22311	D134-R-E	IM HFB100 TM HFB100	1E2 Drywell Area Unit Cooler 1E2V212
52-22313	D134-R-E	IM HFB25 TM HFB40	RCIC Mn Stm Supply Inbrd Isol Vlv HV-49-1F007
52-22314	D134-R-E	IM HFB50 TM HFB100	Feedwater Line 'B' Inbrd. Maint Vlv HV-41-1F011B



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION  
SUPPORTING AMENDMENT NO. 45 TO FACILITY OPERATING LICENSE NO. NPF-39  
PHILADELPHIA ELECTRIC COMPANY  
LIMERICK GENERATING STATION, UNIT 1  
DOCKET NO. 50-352

1.0 INTRODUCTION

By letter dated June 1, 1990, Philadelphia Electric Company (the licensee) requested an amendment to Facility Operating License No. NPF-39 for the Limerick Generating Station (LGS), Unit 1. The proposed amendment would revise the Technical Specifications (TS) to reflect two fire protection modifications which the licensee has committed to perform during the fall of 1990 refueling outage of Unit 1.

Modification No. 1 would replace the existing suppression pool water temperature indication (actually the water temperature at the suction of the 'A' Residual Heat Removal pump) at the Remote Shutdown Panel (RSP) with direct temperature indication of the suppression pool water by using spare resistance temperature detector elements from the existing Suppression Pool Temperature Monitoring System (SPTMS).

Modification No. 2 would provide the ability at the RSP to manually transfer from the normal power supply to the emergency power supply when fire-induced damage prevents the reopening of a valve (described below) needed to ensure safe plant shutdown.

These modifications are proposed to be performed during the next (third) refueling outage for LGS, Unit 1, currently scheduled to begin in September 1990, based on commitments in Licensee Event Report (LER) Nos. 1-89-002, "Unavailability of the Reactor Core Isolation Cooling System Due to Insufficient Protection of Various Control and Power Cables from Postulated Fire Damage," Rev. 01, dated March 31, 1989, and 1-89-023, "Lack of Protected Suppression Pool Level and Temperature Indication in the Event of a Fire," dated May 5, 1989. For plants licensed after January 1, 1979 (such as LGS, Unit 1), the requirements of 10 CFR 50.48 have been incorporated into Appendix R.

2.0 DISCUSSION:

Modification No. 1

The remote shutdown system instrumentation and controls located on RSP were designed in accordance with General Design Criterion (GDC) 19 of 10 CFR Part 50, Appendix A to ensure that sufficient capability is available

for prompt hot shutdown of the reactor from locations outside of the main control room (MCR) in the event MCR habitability is lost. The remote shutdown system instrumentation and controls are also used to satisfy the shutdown requirements for shutdown from outside of the MCR in the event of a fire. TS Table 3.3.7-4-1, "Remote Shutdown System Instrumentation and Controls," TS page 3/4 3-77, currently reflects that the suppression pool water temperature indication at the RSP is actually an indication of the water temperature at the suction of the 'A' Residual Heat Removal (RHR) pump (i.e., when the RHR pump is aligned for suppression pool cooling).

In LER No. 1-89-023 for LGS, Unit 1, the licensee reported that this indication of suppression pool water temperature may be lost in the event of a fire for which shutdown from the RSP is required since the 'A' RHR pump suction water temperature indicator, TI-51-104A, is powered from a non-Class 1E electrical power source and its associated cabling is not protected from fire damage. In LER 1-89-023, the licensee committed to perform a modification during the third refueling outage to provide suppression pool water temperature indication at the RSP which would be available to support safe shutdown of the plant from outside the MCR in the event of a fire. This proposed modification will replace the 'A' RHR pump suction water temperature indication at the RSP with direct temperature indication of the suppression pool water using spare resistance temperature detector (RTD) elements from the existing SPTMS. SPTMS provides suppression pool water temperature indication in the MCR only. This proposed modification will provide suppression pool water temperature indication which is powered from a Class 1E electrical power source and for which the associated cabling is protected from fire damage.

Once this proposed modification is complete, the TS reference "(Actually RHR Pump 'A' Suction Temperature)" for the suppression pool water temperature indication on TS Table 3.3.7.4-1 will no longer be valid. Therefore, a change is proposed to TS page 3/4 3-77 to delete this reference such that TS Table 3.3.7.4-1 will specify "Suppression Chamber Water Temperature" only.

#### Modification No. 2

The Reactor Core Isolation Cooling (RCIC) system is used to support certain methods of safe shutdown of the plant in the event of a fire. In LER No. 1-89-002, the licensee reported that a fire in certain areas of the plant could result in the unavailability of the RCIC system's steam supply line inboard containment isolation valve, HV-49-1F007. This valve is controlled from the RSP in support of safe shutdown from outside the MCR in the event of a fire. Although the RSP is powered by electrical Division 1 AC power, the HV-49-1F007 valve is powered from electrical Division 3 AC power, and will automatically close upon receipt of a Division 3 isolation signal. However, Division 3 control and power cables were not protected in those fire areas for which the RCIC system is used to support safe shutdown of the plant in the event of a fire. Fire-induced damage to the Division 3 control cables could produce a false isolation signal which would cause the HV-49-1F007 valve to close. Fire-induced damage to the Division 3 cables, from the same fire, could cause a loss of power required to reopen the valve.

If, in the event of a fire, the valve closes and power is lost before the valve can be reopened, the RCIC system would be rendered inoperable. In LER 1-89-002, the licensee committed to perform a modification during the third refueling outage which would provide the capability, through a manual transfer switch located at the RSP, to power valve HV-48-1F007 from an emergency (Division 1) power source. This emergency power source would be available in the event of a fire to provide the ability to reopen the valve. As part of the proposed modification, this emergency source will be powered through a normally locked open, instantaneous magnetic circuit breaker mounted in an electrical Division 1 motor control center (MCC). Also, a second, normally closed, thermomagnetic circuit breaker will be added as a back-up breaker to provide the redundant protection specified by Regulatory Guide 1.63, "Electric Penetration Assemblies in Containment Structures for Nuclear Power Plants," for electrical cables and wiring that penetrate the primary containment. This second circuit breaker is also required to assure capability to disconnect from the Division 1 power bus for any faulted load condition.

As a result of this proposed modification, a change is proposed to TS Table 3.8.4.1-1, "Primary Containment Penetration Conductor Overcurrent Protective Devices," TS page 3/4 8-24. The change would add to this table the primary and backup circuit breakers for the Division 1 emergency power supply to the RCIC system's steam supply inboard containment isolation valve, HV-49-1F007. Both breakers are identified by a single circuit breaker number 52-21331, since both breakers are located in the same MCC cubicle. TS Table 3.8.4.1-1 currently lists the primary and backup breakers (circuit breaker no. 52-22313) for the normal Division 3 power supply to the HV-49-1F007 valve.

### 3.0 EVALUATION

Modification No. 1 will provide assured suppression pool water temperature monitoring capability which will continue to satisfy GDC 19 of 10 CFR Part 50, Appendix A, since it will provide direct indication of suppression pool water temperature at the RSP instead of the 'A' RHR pump suction water temperature, and it will also provide the operator with the ability to select between two temperature elements on opposite sides of the suppression pool to give a better profile of the suppression pool water temperature.

This modification does not add any new interfaces with systems that are not related to suppression pool temperature monitoring. The design temperature monitoring capability of SPTMS is unaffected by the proposed modification. There is no impact on RHR system operation and the 'A' RHR pump suction water temperature indication is still available in the MCR.

The new temperature instrumentation loop will provide increased reliability since its design conforms to applicable criteria for physical separation, redundancy, and divisionalization. This new temperature instrumentation loop will be powered from an electrical Division 1, Class 1E source.

Modification No. 2 will provide the RSP operator the ability to manually switch to an emergency power supply. This action may be required to reopen valve HV-49-1F007 in the event the valve closes and the normal Division 3 power supply is lost as the result of fire-induced damage caused by a fire in certain areas of the plant. This proposed modification will provide the operators the ability to restore the RCIC system to service in the event the RCIC system is rendered inoperable for the reasons described previously as a result of a fire, and to provide for safe shutdown of the plant in accordance with the safe shutdown methods described in the Fire Protection Evaluation Report (FPER) for LGS.

The manual transfer switch box at the RSP will be locked closed. The position of the transfer switch will be indicated on a MCR panel, and will cause an alarm in the MCR when placed in the emergency position. The electrical Division 1 instantaneous breaker (the primary breaker) will be locked open. The keys to these locks will be under administrative control so that control of the manual transfer switch and the Division 1 primary breaker will be limited to, aside from testing and maintenance, procedure-directed operator discretion only in the event of a fire with concurrent loss of electrical Division 3 AC power.

The design of this proposed modification is such that physical independence of electrical systems and application of the single failure criterion will be maintained, with the exception that when the manual transfer switch is placed in the emergency position, normal Division 3 power and control cabling for the valve will become energized from an electrical Division 1 power source. The licensee is establishing appropriate restrictions for testing the operation of valve HV-49-1F007 and appropriate procedural controls on the manual transfer switch. These restrictions will limit the time that the electrical Division 1 power source is exposed to the electrical Division 3 wiring loads. They will also provide additional assurance that the two power divisions will not become interconnected.

The proposed modifications are acceptable to resolve the fire protection deficiencies, along with the associated changes to the TSs.

#### 4.0 ENVIRONMENTAL CONSIDERATION

This amendment involves 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. The 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 occupational radiation exposure. The Commission has previously issued a proposed finding that this amendment involves no significant hazards consideration and there has been no public comment on such finding.

Accordingly, this 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 nor environmental assessment need be prepared in connection with the issuance of this amendment.

#### 5.0 CONCLUSION

The Commission made a proposed determination that the amendment involves no significant hazards consideration which was published in the Federal Register (55 FR 26288) on June 27, 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, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributor: Dick Clark

Dated: September 19, 1990