

August 10, 1994

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

DESIGNATED ORIGINAL

Certified By PD I-2

Dear Mr. Hunger:

SUBJECT: FREQUENCY FOR SUBMITTING SEMIANNUAL RADIOACTIVE EFFLUENT RELEASE REPORT, LIMERICK GENERATING STATION, UNITS 1 AND 2 (TAC NOS. M89175 AND M89176)

The Commission has issued the enclosed Amendment No. 73 to Facility Operating License No. NPF-39 and Amendment No. 35 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 March 24, 1994.

These amendments revise TS Sections 3.11.1.4, 6.9.1.8, and 6.14.1, and TS Definition 1.24 to change the frequency for submitting the Semiannual Radioactive Effluent Release Report to the NRC from Semiannually to annually.

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

Enclosures:

- Amendment No. 73 to License No. NPF-39
Amendment No. 35 to License No. NPF-85
- Safety Evaluation

cc w/enclosures:
See next page

DISTRIBUTION:

Docket File	MO'Brien(2)	CGrimes, 11E21
NRC & Local PDRs	FRinaldi/JHarold	ACRS(10)
PDI-2 Reading	OGC	OPA
SVarga	DHagan, 3206	OC/LFDCB
JCalvo	GHill(4), P1-22	CAnderson, RGN-I
MCThadani(A)	EWenzinger, RGN-I	LCunningham

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*Previously Concurred

OFC	:PDI-2/LA	:PDI-2/PE	:PDI-2/PM	:PRPB*	:OGC*	:PDI-2/D(A):
NAME	:MO'Brien	:JHarold	:t/c:FRinaldi	:LCunningham	:CPW	:MCThadani :
DATE	:8/10/94	:8/19/94	:8/19/94	:07/12/94	:08/02/94	:8/9/94 :

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

August 10, 1994

Docket Nos. 50-352
and 50-353

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: FREQUENCY FOR SUBMITTING SEMIANNUAL RADIOACTIVE EFFLUENT RELEASE
REPORT, LIMERICK GENERATING STATION, UNITS 1 AND 2 (TAC NOS. M89175
AND M89176)

The Commission has issued the enclosed Amendment No. 73 to Facility Operating License No. NPF-39 and Amendment No. 35 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 March 24, 1994.

These amendments revise TS Sections 3.11.1.4, 6.9.1.8, and 6.14.1, and TS Definition 1.24 to change the frequency for submitting the Semiannual Radioactive Effluent Release Report to the NRC from Semiannually to annually.

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

Sincerely,

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

Enclosures:

1. Amendment No. 73 to License No. NPF-39
Amendment No. 35 to License No. NPF-85
2. Safety Evaluation

cc w/enclosures:
See next page

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

Limerick Generating Station,
Units 1 & 2

cc:

J. W. Durham, Sr., Esquire
Sr. V.P. & General Counsel
PECO Energy Company
2301 Market Street
Philadelphia, Pennsylvania 19101

Mr. Rich R. Janati, Chief
Division of Nuclear Safety
PA Dept. of Environmental Resources
P. O. Box 8469
Harrisburg, Pennsylvania 17105-8469

Mr. Dave Helker, 52A-5
PECO Energy Company
955 Chesterbrook Boulevard
Wayne, Pennsylvania 19087-5691

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

Mr. David R. Helwig, Vice President
Limerick Generating Station
Post Office Box A
Sanatoga, Pennsylvania 19464

Mr. James L. Kantner
Regulatory Engineer
Limerick Generating Station
P. O. Box A
Sanatoga, Pennsylvania 19464

Mr. Robert Boyce
Plant Manager
Limerick Generating Station
P.O. Box A
Sanatoga, Pennsylvania 19464

Library
US Nuclear Regulatory Commission
Region I
475 Allendale Road
King of Prussia, PA 19406

Regional Administrator
U.S. Nuclear Regulatory Commission
Region I
475 Allendale Road
King of Prussia, PA 19406

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

Mr. Neil S. Perry
Senior Resident Inspector
US Nuclear Regulatory Commission
P. O. Box 596
Pottstown, Pennsylvania 19464

Mr. John Doering, Chairman
Nuclear Review Board
PECO Energy Company
955 Chesterbrook Boulevard
Mail Code 63C-5
Wayne, Pennsylvania 19087

Mr. Craig L. Adams
Superintendent - Services
Limerick Generating Station
P.O. Box A
Sanatoga, Pennsylvania 19464



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. 73
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 24, 1994, 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.

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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. 73, 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



Mohan C. Thadani, Acting 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: August 10, 1994

ATTACHMENT TO LICENSE AMENDMENT NO. 73

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

Remove

Insert

1-3

1-3*

1-4

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3/4 11-7

3/4 11-7

3/4 11-8

3/4 11-8*

6-17

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6-22

DEFINITIONS

END-OF-CYCLE RECIRCULATION PUMP TRIP SYSTEM RESPONSE TIME

- 1.12 The END-OF-CYCLE RECIRCULATION PUMP TRIP SYSTEM RESPONSE TIME shall be that time interval to complete suppression of the electric arc between the fully open contacts of the recirculation pump circuit breaker from initial movement of the associated:
- Turbine stop valves, and
 - Turbine control valves.

This total system response time consists of two components, the instrumentation response time and the breaker arc suppression time. These times may be measured by any series of sequential, overlapping or total steps such that the entire response time is measured.

1.13 (Deleted)

1.14 (Deleted)

FREQUENCY NOTATION

- 1.15 The FREQUENCY NOTATION specified for the performance of Surveillance Requirements shall correspond to the intervals defined in Table 1.1.

HIGH (POWER) TRIP SETPOINT (HTSP)

- 1.15a The high power trip setpoint associated with the Rod Block Monitor (RBM) rod block trip setting applicable above 85% reactor thermal power.

IDENTIFIED LEAKAGE

- 1.16 IDENTIFIED LEAKAGE shall be:

- Leakage into collection systems, such as pump seal or valve packing leaks, that is captured and conducted to a sump or collecting tank, or
- Leakage into the containment atmosphere from sources that are both specifically located and known either not to interfere with the operation of the leakage detection systems or not to be PRESSURE BOUNDARY LEAKAGE.

INTERMEDIATE (POWER) TRIP SETPOINT (ITSP)

- 1.16a The intermediate power trip setpoint associated with the Rod Block Monitor (RBM) rod block trip setting applicable between 65% and 85% reactor thermal power.

ISOLATION SYSTEM RESPONSE TIME

- 1.17 The ISOLATION SYSTEM RESPONSE TIME shall be that time interval from when the monitored parameter exceeds its isolation actuation setpoint at the channel sensor until the isolation valves travel to their required positions. Times shall include diesel generator starting and sequence loading delays where applicable. The response time may be measured by any series of sequential, overlapping or total steps such that the entire response time is measured.

LIMITING CONTROL ROD PATTERN

- 1.18 A LIMITING CONTROL ROD PATTERN shall be a pattern which results in the core being on a thermal hydraulic limit, i.e., operating on a limiting value for APLHGR, LHGR, OR MCPR.

LINEAR HEAT GENERATION RATE

- 1.19 LINEAR HEAT GENERATION RATE (LHGR) shall be the heat generation per unit length of fuel rod. It is the integral of the heat flux over the heat transfer area associated with the unit length.

DEFINITIONS

LOGIC SYSTEM FUNCTIONAL TEST

1.20 A LOGIC SYSTEM FUNCTIONAL TEST shall be a test of all logic components, i.e., all relays and contacts, all trip units, solid state logic elements, etc, of a logic circuit, from sensor through and including the actuated device, to verify OPERABILITY. The LOGIC SYSTEM FUNCTIONAL TEST may be performed by any series of sequential, overlapping or total system steps such that the entire logic system is tested.

LOW (POWER) TRIP SETPOINT (LTSP)

1.20a The low power trip setpoint associated with the Rod Block Monitor (RBM) rod block trip setting applicable between 30% and 65% reactor thermal power.

1.21 (Deleted)

MEMBER(S) OF THE PUBLIC

1.22 MEMBER(S) OF THE PUBLIC shall include all persons who are not occupationally associated with the plant. This category does not include employees of the utility, its contractors, or vendors. Also excluded from this category are persons who enter the site to service equipment or to make deliveries. This category does include persons who use portions of the site for recreational, occupational, or other purposes not associated with the plant.

MAPFAC(F)-(MAPLHGR FLOW FACTOR)

1.22a A core flow dependent multiplication factor used to flow bias the standard Maximum Average Planar Linear Heat Generation Rate (MAPLHGR) limit.

MAPFAC(P)-(POWER DEPENDENT MAPLHGR MULTIPLIER)

1.22b A core power dependent multiplication factor used to power bias the standard Maximum Average Planar Linear Heat Generation Rate (MAPLHGR) limit.

MINIMUM CRITICAL POWER RATIO (MCPR)

1.23 The MINIMUM CRITICAL POWER RATIO (MCPR) shall be the smallest CPR which exists in the core (for each class of fuel). Associated with the minimum critical power ratio is a core flow dependent (MCPR(F)) and core power dependent (MCPR(P)) minimum critical power ratio.

OFFSITE DOSE CALCULATION MANUAL

1.24 The OFFSITE DOSE CALCULATION MANUAL (ODCM) shall contain the methodology and parameters used in the calculation of offsite doses resulting from radioactive gaseous and liquid effluents, in the calculation of gaseous and liquid effluent monitoring alarm/trip setpoints, and in the conduct of the Radiological Environmental Monitoring Program. The ODCM shall also contain (1) the Radioactive Effluent Controls and Radiological Environmental Monitoring Programs required by Section 6.8.4 and (2) descriptions of the information that should be included in the Annual Radiological Environmental Operating and Annual Radioactive Effluent Release Reports required by Specifications 6.9.1.7 and 6.9.1.8.

OPERABLE - OPERABILITY

1.25 A system, subsystem, train, component or device shall be OPERABLE or have OPERABILITY when it is capable of performing its specified function(s) and when all necessary attendant instrumentation, controls, electrical power, cooling or seal water, lubrication or other auxiliary equipment that are required for the system, subsystem, train, component, or device to perform its function(s) are also capable of performing their related support function(s).

RADIOACTIVE EFFLUENTS

LIQUID HOLDUP TANKS

LIMITING CONDITION FOR OPERATION

3.11.1.4 The quantity of radioactive material contained in any outside temporary tanks shall be limited to less than or equal to 10 curies, excluding tritium and dissolved or entrained noble gases.

APPLICABILITY: At all times.

ACTION:

- a. With the quantity of radioactive material in any of the above tanks exceeding the above limit, immediately suspend all additions of radioactive material to the tank and within 48 hours reduce the tank contents to within the limit and describe the events leading to this condition in the next Annual Radioactive Effluent Release Report.
- b. The provisions of Specification 3.0.3 are not applicable.

SURVEILLANCE REQUIREMENTS

4.11.1.4 The quantity of radioactive material contained in each of the above tanks shall be determined to be within the above limit by analyzing a representative sample of the tank's contents at least once per 7 days when radioactive materials are being added to the tank.

Section 3/4 11.2.1 through Section 3/4 11.2.4 (Deleted)

THE INFORMATION FROM THESE TECHNICAL SPECIFICATIONS SECTIONS HAS BEEN RELOCATED TO THE ODCM. TECHNICAL SPECIFICATIONS PAGES 3/4 11-9 THROUGH 3/4 11-14 OF THESE SECTIONS HAVE BEEN INTENTIONALLY OMITTED.

ADMINISTRATIVE CONTROLS

ANNUAL RADIOACTIVE EFFLUENT RELEASE REPORT*

6.9.1.8 The Annual Radioactive Effluent Release Report covering the operation of the unit during the previous 12 months of operation shall be submitted within 60 days after January 1 of each year. The report shall include a summary of the quantities of radioactive liquid and gaseous effluents and solid waste released from the unit. The material provided shall be (1) consistent with the objectives outlined in the ODCM and PCP and (2) in conformance with 10 CFR 50.36a and Section IV.B.1 of Appendix I to 10 CFR Part 50.

*A single submittal may be made for a multiple unit station. The submittal should combine those sections that are common to all units at the station.

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ADMINISTRATIVE CONTROLS

HIGH RADIATION AREA (Continued)

- b. A radiation monitoring device which continuously integrates the radiation dose rate in the area and alarms when a preset integrated dose is received. Entry into such areas with this monitoring device may be made after the dose rate levels in the area have been established and personnel have been made knowledgeable of them.
- c. A health physics qualified individual (i.e., qualified in radiation protection procedures) with a radiation dose rate monitoring device who is responsible for providing positive control over the activities within the area and shall perform periodic radiation surveillance at the frequency specified by the Health Physicist in the RWP.

6.12.2 In addition to the requirements of Specification 6.12.1, areas accessible to personnel with radiation levels such that a major portion of the body could receive in 1 hour a dose greater than 1000 mrem shall be provided with locked doors to prevent unauthorized entry, and the keys shall be maintained under the administrative control of Shift Supervision on duty and/or the health physics supervision. Doors shall remain locked except during periods of access by personnel under an approved RWP which shall specify the dose rate levels in the immediate work area and the maximum allowable stay time for individuals in that area. For individual areas accessible to personnel with radiation levels such that a major portion of the body could receive in 1 hour a dose in excess of 1000 mrem* that are located within large areas, such as the containment, where no enclosure exists for purposes of locking, and no enclosure can be reasonably constructed around the individual areas, then that area shall be roped off, conspicuously posted, and a flashing light shall be activated as a warning device. In lieu of the stay time specification of the RWP, continuous surveillance direct or remote (such as use of closed circuit TV cameras), may be made by personnel qualified in radiation protection procedures to provide positive exposure control over the activities within the area.

6.13 PROCESS CONTROL PROGRAM (PCP)

6.13.1 Changes to the PCP:

- a. Shall be documented and records of reviews performed shall be retained as required by Specification 6.10.3n. This documentation shall contain:
 - 1. Sufficient information to support the change together with the appropriate analyses or evaluations justifying the change(s) and

*Measurement made at 18 inches from source of radioactivity.

ADMINISTRATIVE CONTROLS

PROCESS CONTROL PROGRAM (Continued)

2. A determination that the change did not reduce the overall conformance of the solidified waste product to existing requirements of Federal, State, or other applicable regulations.
- b. Shall become effective upon review and acceptance by the PORC and approval of the Plant Manager.

6.14 OFFSITE DOSE CALCULATION MANUAL (ODCM)

6.14.1 Changes to the ODCM:

- a. Shall be documented and records of reviews performed shall be retained as required by Specification 6.10.3n. This documentation shall contain:
 1. Sufficient information to support the change together with the appropriate analyses or evaluations justifying the change(s) and
 2. A determination that the change will maintain the level of radioactive effluent control required by 10 CFR 20.106, 40 CFR Part 190, 10 CFR 50.36a, and Appendix I to 10 CFR Part 50 and not adversely impact the accuracy or reliability of effluent, dose, or setpoint calculations.
- b. Shall become effective upon review and acceptance by the PORC and the approval of the Plant Manager.
- c. Shall be submitted to the Commission in the form of a complete, legible copy of the entire ODCM as a part of or concurrent with the Annual Radioactive Effluent Release Report for the period of the report in which any change to the ODCM was made. Each change shall be identified by markings in the margin of the affected pages, clearly indicating the area of the page that was changed, and shall indicate the date (e.g., month/year) the change was implemented.

6.15 (Deleted) - INFORMATION FROM THIS SECTION RELOCATED TO THE ODCM.



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

PHILADELPHIA ELECTRIC COMPANY

DOCKET NO. 50-353

LIMERICK GENERATING STATION, UNIT 2

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 35
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 24, 1994, 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. 35, 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



Mohan C. Thadani, Acting 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: August 10, 1994

ATTACHMENT TO LICENSE AMENDMENT NO. 35

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 pages are provided to maintain document completeness.*

Remove

Insert

1-3

1-3*

1-4

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3/4 11-7

3/4 11-7

3/4 11-8

3/4 11-8*

6-17

6-17

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6-22

DEFINITIONS

This total system response time consists of two components, the instrumentation response time and the breaker arc suppression time. These times may be measured by any series of sequential, overlapping or total steps such that the entire response time is measured.

FRACTION OF LIMITING POWER DENSITY

- 1.13 The FRACTION OF LIMITING POWER DENSITY (FLPD) shall be the LHGR existing at a given location divided by the specified LHGR limit for that bundle type.

FRACTION OF RATED THERMAL POWER

- 1.14 The FRACTION OF RATED THERMAL POWER (F RTP) shall be the measured THERMAL POWER divided by the RATED THERMAL POWER.

FREQUENCY NOTATION

- 1.15 The FREQUENCY NOTATION specified for the performance of Surveillance Requirements shall correspond to the intervals defined in Table 1.1.

IDENTIFIED LEAKAGE

- 1.16 IDENTIFIED LEAKAGE shall be:

- a. Leakage into collection systems, such as pump seal or valve packing leaks, that is captured and conducted to a sump or collecting tank, or
- b. Leakage into the containment atmosphere from sources that are both specifically located and known either not to interfere with the operation of the leakage detection systems or not to be PRESSURE BOUNDARY LEAKAGE.

ISOLATION SYSTEM RESPONSE TIME

- 1.17 The ISOLATION SYSTEM RESPONSE TIME shall be that time interval from when the monitored parameter exceeds its isolation actuation setpoint at the channel sensor until the isolation valves travel to their required positions. Times shall include diesel generator starting and sequence loading delays where applicable. The response time may be measured by any series of sequential, overlapping or total steps such that the entire response time is measured.

LIMITING CONTROL ROD PATTERN

- 1.18 A LIMITING CONTROL ROD PATTERN shall be a pattern which results in the core being on a thermal hydraulic limit, i.e., operating on a limiting value for APLHGR, LHGR, or MCPR.

LINEAR HEAT GENERATION RATE

- 1.19 LINEAR HEAT GENERATION RATE (LHGR) shall be the heat generation per unit length of fuel rod. It is the integral of the heat flux over the heat transfer area associated with the unit length.

DEFINITIONS

LOGIC SYSTEM FUNCTIONAL TEST

1.20 A LOGIC SYSTEM FUNCTIONAL TEST shall be a test of all logic components, i.e., all relays and contacts, all trip units, solid state logic elements, etc, of a logic circuit, from sensor through and including the actuated device, to verify OPERABILITY. The LOGIC SYSTEM FUNCTIONAL TEST may be performed by any series of sequential, overlapping or total system steps such that the entire logic system is tested.

MAXIMUM FRACTION OF LIMITING POWER DENSITY

1.21 The MAXIMUM FRACTION OF LIMITING POWER DENSITY (MFLPD) shall be the highest value of the FLPD which exists in the core.

MEMBER(S) OF THE PUBLIC

1.22 MEMBER(S) OF THE PUBLIC shall include all persons who are not occupationally associated with the plant. This category does not include employees of the utility, its contractors, or vendors. Also excluded from this category are persons who enter the site to service equipment or to make deliveries. This category does include persons who use portions of the site for recreational, occupational, or other purposes not associated with the plant.

MINIMUM CRITICAL POWER RATIO

1.23 The MINIMUM CRITICAL POWER RATIO (MCPR) shall be the smallest CPR which exists in the core (for each class of fuel).

OFFSITE DOSE CALCULATION MANUAL

1.24 The OFFSITE DOSE CALCULATION MANUAL (ODCM) shall contain the methodology and parameters used in the calculation of offsite doses resulting from radioactive gaseous and liquid effluents, in the calculation of gaseous and liquid effluent monitoring alarm/trip setpoints, and in the conduct of the Radiological Environmental Monitoring Program. The ODCM shall also contain (1) the Radioactive Effluent Controls and Radiological Environmental Monitoring Programs required by Section 6.8.4 and (2) descriptions of the information that should be included in the Annual Radiological Environmental Operating and Annual Radioactive Effluent Release Reports required by Specifications 6.9.1.7 and 6.9.1.8.

OPERABLE - OPERABILITY

1.25 A system, subsystem, train, component or device shall be OPERABLE or have OPERABILITY when it is capable of performing its specified function(s) and when all necessary attendant instrumentation, controls, electrical power, cooling or seal water, lubrication or other auxiliary equipment that are required for the system, subsystem, train, component, or device to perform its function(s) are also capable of performing their related support function(s).

OPERATIONAL CONDITION - CONDITION

1.26 An OPERATIONAL CONDITION, i.e., CONDITION, shall be any one inclusive combination of mode switch position and average reactor coolant temperature as specified in Table 1.2.

PHYSICS TESTS

1.27 PHYSICS TESTS shall be those tests performed to measure the fundamental nuclear characteristics of the reactor core and related instrumentation and (1) described in Chapter 14 of the FSAR, (2) authorized under the provisions of 10 CFR 50.59, or (3) otherwise approved by the Commission.

RADIOACTIVE EFFLUENTS

LIQUID HOLDUP TANKS

LIMITING CONDITION FOR OPERATION

3.11.1.4 The quantity of radioactive material contained in any outside temporary tanks shall be limited to less than or equal to 10 curies, excluding tritium and dissolved or entrained noble gases.

APPLICABILITY: At all times.

ACTION:

- a. With the quantity of radioactive material in any of the above tanks exceeding the above limit, immediately suspend all additions of radioactive material to the tank and within 48 hours reduce the tank contents to within the limit and describe the events leading to this condition in the next Annual Radioactive Effluent Release Report.
- b. The provisions of Specification 3.0.3 are not applicable.

SURVEILLANCE REQUIREMENTS

4.11.1.4 The quantity of radioactive material contained in each of the above tanks shall be determined to be within the above limit by analyzing a representative sample of the tank's contents at least once per 7 days when radioactive materials are being added to the tank.

Section 3/4 11.2.1 through Section 3/4 11.2.4 (Deleted)

THE INFORMATION FROM THESE TECHNICAL
SPECIFICATIONS SECTIONS HAS BEEN
RELOCATED TO THE ODCM. TECHNICAL
SPECIFICATIONS PAGES 3/4 11-9 THROUGH
3/4 11-14 OF THESE SECTIONS HAVE
BEEN INTENTIONALLY OMITTED.

ADMINISTRATIVE CONTROLS

ANNUAL RADIOACTIVE EFFLUENT RELEASE REPORT*

6.9.1.8 The Annual Radioactive Effluent Release Report covering the operation of the unit during the previous 12 months of operation shall be submitted within 60 days after January 1 of each year. The initial report shall be submitted during first report period, as described above, following initial criticality. The report shall include a summary of the quantities of radioactive liquid and gaseous effluents and solid waste released from the unit. The material provided shall be (1) consistent with the objectives outlined in the ODCM and PCP and (2) in conformance with 10 CFR 50.36a and Section IV.B.1 of Appendix I to 10 CFR Part 50.

*A single submittal may be made for a multiple unit station. The submittal should combine those sections that are common to all units at the station.

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ADMINISTRATIVE CONTROLS

HIGH RADIATION AREA (Continued)

- b. A radiation monitoring device which continuously integrates the radiation dose rate in the area and alarms when a preset integrated dose is received. Entry into such areas with this monitoring device may be made after the dose rate levels in the area have been established and personnel have been made knowledgeable of them.
- c. A health physics qualified individual (i.e., qualified in radiation protection procedures) with a radiation dose rate monitoring device who is responsible for providing positive control over the activities within the area and shall perform periodic radiation surveillance at the frequency specified by the Health Physicist in the RWP.

6.12.2 In addition to the requirements of Specification 6.12.1, areas accessible to personnel with radiation levels such that a major portion of the body could receive in 1 hour a dose greater than 1000 mrem shall be provided with locked doors to prevent unauthorized entry, and the keys shall be maintained under the administrative control of Shift Supervision on duty and/or the health physics supervision. Doors shall remain locked except during periods of access by personnel under an approved RWP which shall specify the dose rate levels in the immediate work area and the maximum allowable stay time for individuals in that area. For individual areas accessible to personnel with radiation levels such that a major portion of the body could receive in 1 hour a dose in excess of 1000 mrem* that are located within large areas, such as the containment, where no enclosure exists for purposes of locking, and no enclosure can be reasonably constructed around the individual areas, then that area shall be roped off, conspicuously posted, and a flashing light shall be activated as a warning device. In lieu of the stay time specification of the RWP, continuous surveillance direct or remote (such as use of closed circuit TV cameras), may be made by personnel qualified in radiation protection procedures to provide positive exposure control over the activities within the area.

6.13 PROCESS CONTROL PROGRAM (PCP)

6.13.1 Changes to the PCP:

- a. Shall be documented and records of reviews performed shall be retained as required by Specification 6.10.3n. This documentation shall contain:
 - 1. Sufficient information to support the change together with the appropriate analyses or evaluations justifying the change(s) and

*Measurement made at 18 inches from source of radioactivity.

ADMINISTRATIVE CONTROLS

PROCESS CONTROL PROGRAM (Continued)

2. A determination that the change did not reduce the overall conformance of the solidified waste product to existing requirements of Federal, State, or other applicable regulations.
- b. Shall become effective upon review and acceptance by the PORC and approval of the Plant Manager.

6.14 OFFSITE DOSE CALCULATION MANUAL (ODCM)

6.14.1 Changes to the ODCM:

- a. Shall be documented and records of reviews performed shall be retained as required by Specification 6.10.3n. This documentation shall contain:
 1. Sufficient information to support the change together with the appropriate analyses or evaluations justifying the change(s) and
 2. A determination that the change will maintain the level of radioactive effluent control required by 10 CFR 20.106, 40 CFR Part 190, 10 CFR 50.36a, and Appendix I to 10 CFR Part 50 and not adversely impact the accuracy or reliability of effluent, dose, or setpoint calculations.
- b. Shall become effective upon review and acceptance by the PORC and the approval of the Plant Manager.
- c. Shall be submitted to the Commission in the form of a complete, legible copy of the entire ODCM as a part of or concurrent with the Annual Radioactive Effluent Release Report for the period of the report in which any change to the ODCM was made. Each change shall be identified by markings in the margin of the affected pages, clearly indicating the area of the page that was changed, and shall indicate the date (e.g., month/year) the change was implemented.

6.15 (Deleted) - INFORMATION FROM THIS SECTION RELOCATED TO THE ODCM.



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NOS. 73 AND 35 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 24, 1994, the Philadelphia Electric Company (the licensee) submitted a request for changes to the Limerick Generating Station (LGS), Units 1 and 2, Technical Specifications (TS). The requested changes would revise TS Sections 3.11.1.4, 6.9.1.8, and 6.14.1, and TS Definition 1.24 to change the frequency for submitting the Semiannual Radioactive Effluent Release Report to the NRC from Semiannually to annually.

2.0 EVALUATION

Currently, the TS for LGS require that the Radioactive Effluent Release Report be submitted for staff review every 6 months. On August 19, 1992, the NRC issued the Final Rule, "Reducing the Regulatory Burden on Nuclear Licensees," published in the Federal Register on August 31, 1992, which revised 10 CFR 50.36a to require that each licensee submit to the Commission a report specifying the quantity of each of the principal radionuclides released to unrestricted areas during the previous 12 months.

The staff concluded that the TS changes are consistent with 10 CFR 50.36a. Therefore, the staff finds the changes 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 relate to changes in recordkeeping, or administrative procedures or requirements. Accordingly, the amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(10). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of this 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 amendments will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributors: J. Harold
F. Rinaldi

Date: August 10, 1994