

January 27, 1995

Mr. George A. Hunger,
Director-Licensing, MC-62A-1
PECO Energy Company
Nuclear Group Headquarters
Correspondence Control Desk
P.O. Box No. 195
Wayne, PA 19087-0195

SUBJECT: REMOVE TEMPERATURE REQUIREMENT FOR OPERATIONAL CONDITION 5, LIMERICK GENERATING STATION, UNITS 1 AND 2 (TAC NOS. M90375/M90376 AND M90518/M90519)

Dear Mr. Hunger:

The Commission has issued the enclosed Amendment No. 88 to Facility Operating License No. NPF-39 and Amendment No. 50 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 (TS) in response to one item in your application dated August 31, 1994. There are five remaining items to this application.

These amendments address Section 5, "Remove Temperature Requirement for Operational Condition 5" (TSCR 94-44-0), by revising TS Table 1.2 and TS Bases 3/4.9.11 to remove the average reactor coolant temperature requirement in Operational Condition (OPCON) 5, Refueling.

A copy of our Safety Evaluation is also enclosed. Notice of Issuance will be included in the Commission's biweekly Federal Register notice. Please notify the staff, in writing, when these TS amendments have been implemented.

Sincerely,
/s/

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

Docket Nos. 50-352/50-353

Enclosures:

- 1. Amendment No. 88 to License No. NPF-39
Amendment No. 50 to License No. NPF-85
- 2. Safety Evaluation

cc w/encls:

See next page

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UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

January 27, 1995

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Director-Licensing, MC 62A-1
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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

Docket Nos. 50-352/50-353

Enclosures:

1. Amendment No. 88 to
License No. NPF-39
Amendment No. 50 to
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2. Safety Evaluation

cc w/encls:
See next page

Mr. George A. Hunger, Jr.
PECO Energy 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. 88
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 31, 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. 88, 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 and shall be implemented within 30 days.

FOR THE NUCLEAR REGULATORY COMMISSION



for

John F. Stolz, 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 27, 1995

ATTACHMENT TO LICENSE AMENDMENT NO. 88

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.

Remove

1-10

B 3/4 9-2

Insert

1-10

B 3/4 9-2

DEFINITIONS

TABLE 1.2
OPERATIONAL CONDITIONS

<u>CONDITION</u>	<u>MODE SWITCH POSITION</u>	<u>AVERAGE REACTOR COOLANT TEMPERATURE</u>
1. POWER OPERATION	Run	Any temperature
2. STARTUP	Startup/Hot Standby	Any temperature
3. HOT SHUTDOWN	Shutdown# ***	> 200°F
4. COLD SHUTDOWN	Shutdown# ## ***	≤ 200°F
5. REFUELING*	Shutdown or Refuel** #	NA

#The reactor mode switch may be placed in the Run or Startup/Hot Standby position to test the switch interlock functions provided that the control rods are verified to remain fully inserted by a second licensed operator or other technically qualified member of the unit technical staff.

##The reactor mode switch may be placed in the Refuel position while a single control rod drive is being removed from the reactor pressure vessel per Specification 3.9.10.1.

*Fuel in the reactor vessel with the vessel head closure bolts less than fully tensioned or with the head removed.

**See Special Test Exceptions 3.10.1 and 3.10.3.

***The reactor mode switch may be placed in the Refuel position while a single control rod is being recoupled provided that the one-rod-out interlock is OPERABLE.

REFUELING OPERATIONS

BASES

3/4.9.6 REFUELING PLATFORM

The OPERABILITY requirements ensure that (1) the refueling platform will be used for handling control rods and fuel assemblies within the reactor pressure vessel, (2) each hoist has sufficient load capacity for handling fuel assemblies and control rods, (3) the core internals and pressure vessel are protected from excessive lifting force in the event they are inadvertently engaged during lifting operations, and (4) inadvertent criticality will not occur due to fuel being loaded into a unrodded cell.

3/4.9.7 CRANE TRAVEL - SPENT FUEL STORAGE POOL

The restriction on movement of loads in excess of the nominal weight of a fuel assembly and associated lifting device over other fuel assemblies in the storage pool ensures that in the event this load is dropped 1) the activity release will be limited to that contained in a single fuel assembly, and 2) any possible distortion of fuel in the storage racks will not result in a critical array. This assumption is consistent with the activity release assumed in the safety analyses.

3/4.9.8 and 3/4.9.9 WATER LEVEL - REACTOR VESSEL and WATER LEVEL - SPENT FUEL STORAGE POOL

The restrictions on minimum water level ensure that sufficient water depth is available to remove 99% of the assumed 10% iodine gap activity released from the rupture of an irradiated fuel assembly. This minimum water depth is consistent with the assumptions of the accident analysis.

3/4.9.10 CONTROL ROD REMOVAL

These specifications ensure that maintenance or repair of control rods or control rod drives will be performed under conditions that limit the probability of inadvertent criticality. The requirements for simultaneous removal of more than one control rod are more stringent since the SHUTDOWN MARGIN specification provides for the core to remain subcritical with only one control rod fully withdrawn.

3/4.9.11 RESIDUAL HEAT REMOVAL AND COOLANT CIRCULATION

The requirements that at least one residual heat removal loop be OPERABLE or that an alternate method capable of decay heat removal be demonstrated and that an alternate method of coolant mixing be in operation ensures that 1) sufficient cooling capacity is available to remove decay heat and maintain the water in the reactor pressure vessel below 140°F, and 2) sufficient coolant circulation would be available through the reactor core to assure accurate temperature indication and to distribute and prevent stratification of the poison in the event it becomes necessary to actuate the standby liquid control system.

The requirement to have two shutdown cooling mode loops OPERABLE when there is less than 22 feet of water above the reactor vessel flange ensures that a single failure of the operating loop will not result in a complete loss of residual heat removal capability. With the reactor vessel head removed and 22 feet of water above the reactor vessel flange, a large heat sink is available for core cooling. Thus, in the event a failure of the operating RHR loop, adequate time is provided to initiate alternate methods capable of decay heat removal or emergency procedures to cool the core.



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. 50
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 August 31, 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. 50, 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 and shall be implemented within 30 days.

FOR THE NUCLEAR REGULATORY COMMISSION



FOR

John F. Stolz, 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 27, 1995

ATTACHMENT TO LICENSE AMENDMENT NO. 50

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.

Remove

1-10

B 3/4 9-2

Insert

1-10

B 3/4 9-2

TABLE 1.2
OPERATIONAL CONDITIONS

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5. REFUELING *	Shutdown or Refuel** #	NA

#The reactor mode switch may be placed in the Run or Startup/Hot Standby position to test the switch interlock functions provided that the control rods are verified to remain fully inserted by a second licensed operator or other technically qualified member of the unit technical staff.

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*Fuel in the reactor vessel with the vessel head closure bolts less than fully tensioned or with the head removed.

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REFUELING OPERATIONS

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The OPERABILITY requirements ensure that (1) the refueling platform will be used for handling control rods and fuel assemblies within the reactor pressure vessel, (2) each hoist has sufficient load capacity for handling fuel assemblies and control rods, (3) the core internals and pressure vessel are protected from excessive lifting force in the event they are inadvertently engaged during lifting operations, and (4) inadvertent criticality will not occur due to fuel being loaded into a unrodded cell.

3/4.9.7 CRANE TRAVEL - SPENT FUEL STORAGE POOL

The restriction on movement of loads in excess of the nominal weight of a fuel assembly and associated lifting device over other fuel assemblies in the storage pool ensures that in the event this load is dropped 1) the activity release will be limited to that contained in a single fuel assembly, and 2) any possible distortion of fuel in the storage racks will not result in a critical array. This assumption is consistent with the activity release assumed in the safety analyses.

3/4.9.8 and 3/4.9.9 WATER LEVEL - REACTOR VESSEL and WATER LEVEL - SPENT FUEL STORAGE POOL

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These specifications ensure that maintenance or repair of control rods or control rod drives will be performed under conditions that limit the probability of inadvertent criticality. The requirements for simultaneous removal of more than one control rod are more stringent since the SHUTDOWN MARGIN specification provides for the core to remain subcritical with only one control rod fully withdrawn.

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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NOS. 88 AND 50 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 August 31, 1994, the Philadelphia Electric Company (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 Table 1.2 and TS Bases 3/4.9.11 to remove the average reactor coolant temperature requirement in Operational Condition (OPCON) 5, Refueling. These amendments address Section 5 of the licensee's August 31, 1994 submittal, "Remove Temperature Requirement for Operational Condition 5." There are five remaining items to this application.

2.0 EVALUATION

The licensee proposed to change the average reactor coolant temperature requirement from " $\leq 140^{\circ}\text{F}$ " to "N/A" for the definition of OPCON 5 in TS Table 1.2. The licensee stated that this change would eliminate the confusion as to which OPCON is applicable if the reactor coolant temperature exceeds 140°F with the reactor pressure vessel head removed. Current TS requirement could be interpreted that a temperature greater than 140 degrees Fahrenheit would imply that the unit is no longer in OPCON 5; however, the unit is clearly not in OPCON 4. To reflect this change, the licensee proposed to revise TS Bases 3.4.9.11, "Residual Heat Removal and Coolant Circulation," to eliminate the reference to the OPCON 5 temperature requirement of 140°F .

The licensee reviewed the potential effect on reactor coolant system materials as a result of eliminating the temperature requirement in OPCON 5, and determined that the material fracture toughness analysis or reduction in the protection against non-ductile failure will not be affected. In addition, the licensee performed an evaluation for the potential increased temperature effects on adequate shutdown margin, and determined that the potential increase in temperature between 140°F and 200°F , staying below OPCON 4, would have a conservative and negligible effect on shutdown margin.

The staff agrees with the licensee's justification for change, and that the changes reflect the requirements delineated in NUREG-1433, "Standard Technical Specifications, General Electric Plants, BWR/4," including Table 1.1-1, Modes,

and B 3.9.8, Residual Heat Removal (RHR) - High Water Level. Hence, the staff concludes that the changes to TS Table 1.2 and TS Bases 3.4.9.11 reflect the removal of temperature requirement in OPCON 5, Refueling, is 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. 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 (59 FR 55884). 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.

Principal Contributor: T. Liu

Date: January 27, 1995