

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

Dear Mr. Hunger:

These amendments raise the Steam Leakage Detection system set-points that isolate the High Pressure Coolant Injection system (HPCI) and Reactor Core Isolation Cooling (RCIC) system equipment on high equipment room temperature and high delta temperature. The amendments are supported by a Limerick Generating Station modification to increase the environmental qualifications limits of the HPCI and RCIC systems to allow the systems to remain operable when equipment room cooling is unavailable.

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

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PDR ADOCK 05000352
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Enclosures:

- cc w/enc1s: See next page

Docket File	MO'Brien	CGrimes
PUBLIC	FRinaldi/JShea	WLong
PDI-2 Reading	OGC	ACRS(4)
SVarga	TLiu	OPA
JZwolinski	CAnderson, RGN-I	OC/LFDCB
JStolz		

OFC	:PDI-2/LA	:PDI-2/PM	:PDI-2/PM	:OGC	:PDI-2/D
NAME	:MO'Brien	:TKTurb	:FRFaldi	:GKOWEN	:JStolz
DATE	:12/12/94	:12/12/94	:12/14/94	:2/23/94	:1/94

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UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

January 20, 1995

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

SUBJECT: STEAM LEAKAGE DETECTION SYSTEM SETPOINTS, LIMERICK GENERATING
STATION, UNITS 1 AND 2 (TAC NOS. M89956 AND M89957)

Dear Mr. Hunger:

The Commission has issued the enclosed Amendment No. 85 to Facility Operating License No. NPF-39 and Amendment No. 46 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 your application dated July 20, 1994, as supplemented September 23, 1994.

These amendments raise the Steam Leakage Detection system set-points that isolate the High Pressure Coolant Injection system (HPCI) and Reactor Core Isolation Cooling (RCIC) system equipment on high equipment room temperature and high delta temperature. The amendments are supported by a Limerick Generating Station modification to increase the environmental qualifications limits of the HPCI and RCIC systems to allow the systems to remain operable when equipment room cooling is unavailable.

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, reading "Frank Rinaldi", is positioned above the typed name.

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

Docket Nos. 50-352/353

Enclosures:

1. Amendment No. 85 to
License No. NPF-39
Amendment No. 46 to
License No. NPF-85
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. 85
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 July 20, 1994, as supplemented on September 23, 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.

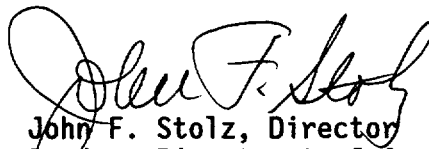
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.(2) of Facility Operating License No. NPF-39 is hereby amended to read as follows:

Technical Specifications

The Technical Specifications contained in Appendix A and the Environmental Protection Plan contained in Appendix B, as revised through Amendment No. 85, 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



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 20, 1995

ATTACHMENT TO LICENSE AMENDMENT NO. 85

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

3/4 3-19

3/4 3-20

Insert

3/4 3-19

3/4 3-20

TABLE 3.3.2-2 (Continued)

ISOLATION ACTUATION INSTRUMENTATION SETPOINTS

<u>TRIP FUNCTION</u>	<u>TRIP SETPOINT</u>	<u>ALLOWABLE VALUE</u>
3. <u>REACTOR WATER CLEANUP SYSTEM ISOLATION</u>		
a. RWCS Δ Flow - High	≤ 54.9 gpm	≤ 65.2 gpm
b. RWCS Area Temperature - High	$\leq 135^{\circ}\text{F}$ or 122°F^{**}	$\leq 145^{\circ}\text{F}$ or 130°F^{**}
c. RWCS Area Ventilation Δ Temperature - High	$\leq 32^{\circ}\text{F}$	$\leq 40^{\circ}\text{F}$
d. SLCS Initiation	N.A.	N.A.
e. Reactor Vessel Water Level - Low, Low, - Level 2	≥ -38 inches *	≥ -45 inches
f. Manual Initiation	N.A.	N.A.
4. <u>HIGH PRESSURE COOLANT INJECTION SYSTEM ISOLATION</u>		
a. HPCI Steam Line Δ Pressure - High	≤ 343 " H_2O	≤ 358 " H_2O
b. HPCI Steam Supply Pressure - Low	≥ 100 psig	≥ 90 psig
c. HPCI Turbine Exhaust Diaphragm Pressure - High	≤ 10 psig	≤ 20 psig
d. HPCI Equipment Room Temperature - High	225°F	$\geq 218^{\circ}\text{F}, \leq 247^{\circ}\text{F}$
e. HPCI Equipment Room Δ Temperature - High	$\leq 126^{\circ}\text{F}$	$\leq 130.5^{\circ}\text{F}$
f. HPCI Pipe Routing Area Temperature - High	175°F	$\geq 165^{\circ}\text{F}, \leq 200^{\circ}\text{F}$
g. Manual Initiation	N.A.	N.A.
h. HPCI Steam Line Δ Pressure - Timer	$3 \leq \tau \leq 12.5$ seconds	$2.5 \leq \tau \leq 13$ seconds

TABLE 3.3.2-2 (Continued)

ISOLATION ACTUATION INSTRUMENTATION SETPOINTS

<u>TRIP FUNCTION</u>	<u>TRIP SETPOINT</u>	<u>ALLOWABLE VALUE</u>
5. <u>REACTOR CORE ISOLATION COOLING SYSTEM ISOLATION</u>		
a. RCIC Steam Line Δ Pressure - High	$\leq 213'' \text{ H}_2\text{O}$	$\leq 223'' \text{ H}_2\text{O}$
b. RCIC Steam Supply Pressure - Low	$\geq 64.5 \text{ psig}$	$\geq 56.5 \text{ psig}$
c. RCIC Turbine Exhaust Diaphragm Pressure - High	$\leq 10.0 \text{ psig}$	$\leq 20.0 \text{ psig}$
d. RCIC Equipment Room Temperature - High	205°F	$\geq 198^\circ\text{F}, \leq 227^\circ\text{F}$
e. RCIC Equipment Room Δ Temperature - High	$\leq 109^\circ\text{F}$	$\leq 113.5^\circ\text{F}$
f. RCIC Pipe Routing Area Temperature - High	175°F	$\geq 165^\circ\text{F}, \leq 200^\circ\text{F}$
g. Manual Initiation	N.A.	N.A.
h. RCIC Steam Line Δ Pressure Timer	$3 \leq \tau \leq 12.5 \text{ seconds}$	$2.5 \leq \tau \leq 13 \text{ seconds}$



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. 46
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 July 20, 1994, as supplemented on September 23, 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.

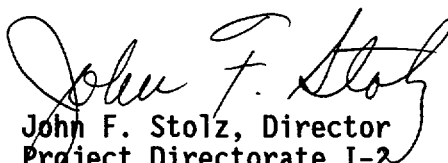
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.(2) of Facility Operating License No. NPF-85 is hereby amended to read as follows:

Technical Specifications

The Technical Specifications contained in Appendix A and the Environmental Protection Plan contained in Appendix B, as revised through Amendment No. 46 , 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



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 20, 1995

ATTACHMENT TO LICENSE AMENDMENT NO. 46

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

3/4 3-19

3/4 3-20

Insert

3/4 3-19

3/4 3-20

TABLE 3.3.2-2 (Continued)

ISOLATION ACTUATION INSTRUMENTATION SETPOINTS

<u>TRIP FUNCTION</u>	<u>TRIP SETPOINT</u>	<u>ALLOWABLE VALUE</u>
3. <u>REACTOR WATER CLEANUP SYSTEM ISOLATION</u>		
a. RWCS Δ Flow - High	≤ 54.9 gpm	≤ 65.2 gpm
b. RWCS Area Temperature - High	$\leq 135^{\circ}\text{F}$ or 122°F^{**}	$\leq 145^{\circ}\text{F}$ or 130°F^{**}
c. RWCS Area Ventilation Δ Temperature - High	$\leq 32^{\circ}\text{F}$	$\leq 40^{\circ}\text{F}$
d. SLCS Initiation	N.A.	N.A.
e. Reactor Vessel Water Level - Low, Low, - Level 2	≥ -38 inches *	≥ -45 inches
f. Manual Initiation	N.A.	N.A.
4. <u>HIGH PRESSURE COOLANT INJECTION SYSTEM ISOLATION</u>		
a. HPCI Steam Line Δ Pressure - High	≤ 343 " H ₂ O	≤ 358 " H ₂ O
b. HPCI Steam Supply Pressure - Low	≥ 100 psig	≥ 90 psig
c. HPCI Turbine Exhaust Diaphragm Pressure - High	≤ 10 psig	≤ 20 psig
d. HPCI Equipment Room Temperature - High	225°F	$\geq 218^{\circ}\text{F}$, $\leq 247^{\circ}\text{F}$
e. HPCI Equipment Room Δ Temperature - High	$\leq 126^{\circ}\text{F}$	$\leq 130.5^{\circ}\text{F}$
f. HPCI Pipe Routing Area Temperature - High	175°F	$\geq 165^{\circ}\text{F}$, $\leq 200^{\circ}\text{F}$
g. Manual Initiation	N.A.	N.A.
h. HPCI Steam Line Δ Pressure - Timer	$3 \leq \tau \leq 12.5$ seconds	$2.5 \leq \tau \leq 13$ seconds

TABLE 3.3.2-2 (Continued)

ISOLATION ACTUATION INSTRUMENTATION SETPOINTS

<u>TRIP FUNCTION</u>	<u>TRIP SETPOINT</u>	<u>ALLOWABLE VALUE</u>
5. <u>REACTOR CORE ISOLATION COOLING SYSTEM ISOLATION</u>		
a. RCIC Steam Line Δ Pressure - High	$\leq 213'' \text{ H}_2\text{O}$	$\leq 223'' \text{ H}_2\text{O}$
b. RCIC Steam Supply Pressure - Low	$\geq 64.5 \text{ psig}$	$\geq 56.5 \text{ psig}$
c. RCIC Turbine Exhaust Diaphragm Pressure - High	$\leq 10.0 \text{ psig}$	$\leq 20.0 \text{ psig}$
d. RCIC Equipment Room Temperature - High	205°F	$\geq 198^\circ\text{F}, \leq 227^\circ\text{F}$
e. RCIC Equipment Room Δ Temperature - High	$\leq 109^\circ\text{F}$	$\leq 113.5^\circ\text{F}$
f. RCIC Pipe Routing Area Temperature - High	175°F	$\geq 165^\circ\text{F}, \leq 200^\circ\text{F}$
g. Manual Initiation	N.A.	N.A.
h. RCIC Steam Line Δ Pressure Timer	$3 \leq \tau \leq 12.5 \text{ seconds}$	$2.5 \leq \tau \leq 13 \text{ seconds}$



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NOS. 85 AND 46 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 July 20, 1994, as supplemented September 23, 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 supplement provided additional information that did not change the initial no significant hazards consideration determination. The proposed changes would revise the Steam Leakage Detection System high area temperature instrument setpoints for the High Pressure Coolant Injection (HPCI) equipment room and Reactor Core Isolation Cooling (RCIC) equipment room. The licensee's objective is to eliminate the HPCI and RCIC systems' dependence on equipment room cooling. This will enable the HPCI and RCIC systems to be considered operable in the event of loss of Emergency Service Water supply to their respective equipment room coolers.

2.0 EVALUATION

HPCI and RCIC Steam Leakage Detection System: Steam lines containing steam at reactor pressure are routed from the main steam system inside containment to the HPCI and RCIC pump turbines located outside the primary containment in the HPCI and RCIC equipment rooms. These steam lines are provided with steam leakage detection instrumentation and containment isolation valves which provide for automatic isolation in the event of a steam line break in the equipment rooms or pipe chase. The leakage detection systems (LDSs) are described in FSAR Section 7.6.1.3.3. The LDS instruments monitor:

(a) equipment room temperatures, (b) equipment area vent air differential temperatures, (c) steam line flow, (d) steam line pressure, (e) pipe chase area temperatures and (f) HPCI and RCIC pump turbine exhaust diaphragm pressures. The selection of monitored variables provides diversity for detection of a wide spectrum of break sizes and locations under various ambient conditions. It is the (a) and (b) detection sensors that would be affected by the proposed amendment. The LDS provides initiation signals to isolation systems as described in FSAR Section 7.3.1.1.2.4. Automatic isolation ensures that: (a) in the event of a line break, the radiological dose consequences to the public and to the control room will not exceed acceptable limits and (b) the environmental conditions (temperature, pressure, dynamic forces, flooding, etc.) to which other safety-related systems, structures and equipment are exposed will not render them inoperable.

Table 3.3.2-2 of the LGS Technical Specifications specifies the temperature detection setpoints and allowable values for the steam leakage detection instruments serving the HPCI equipment room and the RCIC equipment room steam leakage detection systems.

Temperature detection alarm setpoints for the HPCI and RCIC equipment rooms would not be affected by the proposed amendment.

Design Basis for LDS: Instruments: NUREG-1433, "Standard Technical Specifications - General Electric Plants BWR/4," states that the design basis of equipment area leakage detection instruments is to detect steam leakage equivalent to 25 gpm. The 25 gpm criterion has been long-used as an assumed leakage rate when analyzing the design of leakage detection systems for secondary containment equipment rooms in BWR facilities.

HPCI and RCIC Equipment Room Cooling: The HPCI and RCIC equipment rooms are each provided with two 100% capacity unit coolers, one lead and one standby. The RCIC equipment room unit coolers are respectively served by the A loop of the Emergency Service Water (ESW) system and the HPCI equipment room coolers are served by the B ESW loop. The unit coolers are considered required support equipment for the HPCI and RCIC systems because loss of room cooling would result in room temperatures exceeding the conditions for which the HPCI and RCIC systems are environmentally qualified. The cooling systems are described in FSAR Section 9.4.2.2. The support equipment is safety-grade and single active failure proof. During normal operation the HPCI and RCIC equipment rooms are cooled by the Reactor Enclosure Ventilation System with the unit coolers operating automatically as needed, using non-safety related service water, for additional cooling. During accident conditions the unit coolers cool the spaces using emergency service water. The unit coolers are designed to maintain the spaces at $\leq 120^{\circ}\text{F}$. Loss of ESW supply to the unit coolers requires that the affected HPCI and RCIC systems be declared inoperable.

Plant Modifications: Modifications to the HPCI system will allow an increase of the EQ temperature qualification from 150°F to 172°F . The RCIC system will be upgraded as necessary for a 155°F temperature qualification. These actions will enable HPCI and RCIC systems to be operable without dependence on the unit coolers. To reflect the higher equipment qualification temperatures, the equipment room high temperature detection instrument setpoints must be raised to preclude the potential for unnecessary system isolations which would degrade the HPCI and RCIC systems reliability under accident conditions when the equipment room temperature rises. The modifications are scheduled to be completed prior to the Unit 2 third refueling outage (January 1995).

TS Changes: The HPCI equipment room high temperature trip setpoint would be increased from 175°F to 225°F , and the allowable value range increased from $165^{\circ}\text{F} \leq T \leq 175^{\circ}\text{F}$ to $218^{\circ}\text{F} \leq T \leq 247^{\circ}\text{F}$. The HPCI equipment room high ΔT trip setpoint would be increased from 88°F to 126°F , and the allowable value from $\leq 88^{\circ}\text{F}$ to $\leq 130.5^{\circ}\text{F}$. The RCIC equipment room high temperature trip setpoint would be increased from 175°F to 205°F , and the allowable value range

increased from $165^{\circ}\text{F} \leq T \leq 200^{\circ}\text{F}$ to $198^{\circ}\text{F} \leq T \leq 227^{\circ}\text{F}$. The RCIC equipment room high ΔT trip setpoint would be increased from 80°F to 109°F , and the allowable value from $\leq 88^{\circ}\text{F}$ to $\leq 113.5^{\circ}\text{F}$.

RCIC and HPCI Area Temperature Profile Analyses: The licensee analyzed the time vs. temperature response profile for the HPCI and RCIC Equipment Rooms assuming a DBA-LOCA with loss of cooling water supply to the unit coolers. The proposed new temperature setpoints (and environmental qualification requirements for HPCI) are based on those analyses. At a meeting with the staff on September 8, 1994, the licensee described the analytical methodology. The Bechtel thermal-hydraulic analysis code *PCFLUD* was used to model the compartment volumes, heat structures, mass and energy sources and sinks. The model predicted the resultant time-vs-temperature responses of the compartments. New EQ limits were established to bound the compartment temperatures, and new LDS setpoints selected to assure that loss of ESW under accident conditions would not alone (in the absence of a steam leak) result in inadvertent isolation of the HPCI or RCIC system.

In a letter dated September 23, 1994, the licensee forwarded additional information relating to the *PCFLUD* code. The letter states that *PCFLUD* has not been the subject of an independent staff review, but has been reviewed by the staff in the course of other licensing actions. The letter also states that *PCFLUD* is derived from predecessor codes *COPATTA* and *COPDA* which were reviewed and approved by the staff and has been validated and verified. Based on this information, the staff accepts the licensee's analytical methodology for analysis of the HPCI and RCIC Equipment Compartment temperature profile.

Radiological Concerns: The proposed amendment does not involve any increase in the radiological dose consequences of a Main Steam Line Failure Outside of Containment, an analyzed event for which Standard Review Plan Section 15.6.4 specifies acceptable analytical methodology and dose acceptance criteria. The licensee's application states that the limiting break size and location continue to be that of a (much larger) main steam line.

The licensee has performed appropriate analyses to determine the temperature conditions necessary for qualification of HPCI and RCIC systems to operate without the support of the normal and emergency cooling water sources to their equipment rooms. The licensee has also established revised temperature setpoints for the steam leakage detection instruments serving the HPCI and RCIC turbines. The revised setpoints will assure that the LDS will detect steam line leakage and isolate the turbine in the event a compartment is heated by a steam line break, but will permit continued HPCI or RCIC turbine operation in the event a compartment is heated due to loss of cooling water. Based on its review, the staff concludes that the licensee's application of July 20, 1994 relating to the Leak Detection System 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 47178). 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: W. Long

Date: January 20, 1995