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 Nuclear Group Headquarters  
 Correspondence Control Desk  
 P.O. Box No. 195  
 Wayne, PA 19087-0195

June 22, 1995

SUBJECT: RELOCATION OF PRIMARY CONTAINMENT CONDUCTOR PROTECTION DEVICE REQUIREMENTS, LIMERICK GENERATING STATION, UNITS 1 AND 2 (TAC NOS. M90375, M90376, M90512, AND M90513)

Dear Mr. Hunger:

The Commission has issued the enclosed Amendment No. 93 to Facility Operating License No. NPF-39 and Amendment No. 57 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.

These amendments relocate the requirements of TS 3/4.8.4.1, "Primary Containment Penetration Conductor Overcurrent Protective Devices," to the Updated Final Safety Analysis Report and plant procedures. These amendments address Section 2, "Relocation of Primary Containment Conductor Protection Device Requirements, (TSCR 94-36-0)" of your August 31, 1994 TS change request submittal.

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

Docket Nos. 50-352/50-353

- Enclosures: 1. Amendment No. 93 to License No. NPF-39  
 Amendment No. 57 to License No. NPF-85  
 2. Safety Evaluation

cc w/encls: See next page

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JStolz	TLiu	*See previous concurrence

MS for 2/7/95

OGC	:PDI-2/LA	:PDI-2/PM	:PDI-2/PM	:*EELB	:OGC	:PDI-2/D
NAME	:MO'Brien	:TLiu	:FRinaldi	:CBerlinger		:JStolz
DATE	:5/26/95	:6/9/95	:6/12/95	:3/15/95	:6/15/95	:6/21/95

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UNITED STATES  
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

June 22, 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, PA 19087-0195

SUBJECT: RELOCATION OF PRIMARY CONTAINMENT CONDUCTOR PROTECTION DEVICE  
REQUIREMENTS, LIMERICK GENERATING STATION, UNITS 1 AND 2 (TAC NOS.  
M90375, M90376, M90512, AND M90513)

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

Sincerely,

A handwritten signature in cursive script, appearing to read "Frank Rinaldi".

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

Docket Nos. 50-352/50-353

Enclosures: 1. Amendment No. 93 to  
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2. Safety Evaluation

cc w/encs: See next page

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

Limerick Generating Station,  
Units 1 & 2

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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. 93  
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.

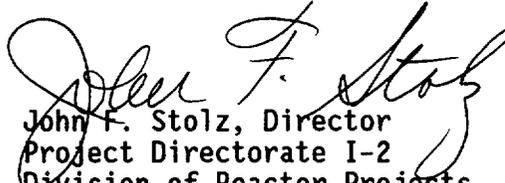
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.(2) of Facility Operating License No. NPF-39 is hereby amended to read as follows:

Technical Specifications

The Technical Specifications contained in Appendix A and the Environmental Protection Plan contained in Appendix B, as revised through Amendment No. 93, 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: June 22, 1995

ATTACHMENT TO LICENSE AMENDMENT NO. 93

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.

<u>Remove</u>	<u>Insert</u>
xv	xv
3/4 8-21	3/4 8-21
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**Section 3/4.8.4.1 (Deleted)**

**THE INFORMATION FROM THIS TECHNICAL SPECIFICATION SECTION  
HAS BEEN RELOCATED TO THE UFSAR. TECHNICAL SPECIFICATIONS  
PAGES 3/4 8-21 THROUGH 3/4 8-26 OF THE SECTION HAVE BEEN  
INTENTIONALLY OMITTED.**

## ELECTRICAL POWER SYSTEMS

### BASES

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#### 3/4.8.4 ELECTRICAL EQUIPMENT PROTECTIVE DEVICES

The bypassing of the motor operated valves thermal overload protection continuously by integral bypass devices ensures that the thermal overload protection will not prevent safety related valves from performing their function. The Surveillance Requirements for demonstrating the bypassing of the thermal overload protection continuously are met by functionally testing the automatic operation of the motor operated valve and ensuring that the motor thermal overload protection design does not change and is in accordance with Regulatory Guide 1.106 "Thermal Overload Protection for Electric Motors on Motor Operated Valves", Revision 1, March 1977.



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. 57  
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. 57, 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 12  
Division of Reactor Projects - I/II  
Office of Nuclear Reactor Regulation

Attachment: Changes to the  
Technical Specifications

Date of Issuance: June 22, 1995

ATTACHMENT TO LICENSE AMENDMENT NO. 57

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.

<u>Remove</u>	<u>Insert</u>
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3/4 8-21	3/4 8-21
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**Section 3/4 8.4.1 (Deleted)**

**THE INFORMATION FROM THIS TECHNICAL SPECIFICATION SECTION  
HAS BEEN RELOCATED TO THE UFSAR. TECHNICAL SPECIFICATIONS  
PAGES 3/4 8-21 THROUGH 3/4 8-26 OF THIS SECTION HAVE BEEN  
INTENTIONALLY OMITTED.**

## ELECTRICAL POWER SYSTEMS

### BASES

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#### 3/4.8.4 ELECTRICAL EQUIPMENT PROTECTIVE DEVICES

The bypassing of the motor operated valves thermal overload protection continuously by integral bypass devices ensures that the thermal overload protection will not prevent safety related valves from performing their function. The Surveillance Requirements for demonstrating the bypassing of the thermal overload protection continuously are met by functionally testing the automatic operation of the motor operated valve and ensuring that the motor thermal overload protection design does not change and is in accordance with Regulatory Guide 1.106 "Thermal Overload Protection for Electric Motors on Motor Operated Valves", Revision 1, March 1977.



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NOS. 93 AND 57 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 (LGS), Units 1 and 2, Technical Specifications (TSs). The requested changes would relocate the requirements of TS 3/4.8.4.1, "Primary Containment Penetration Conductor Overcurrent Protective Devices," to the Updated Final Safety Analysis Report and plant procedures. These amendments address Section 2 of the licensee's August 31, 1994 submittal, "Relocation of Primary Containment Conductor Protection Device Requirements." There are four remaining items to this application.

2.0 BACKGROUND

Section 182a of the Atomic Energy Act (the "Act") requires applicants for nuclear power plant operating licenses to include the TSs as part of the license. The Commission's regulatory requirements related to the content of the TSs are set forth in 10 CFR 50.36. That regulation requires that the TSs include items in five specific categories, including (1) safety limits, limiting safety system settings and limiting control settings; (2) limiting conditions for operation; (3) surveillance requirements; (4) design features; and (5) administrative controls. However, the regulation does not specify the particular requirements to be included in a plant's TSs.

The Commission has provided guidance for the contents of the TSs in its "Final Policy Statement on Technical Specifications Improvements for Nuclear Power Reactors" ("Final Policy Statement"), 58 FR 39132 (July 22, 1993), in which the Commission indicated that compliance with the Final Policy Statement satisfies Section 182a of the Act. In particular, the Commission indicated that certain items could be relocated from the TSs to licensee-controlled documents, consistent with the standard enunciated in *Portland General Electric Co.* (Trojan Nuclear Plant), ALAB-531, 9 NRC 263, 273 (1979). In that case, the Atomic Safety and Licensing Appeal Board indicated that "technical specifications are to be reserved for those matters as to which the imposition of rigid conditions or limitations upon reactor operation is deemed necessary to obviate the possibility of an abnormal situation or event giving rise to an immediate threat to the public health and safety."

Consistent with this approach, the Final Policy Statement identified four criteria to be used in determining whether a particular matter is required to be included in the TS, as follows:

- (1) Installed instrumentation that is used to detect, and indicate in the control room, a significant abnormal degradation of the reactor coolant pressure boundary;
- (2) a process variable, design feature, or operating restriction that is an initial condition of a Design Basis Accident or Transient analysis that either assumes the failure of or presents a challenge to the integrity of a fission product barrier;
- (3) a structure, system, or component that is part of the primary success path and which functions or actuates to mitigate a Design Basis Accident or Transient that either assumes the failure of or presents a challenge to the integrity of a fission product barrier;
- (4) a structure, system, or component which operating experience or probabilistic safety assessment has shown to be significant to public health and safety.<sup>1</sup>

As a result, existing TS requirements which fall within or satisfy any of the criteria in the Final Policy Statement must be retained in the TS, while those TS requirements which do not fall within or satisfy these criteria may be relocated to other, licensee-controlled documents.

### 3.0 EVALUATION

TS Section 3/4.8.4.1 addresses the Limiting Condition for Operation and Surveillance Requirements on "Primary Containment Penetration Conductor Overcurrent Protective Devices." The two TS sections provide requirements to protect penetrations and penetration conductors by either de-energizing circuits not required during reactor operation or by demonstrating the OPERABILITY of primary and backup overcurrent protection circuit breakers utilizing periodic surveillance.

The licensee stated that the overcurrent protective devices are not used for, nor capable of detecting a significant abnormal degradation of the reactor coolant pressure boundary. Further evaluations were addressed by the licensee in their safety assessment as follows:

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<sup>1</sup> The Commission recently promulgated a proposed change to 10 CFR 50.36, pursuant to which the rule would be amended to codify and incorporate these criteria (59 FR 48180). The Commission's Final Policy Statement specified that only limiting conditions for Reactor Core Isolation Cooling, Isolation Condenser, Residual Heat Removal, Standby Liquid Control, and Recirculation Pump Trip meet the guidance for inclusion in the TS under Criterion 4 (58 FR at 39137). The Commission has solicited public comments on the scope of Criterion 4, in the pending rulemaking.

"The devices are not process variables or do not monitor a process variable that is an initial condition of a [design-basis accident] DBA or transient analysis that either assumes the failure of or presents a challenge to the integrity of a fission product barrier. The devices are not part of the primary success path that functions or actuates to mitigate a DBA or transient that either assumes the failure of or presents a challenge to the integrity of a fission product barrier. The devices are non-significant risk contributors to core damage frequency and offsite release."

The proposed change to relocate TS Section 3/4.8.4.1, "Primary Containment Penetration Conductor Overcurrent Protective Devices," to the UFSAR and plant controlled procedures is consistent with the criteria delineated in NUREG-1433, "Standard Technical Specifications, General Electric Plants, BWR/4," dated september 28, 1992. All changes to UFSAR and plant controlled procedures are subject to the evaluation per 10 CFR 50.59 provisions.

In conclusion, these specific instrumentation requirements are not required to be in the TS under 10 CFR 50.36 or § 182a of the Atomic Energy Act, and are not required to obviate the possibility of an abnormal situation or event giving rise to an immediate threat to the public health and safety. Further, they do not fall within any of the four criteria set forth in the Commission's Final Policy Statement, discussed above. In addition, the Staff finds that sufficient regulatory controls exist under 10 CFR 50.59 [or such other specific regulatory control] as may be applicable in the particular instance to address future changes to these requirements. Accordingly, the staff has concluded that these requirements may be relocated from the TS to the licensee's UFSAR.

The staff agrees with the licensee's safety assessment for the proposed change which is consistent with NUREG-1433. Based on the review, the staff concludes that the proposed change to relocate TS Section 3/4.8.4.1, "Primary Containment Penetration Conductor Overcurrent Protective Devices," to the UFSAR and plant controlled procedures is acceptable.

#### 4.0 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.

#### 5.0 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.

#### 6.0 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: June 22, 1995