

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

January 19, 1994

SUBJECT: INSTALLATION OF THIRD TOXIC GAS MONITORING CHANNEL, LIMERICK
 GENERATING STATION, UNITS 1 AND 2 (TAC NOS. M87290 AND M87291)

Dear Mr. Hunger:

The Commission has issued the enclosed Amendment No. 84 to Facility Operating License No. NPF-39 and Amendment No. 45 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 August 25, 1993, as supplemented by letter dated August 4, 1994.

These amendments revise Technical Specification (TS) Section 3.3.7.8.2 and associated Bases 3/4.3.7.8 regarding the Main Control Room (MCR) toxic gas detection system. The TS change reflects the implementation of a modification designed to eliminate spurious high toxic gas concentration alarms received by the MCR.

A copy of our Safety Evaluation is also enclosed. Notice of Issuance will be included in the Commission's biweekly Federal Register notice. You are requested to notify the NRC, in writing, when the amendments have been implemented at Limerick, Units 1 and 2.

Sincerely,

/s/

9501260268 950119
 PDR ADOCK 05000352
 P PDR

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. 84 to License No. NPF-39
 Amendment No. 45 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 19, 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

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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. 84
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 25, 1993, as supplemented by letter dated August 4, 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. 84, 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


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 19, 1995

ATTACHMENT TO LICENSE AMENDMENT NO. 84

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 3-91

B 3/4 3-6

Insert

3/4 3-91

B 3/4 3-6

INSTRUMENTATION

TOXIC GAS DETECTION SYSTEM

LIMITING CONDITION FOR OPERATION

3.3.7.8.2 Three independent toxic gas detection system subsystems shall be OPERABLE with their alarm setpoints adjusted to actuate at a toxic gas concentration of less than or equal to:

<u>CHEMICAL</u>	<u>MONITOR SET POINT (ppm)</u>
Ammonia	25
Ethylene Oxide	50
Formaldehyde	5
Vinyl Chloride	10
Phosgene	0.4

APPLICABILITY: All OPERATIONAL CONDITIONS.

ACTION:

- a. With one toxic gas detection subsystem inoperable, place the inoperable subsystem in the tripped condition within 24 hours.
- b. With two toxic gas detection system subsystems inoperable, place one inoperable subsystem in the tripped condition within 1 hour, restore one inoperable detection subsystem to OPERABLE status within 7 days, or initiate and maintain operation of at least one control room emergency filtration subsystem in the chlorine isolation mode of operation.
- c. With three toxic gas detection subsystems inoperable, within 1 hour initiate and maintain operation of at least one control room emergency filtration subsystem in the chlorine isolation mode of operation.

SURVEILLANCE REQUIREMENTS

4.3.7.8.2 Each of the above required toxic gas detection system subsystems shall be demonstrated OPERABLE by performance of a:

- a. CHANNEL CHECK at least once per 12 hours,
- b. CHANNEL FUNCTIONAL TEST at least once per 31 days, and
- c. CHANNEL CALIBRATION at least once per 24 months.

INSTRUMENTATION

BASES

3/4.3.7.7 TRAVERSING IN-CORE PROBE SYSTEM

The OPERABILITY of the traversing in-core probe system with the specified minimum complement of equipment ensures that the measurements obtained from use of this equipment accurately represent the spacial neutron flux distribution of the reactor core.

The TIP system operability is demonstrated by normalizing all probes (i.e., detectors) prior to performing an LPRM calibration function. Monitoring core thermal limits may involve utilizing individual detectors to monitor selected areas of the reactor core, thus all detectors may not be required to be OPERABLE. The OPERABILITY of individual detectors to be used for monitoring is demonstrated by comparing the detector(s) output in the resultant heat balance calculation (P-1) with data obtained during a previous heat balance calculation (P-1).

3/4.3.7.8 CHLORINE AND TOXIC GAS DETECTION SYSTEMS

The OPERABILITY of the chlorine and toxic gas detection systems ensures that an accidental chlorine and/or toxic gas release will be detected promptly and the necessary protective actions will be automatically initiated for chlorine and manually initiated for toxic gas to provide protection for control room personnel. Upon detection of a high concentration of chlorine, the control room emergency ventilation system will automatically be placed in the chlorine isolation mode of operation to provide the required protection. Upon detection of a high concentration of toxic gas, the control room emergency ventilation system will manually be placed in the chlorine isolation mode of operation to provide the required protection. The detection systems required by this specification are consistent with the recommendations of Regulatory Guide 1.95, "Protection of Nuclear Power Plant Control Room Operators against an Accidental Chlorine Release," February 1975.

There are three toxic gas detection subsystems. The high toxic chemical concentration alarm in the Main Control Room annunciates when two of the three subsystems detect a high toxic gas concentration. An Operate/Inop keylock switch is provided for each subsystem which allows an individual subsystem to be placed in the tripped condition. Placing the keylock switch in the INOP position initiates one of the two inputs required to initiate the alarm in the Main Control Room.

Specified surveillance intervals and maintenance outage times have been determined in accordance with GENE-770-06-1, "Bases for Changes to Surveillance Test Intervals and Allowed Out-of-Service Times for Selected Instrumentation Technical Specifications," as approved by the NRC and documented in the SER (letter to R.D. Binz, IV, from C.E. Rossi dated July 21, 1992).

3/4.3.7.9 FIRE DETECTION INSTRUMENTATION

OPERABILITY of the detection instrumentation ensures that both adequate warning capability is available for prompt detection of fires and that fire suppression systems, that are actuated by fire detectors, will discharge extinguishing agent in a timely manner. Prompt detection and suppression of fires will reduce the potential for damage to safety-related equipment and is an integral element in the overall facility fire protection program.

Fire detectors that are used to actuate fire suppression systems represent a more critically important component of a plant's fire protection program than detectors that are installed solely for early fire warning and notification. Consequently, the minimum number of OPERABLE fire detectors must be greater.



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. 45
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 25, 1993, as supplemented by letter dated August 4, 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.

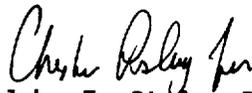
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.(2) of Facility Operating License No. NPF-85 is hereby amended to read as follows:

Technical Specifications

The Technical Specifications contained in Appendix A and the Environmental Protection Plan contained in Appendix B, as revised through Amendment No. 45, are hereby incorporated into this license. Philadelphia Electric Company shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. This license amendment is effective as of its date of issuance and shall be implemented within 30 days.

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 19, 1995

ATTACHMENT TO LICENSE AMENDMENT NO. 45

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>
3/4 3-91	3/4 3-91
B 3/4 3-6	B 3/4 3-6

INSTRUMENTATION

TOXIC GAS DETECTION SYSTEM

LIMITING CONDITION FOR OPERATION

3.3.7.8.2 Three independent toxic gas detection system subsystems shall be OPERABLE with their alarm setpoints adjusted to actuate at a toxic gas concentration of less than or equal to:

<u>CHEMICAL</u>	<u>MONITOR SET POINT (ppm)</u>
Ammonia	25
Ethylene Oxide	50
Formaldehyde	5
Vinyl Chloride	10
Phosgene	0.4

APPLICABILITY: ALL OPERATIONAL CONDITIONS.

ACTION:

- a. With one toxic gas detection subsystem inoperable, place the inoperable subsystem in the tripped condition within 24 hours.
- b. With two toxic gas detection system subsystems inoperable, place one inoperable subsystem in the tripped condition within 1 hour, restore one inoperable detection subsystem to OPERABLE status within 7 days, or initiate and maintain operation of at least one control room emergency filtration subsystem in the chlorine isolation mode of operation.
- c. With three toxic gas detection subsystems inoperable, within 1 hour initiate and maintain operation of at least one control room emergency filtration subsystem in the chlorine isolation mode of operation.

SURVEILLANCE REQUIREMENTS

4.3.7.8.2 Each of the above required toxic gas detection system subsystems shall be demonstrated OPERABLE by performance of a:

- a. CHANNEL CHECK at least once per 12 hours,
- b. CHANNEL FUNCTIONAL TEST at least once per 31 days, and
- c. CHANNEL CALIBRATION at least once per 24 months.

INSTRUMENTATION

BASES

3/4.3.7.7 TRAVERSING IN-CORE PROBE SYSTEM

The OPERABILITY of the traversing in-core probe system with the specified minimum complement of equipment ensures that the measurements obtained from use of this equipment accurately represent the spacial neutron flux distribution of the reactor core.

The TIP system operabilty is demonstrated by normalizing all probes (i.e., detectors) prior to performing an LPRM calibration function. Monitoring core thermal limits may involve utilizing individual detectors to monitor selected areas of the reactor core, thus all detectors may not be required to be OPERABLE. The OPERABILITY of individual detectors to be used for monitoring is demonstrated by comparing the detector(s) output in the resultant heat balance calculation (P-1) with data obtained during a previous heat balance calculation (P-1).

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OPERABILITY of the detection instrumentation ensures that both adequate warning capability is available for prompt detection of fires and that fire suppression systems, that are actuated by fire detectors, will discharge extinguishing agent in a timely manner. Prompt detection and suppression of fires will reduce the potential for damage to safety-related equipment and is an integral element in the overall facility fire protection program.

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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. 84 AND 45 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 25, 1993, as supplemented August 4, 1994, the Philadelphia Electric Company (the licensee) submitted a request for changes to the Technical Specifications (TS) (Appendix A) of Facility Operating License Nos. NPF-39 and NPF-85 for the Limerick Generating Station, Units 1 and 2. The proposed TS change would revise TS Section 3.3.7.8.2 and associated Bases 3/4.3.7.8 regarding the Main Control Room (MCR) Toxic Chemical (Gas) Detection system as a result of installing a third toxic gas monitoring channel and modifying the actuation logic for a high toxic gas actuation signal. The actuation logic would be revised to provide two-out-of-three logic for a high toxic gas actuation signal as opposed to the current one-out-of-two logic. The supplement provided clarifying information that did not change the initial proposed no significant hazards consideration determination.

2.0 EVALUATION

In reviewing the original design and logic for the toxic chemical detection system, the staff reported in Section 6.4 of its Safety Evaluation Report (NUREG-0991) that during a postulated hazardous chemical release, detection and alarm capabilities at Limerick will ensure that control room personnel can don breathing apparatus before the toxic gas concentration in the control room could exceed the applicable toxicity limits.

The toxic chemical detection system is a non-safety-related system designed to protect MCR personnel from the effects of an offsite release of toxic chemicals. The system is provided to detect toxic chemicals, provide annunciation in the control room, and identify the chemical and concentration to a control room console. The Toxic Chemical Isolation Mode is an accident mode of operation for the MCR. During a high toxic gas concentration alarm in the MCR, plant procedures require MCR personnel to don self-contained breathing apparatus (SCBA) and take manual action to isolate the normal MCR Heating, Ventilation, and Air Conditioning (HVAC) and initiate the Control Room Emergency Fresh Air Supply (CREFAS) system.

The licensee has proposed a plant modification to change the design of the high toxic gas concentration alarm logic. Currently, two chemical analyzers are installed with a one-out-of-two logic to cause an MCR high toxic gas concentration alarm. The modification will add a third chemical analyzer and require that two out of the three chemical analyzers must detect toxic gas concentrations at or above the detector setpoint to cause an MCR high toxic gas concentration alarm. The intent of the modification is to reduce the probability of false high toxic gas alarms. The "two-out-of-three" alarm logic will be maintained by the "Auto-Trip" selector switch that will be installed for each of the three chemical analyzers. The selector switch will be used to place an inoperable analyzer in a tripped condition. Placing the selector switch in the tripped condition provides one of the two inputs required to initiate the high toxic gas concentration alarm.

The existing TS 3.3.7.8.2 action statement for an inoperable toxic chemical detection system requires the system be restored to operable within 7 days, or within the next 6 hours initiate and maintain operation of at least one control room emergency filtration system subsystem in the chlorine isolation mode of operation. The action statement also states with both toxic gas detection systems inoperable, within 1 hour initiate and maintain operation of at least one control room emergency filtration system subsystem in the chlorine isolation mode of operation.

The proposed TS action statement for one toxic gas detection subsystem inoperable, is to place the inoperable subsystem in the tripped condition within 24 hours. If two toxic gas detection system subsystems are inoperable, place one inoperable subsystem in the tripped condition within 1 hour, restore one inoperable detection subsystem to operable status within 7 days, or initiate and maintain operation of at least one control room emergency filtration subsystem in the chlorine isolation mode of operations. If three toxic gas detection subsystems are inoperable, within 1 hour initiate and maintain operation of at least one control room emergency filtration subsystem in the chlorine isolation mode of operation.

The modification should improve the reliability of the system and decrease spurious actuations. The TS changes will provide operability of the system consistent with the original TS; however, it also allows for greater flexibility by allowing operation with an additional channel out-of-service because of the addition of the third channel. Therefore, the staff finds the toxic chemical detection system, the change to the TS 3.3.7.8.2 Limiting Condition for Operation, and Bases 3/4.3.7.8 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 (58 FR 50971). 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: J. Zimmerman

Date: January 19, 1995