

June 1, 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: DRAINING OF SPRAY POND SPRAY NETWORK PIPING, LIMERICK GENERATING STATION, UNITS 1 AND 2 (TAC NOS. M87293 AND M87294)

Dear Mr. Hunger:

The Commission has issued the enclosed Amendment No. 90 to Facility Operating License No. NPF-39 and Amendment No. 54 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 letters dated June 27, 1994, and May 5, 1995.

These amendments modify Technical Specification Surveillance Requirement 4.7.1.3 to require that all spray pond spray network piping above the frost line be drained at an ambient temperature below 40°F, and within 1 hour after being used only when the ambient temperature is below 40°F.

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. 50-352/353

- Enclosures: 1. Amendment No. 90 to License No. NPF-39
Amendment No. 54 to License No. NPF-85
- 2. Safety Evaluation

cc w/encls: See next page

DISTRIBUTION:

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

OFC	:PDI-2/LA	:PDI-2/PE	:PDI-2/PM	:SPLB	:OGC	:PDI-2/D	:
NAME	:MO'Brien	:JZimmerman	:rb:FRinaldi	:CMcCracken	:RBachmann	:JStolz	:
DATE	:5/10/95	:5/10/95	:5/10/95	:5/15/95	:5/19/95	:5/10/95	:

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JStolz	GHill(2)	

OFC	: PDI-2/LA	: PDI-2/PE	: PDI-2/PM	: SPLB	: OGC	: PDI-2/D	:
NAME	: MO'Brien	: JZimmerman	: rb:FRinaldi	: C McCracken	: R Bachmann	: JStolz	:
DATE	: 5/10/95	: 5/10/95	: 5/10/95	: 5/11/95	: 5/19/95	: 5/10/95	:



UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

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Sincerely,

A handwritten signature in cursive script that reads "Frank Rinaldi".

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

Docket Nos. 50-352/353

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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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Board of Supervisors
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Linfield, PA 19468



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. 90
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 letters dated June 27, 1994, and May 5, 1995, 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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PDR ADOCK 05000352
P PDR

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. 90, 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: June 1, 1995

ATTACHMENT TO LICENSE AMENDMENT NO. 90

FACILITY OPERATING LICENSE NO. NPF-39

DOCKET NO. 50-352

Replace the following page of the Appendix A Technical Specifications with the attached page. The revised page is identified by Amendment number and contains vertical lines indicating the area of change.

Remove

3/4 7-5

Insert

3/4 7-5

PLANT SYSTEMS

ULTIMATE HEAT SINK

LIMITING CONDITION FOR OPERATION

3.7.1.3 The spray pond shall be OPERABLE with:

- a. A minimum pond water level at or above elevation 250' 10" Mean Sea Level, and
- b. A pond water temperature of less than or equal to 88°F.

APPLICABILITY: OPERATIONAL CONDITIONS 1, 2, 3, 4, 5, and *.

ACTION:

With the requirements of the above specification not satisfied:

- a. In OPERATIONAL CONDITION 1, 2, or 3, be in at least HOT SHUTDOWN within 12 hours and in COLD SHUTDOWN within the next 24 hours.
- b. In OPERATIONAL CONDITION 4 or 5, declare the RHRSW system and the emergency service water system inoperable and take the ACTION required by Specifications 3.7.1.1 and 3.7.1.2.
- c. In OPERATIONAL CONDITION *, declare the emergency service water system inoperable and take the ACTION required by Specification 3.7.1.2. The provisions of Specification 3.0.3 are not applicable.

SURVEILLANCE REQUIREMENTS

4.7.1.3 The spray pond shall be determined OPERABLE:

- a. By verifying the pond water level to be greater than its limit at least once per 24 hours.
- b. By verifying the water surface temperature (within the upper two feet of the surface) to be less than or equal to 88°F:
 1. at least once per 4 hours when the spray pond temperature is greater than or equal to 80°F; and
 2. at least once per 2 hours when the spray pond temperature is greater than or equal to 85°F; and
 3. at least once per 24 hours when the spray pond temperature is greater than 32°F.
- c. By verifying all piping above the frost line is drained:
 1. within one (1) hour after being used when ambient air temperature is below 40°F; or
 2. when ambient air temperature falls below 40°F if the piping has not been previously drained.

*When handling irradiated fuel in the secondary containment.



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. 54
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 letters dated June 27, 1994, and May 5, 1995, 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. 54, 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: June 1, 1995

ATTACHMENT TO LICENSE AMENDMENT NO. 54

FACILITY OPERATING LICENSE NO. NPF-85

DOCKET NO. 50-353

Replace the following page of the Appendix A Technical Specifications with the attached page. The revised page is identified by Amendment number and contains vertical lines indicating the area of change.

Remove

3/4 7-5

Insert

3/4 7-5

PLANT SYSTEMS

ULTIMATE HEAT SINK

LIMITING CONDITION FOR OPERATION

3.7.1.3 The spray pond shall be OPERABLE with:

- a. A minimum pond water level at or above elevation 250'-10" Mean Sea Level, and
- b. A pond water temperature of less than or equal to 88°F.

APPLICABILITY: OPERATIONAL CONDITIONS 1, 2, 3, 4, 5, and *.

ACTION:

With the requirements of the above specification not satisfied:

- a. In OPERATIONAL CONDITION 1, 2, or 3, be in at least HOT SHUTDOWN within 12 hours and in COLD SHUTDOWN within the next 24 hours.
- b. In OPERATIONAL CONDITION 4 or 5, declare the RHRSW system and the emergency service water system inoperable and take the ACTION required by Specifications 3.7.1.1 and 3.7.1.2.
- c. In OPERATIONAL CONDITION *, declare the emergency service water system inoperable and take the ACTION required by Specification 3.7.1.2. The provisions of Specification 3.0.3 are not applicable.

SURVEILLANCE REQUIREMENTS

4.7.1.3 The spray pond shall be determined OPERABLE:

- a. By verifying the pond water level to be greater than its limit at least once per 24 hours.
- b. By verifying the water surface temperature (within the upper two feet of the surface) to be less than or equal to 88°F:
 1. at least once per 4 hours when the spray pond temperature is greater than or equal to 80°F; and
 2. at least once per 2 hours when the spray pond temperature is greater than or equal to 85°F; and
 3. at least once per 24 hours when the spray pond temperature is greater than 32°F.
- c. By verifying all piping above the frost line is drained:
 1. within one (1) hour after being used when ambient air temperature is below 40°F; or
 2. when ambient air temperature falls below 40°F if the piping has not been previously drained.

*When handling irradiated fuel in the secondary containment.



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NOS. 90 AND 54 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 by letters dated June 27, 1994, and May 5, 1995, the Philadelphia Electric Company (PECo or the licensee) submitted a request for changes to the Limerick Generating Station, Units 1 and 2, Technical Specifications (TSs). The requested change would modify TS Surveillance Requirement (SR) 4.7.1.3 to require that all spray pond spray network piping above the frost line be drained at an ambient temperature below 40°F, and within one hour after being used only when the ambient air temperature is below 40°F.

2.0 EVALUATION

The spray pond serves both units at Limerick Generating Station (LGS) and is designed to supply the safety-related cooling water for the Emergency Service Water (ESW) and Residual Heat Removal Service Water (RHRSW) systems during accident conditions. The spray pond contains four spray tree networks with all piping above the water level on concrete pillars. Only one spray tree network is required for the safe shutdown of one unit and any two networks provide sufficient cooling to safely shut down both units.

Currently, Technical Specification (TS) Surveillance Requirement (SR) 4.7.1.3c requires that all spray pond piping above the frost line be drained within 1 hour after use regardless of the ambient air temperature. The proposed TS change would modify this TS SR to require that this piping be drained at an ambient temperature below 40°F, and within 1 hour after use whenever the ambient air temperature is below 40°F for freeze protection. As an added measure, the licensee has committed to revise the plant procedures that govern the draining of the spray pond piping networks to require draining within 1 hour after use, regardless of air temperature, during the time period between November 1 and March 31. This time period was selected based on National Weather Bureau data. These procedures will assure that discrepancies between air and ground temperatures will not be a factor in assuring that ice does not form in the spray pond piping located above the frost line. The licensee also plans to record the ambient air temperature each time the spray networks are

secured to allow further evaluation of the temperatures during the time period of November 1 to March 31, regardless of the ambient air temperature. In the event that the spray pond piping is not drained per the licensee's implementing procedures, compliance with the TS requirements will be evaluated by PECO. The staff recognizes that the licensee's implementing procedures are subject to change via the 10 CFR 50.59 process.

The proposed change to the TS SR does not require any modifications to the plant or equipment, and does not impact any design or functional requirements of the spray pond, ESW, or RHRSW systems. The ESW and RHRSW systems will continue to function as designed to mitigate the consequences of an accident by supplying cooling water to selected plant equipment. The spray pond spray networks for the ESW and RHRSW systems will continue to operate as designed. Plant procedures will still continue to require that the spray networks be drained within 24 hours after use in order to minimize corrosion.

The proposed change is consistent with the NRC staff position provided in NUREG-0991, "Safety Evaluation Report Related to the Operation of Limerick Generating Station, Units 1 and 2," dated August 1983. In the evaluation, the NRC staff required that a limiting condition for operation be incorporated into the TSs that the spray pond piping be drained at an ambient air temperature of 40°F, and, within 1 hour after the operation of the spray networks with the air temperature below 40°F, all piping above the frost line is to be drained. Therefore, the staff concludes that the proposed change 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 and changes the surveillance requirements. 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 50972). 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 Contributors: J. Zimmerman
F. Rinaldi

Date: June 1, 1995