

Mr. George A. Hunger, Jr.  
 Director-Licensing, M-2A-1  
 PECO Energy Company  
 Nuclear Group Headquarters  
 Correspondence Control Desk  
 P. O. Box No. 195  
 Wayne, Pennsylvania 19087-0195

December 15, 1994

SUBJECT: ENVIRONMENTAL ASSESSMENT OF REQUEST FOR EXEMPTION FROM CERTAIN REQUIREMENTS OF 10 CFR PART 50, APPENDIX J, "PRIMARY REACTOR CONTAINMENT LEAKAGE TESTING FOR WATER-COOLED POWER REACTORS", LIMERICK GENERATING STATION, UNITS 1 AND 2 (TAC NOS. M89984 AND M89985)

Dear Mr. Hunger:

Enclosed is a copy of the Environmental Assessment and Finding of No Significant Impact related to your application dated July 22, 1994. The proposed exemption would allow a one-time exemption from the 2-year test interval for Type B and C leak rate tests required by 10 CFR Part 50, Appendix J, "Primary Reactor Containment Leakage Testing for Water-Cooled Power Reactors," Sections III.D.2(a) and III.D.3.

The exemption is necessary to allow the continuation of Unit 2 operation within its 24-month operating cycle, until its scheduled third refueling outage which is to begin on January 28, 1995.

The assessment is being forwarded to the Office of the Federal Register for publication.

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 and 50-353

Enclosure:  
 Environmental Assessment

cc w/encl:  
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UNITED STATES  
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

December 15, 1994

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

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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 and 50-353

Enclosure:  
Environmental Assessment

cc w/encl:  
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  
PHILADELPHIA ELECTRIC COMPANY  
DOCKET NOS. 50-352 AND 50-353  
LIMERICK GENERATING STATION, UNITS 1 AND 2  
ENVIRONMENTAL ASSESSMENT AND FINDING OF  
NO SIGNIFICANT IMPACT

The U.S. Nuclear Regulatory Commission (the Commission) is considering issuance of an exemption to Facility Operating License Nos. NPF-39 and NPF-85, issued to Philadelphia Electric Company (the licensee), for operation of the Limerick Generating Station (LGS), Units 1 and 2, located in Montgomery County, Pennsylvania.

ENVIRONMENTAL ASSESSMENT

Identification of the Proposed Action:

The proposed action would grant an exemption from 10 CFR Part 50, Appendix J, "Primary Reactor Containment Leakage Testing for Water-Cooled Power Reactors," Sections III.D.2(a) and III.D.3, which require that Type B and C containment penetration leak rate tests be performed during reactor shutdown for refueling, or other convenient intervals, but in no case greater than 2 years. The licensee requests that, this one-time exemption would allow the two-year interval to be exceeded by no more than 26 days and not to surpass February 19, 1995.

The proposed action is in accordance with the licensee's application for exemption dated July 22, 1994.

The Need for the Proposed Action:

The affected containment penetrations must be leak rate tested (either Type B or C test) during shutdown reactor conditions because testing of the penetrations requires access to the drywell or requires isolation of safety systems. The required leak rate test intervals for the affected penetrations listed on the licensee's exemption request will exceed the 2-year maximum test interval, if not tested between January 24, 1995 and February 18, 1995.

The licensee's upcoming refueling outage is scheduled to begin on January 28, 1995. The licensee has proposed the exemption to extend the leak test interval for the affected penetrations by no more than 26 days. This will allow the licensee to avoid shutting down 4 days earlier for the sole purpose of conducting Appendix J Type B and C tests. The proposed action will permit the licensee to have flexibility to schedule the leak rate tests within the upcoming outage time period.

Environmental Impacts of the Proposed Action:

The licensee has presented information in support of their request for a 26-day extension of the Type B and C test intervals. The Unit 2, as-left minimum pathway leak rate (i.e., maximum allowable leakage rate for maintaining primary containment), following the second Unit 2 refueling outage, was .13 L<sub>a</sub> (maximum allowable pathway leakage) or 20,625 standard cubic centimeters per minute (sccm), including contributions from the Main Steam Isolation Valves (MSIV); with a maximum pathway leak rate of .27 L<sub>a</sub> or 42,502 sccm, excluding MSIV leakage, in accordance with LGS's current Appendix J exemption. These as-left leak rates represent a significant margin to the maximum allowable pathway leakage of 158,273 sccm.

The Commission has completed the evaluation to the proposed action and concludes that this action would not significantly increase the probability of exceeding the maximum allowable value of expected primary containment leakage during a hypothetical design basis accident. Performing the Type B and C tests for the specified penetrations no more than 26 days beyond the 2-year interval, not to exceed February 19, 1995, would meet the underlying purpose of the rule, that any primary containment leakage during a hypothetical design basis accident will remain less than the maximum allowable leakage rate value established by 10 CFR Part 50, Appendix J.

Thus, radiological releases will not differ from those determined previously and the proposed action does not otherwise affect facility radiological effluent or occupational exposures. The change will not increase the probability or consequences of accidents, since no changes are being made in the types of any effluents that may be released offsite, and there is no significant increase in the allowable individual or cumulative occupational radiation exposure. Accordingly, the Commission concludes that there are no significant radiological environmental impacts associated with the proposed action.

With regard to potential nonradiological impacts, the proposed action involves a one-time schedular change to surveillance and testing requirements that does not affect nonradiological plant effluents and has no other environmental impact. Accordingly, the Commission concludes that there are no significant nonradiological environmental impacts associated with the proposed action.

Alternatives to the Proposed Action:

Since the Commission has concluded there is no measurable environmental impact associated with the proposed action, any alternatives with equal or greater environmental impact need not be evaluated. The principal alternative to the action would be to deny the request. Such action would not enhance the protection of the environment and would result in no change in current environmental impacts. The environmental impact of the proposed action and the alternative action are similar.

Alternative Use of Resources:

This action does not involve the use of any resources not previously considered in the "Final Environmental Statement related to the operation of Limerick Generating Station, Units 1 and 2," dated April 1984.

Agencies and Persons Consulted:

The NRC staff consulted with the Pennsylvania State official regarding the environmental impact of the proposed action. The State official had no comments.

FINDING OF NO SIGNIFICANT IMPACT

Based upon the environmental assessment, the Commission concludes that the proposed action will not have a significant effect on the quality of the human environment. Accordingly, the Commission has determined not to prepare an environmental impact statement for the proposed action.

For further details with respect to the proposed action, see the licensee's letter dated July 22, 1994, which is available for public inspection at the Commission's Public Document Room, The Gelman Building, 2120 L Street, NW., Washington, DC, and at the local public document room

located at the Pottstown Public Library, 500 High Street, Pottstown,  
Pennsylvania 19464.

Dated at Rockville, Maryland, this 15th day of December 1994.

For The Nuclear Regulatory Commission

*Chester Poslusny*

Chester Poslusny, Acting Director  
Project Directorate I-2  
Division of Reactor Projects -- I/II  
Office of Nuclear Reactor Regulation