

Mr. George A. Hunger,
Director-Licensing, M2A-1
PECO Energy Company
Nuclear Group Headquarters
Correspondence Control Desk
P.O. Box No. 195
Wayne, PA 19087-0195

November 10, 1995

SUBJECT: REMOVAL OF FIRE PROTECTION REQUIREMENTS FROM LICENSE AND TECHNICAL SPECIFICATIONS, LIMERICK GENERATING STATION, UNITS 1 AND 2 (TAC NOS. M91631 AND M91632)

Dear Mr. Hunger:

The Commission has issued the enclosed Amendment No. 104 to Facility Operating License No. NPF-39 and Amendment No. 68 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 December 2, 1994, as supplemented May 12, 1995.

These amendments change the Fire Protection License Condition and relocate the Fire Protection TS requirements to the Updated Final Safety Analysis Report in accordance with Generic Letter (GL) 86-10, "Implementation of Fire Protection Requirements," and GL 88-12, "Removal of Fire Protection Requirements from Technical Specifications."

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. 104 to
License No. NPF-39
Amendment No. 68 to
License No. NPF-85
2. Safety Evaluation

cc w/encls: See next page

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JStolz	GHill(2)	CMcCracken

*See previous concurrence

MS for S/295
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DATE : 11/16/95 : 11/16/95 : 10/20/95 : 10/23/95 : 10/27/95 : 11/16/95

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UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

November 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, PA 19087-0195

SUBJECT: REMOVAL OF FIRE PROTECTION REQUIREMENTS FROM LICENSE AND TECHNICAL SPECIFICATIONS, LIMERICK GENERATING STATION, UNITS 1 AND 2 (TAC NOS. M91631 AND M91632)

Dear Mr. Hunger:

The Commission has issued the enclosed Amendment No. 104 to Facility Operating License No. NPF-39 and Amendment No. 68 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 December 2, 1994, as supplemented May 12, 1995.

These amendments change the Fire Protection License Condition and relocate the Fire Protection TS requirements to the Updated Final Safety Analysis Report in accordance with Generic Letter (GL) 86-10, "Implementation of Fire Protection Requirements," and GL 88-12, "Removal of Fire Protection Requirements from Technical Specifications."

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 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. 50-352/50-353

Enclosures: 1. Amendment No. 104 to
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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

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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. 104
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 December 2, 1994, as supplemented May 12, 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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P PDR

2. Accordingly, Facility Operating License No. NPF-39, paragraph 2.C.(3) is hereby amended to read as follows:

Fire Protection (Section 9.5, SSER-2,-4)*

- a. Philadelphia Electric Company shall implement and maintain in effect all provisions of the approved Fire Protection Program as described in the Updated Final Safety Analysis Report for the facility, and as approved in the NRC Safety Evaluation Report dated August 1983 thru Supplement 9, dated August 1989, and Safety Evaluation dated November 20, 1995, subject to the following provision:

The licensee may make changes to the approved fire protection program without prior approval of the Commission only if those changes would not adversely affect the ability to achieve and maintain safe shutdown in the event of a fire.

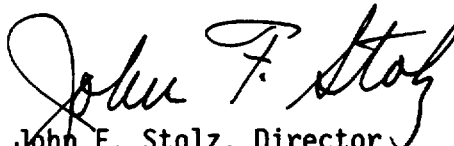
3. Further, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.(2) of Facility Operating License No. NPF-39 is hereby amended to read as follows:

Technical Specifications

The Technical Specifications contained in Appendix A and the Environmental Protection Plan contained in Appendix B, as revised through Amendment No. 104, are hereby incorporated into this license. Philadelphia Electric Company shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

4. 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

Attachments: 1. Page 4 of License*
2. Changes to the
Technical Specifications

Date of Issuance: November 20, 1995

*Page 4 is attached, for convenience, for the composite license to reflect this change.

ATTACHMENT TO LICENSE AMENDMENT NO. 104

FACILITY OPERATING LICENSE NO. NPF-39

DOCKET NO. 50-352

Replace the following pages of the Facility Operating License (FOL), and 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>
FOL	4	4
Appendix A	ix	ix
	xiv	xiv
	xix	xix
	xxi	xxi
	3/4 3-92	3/4 3-92
	3/4 3-93	-
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	3/4 3-96	-
	3/4 7-19	3/4 7-19
	3/4 7-20	-
	3/4 7-21	-
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	3/4 7-23	-
	3/4 7-24	-
	3/4 7-25	-
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	3/4 7-27	-
	3/4 7-28	-
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B	3/4 3-7	B 3/4 3-7
B	3/4 7-4	B 3/4 7-4
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	6-8	6-8

(3) Fire Protection (Section 9.5, SSER-2.-4)*

Philadelphia Electric Company shall implement and maintain in effect all provisions of the approved Fire Protection Program as described in the Updated Final Safety Analysis Report for the facility, and as approved in the NRC Safety Evaluation Report dated August 1983 through Supplement 9, dated August 1989, and Safety Evaluation dated November 20 , 1995, subject to the following provision:

The licensee may make changes to the approved fire protection program without prior approval of the Commission only if those changes would not adversely affect the ability to achieve and maintain safe shutdown in the event of a fire.

*The parenthetical notation following the title of many license conditions denotes the section of the Safety Evaluation Report and/or its supplements wherein the license condition is discussed.

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INSTRUMENTATION

Section 3/4.7.9 (Deleted)

THE INFORMATION FROM THIS TECHNICAL SPECIFICATIONS SECTION
HAS BEEN RELOCATED TO THE TECHNICAL REQUIREMENTS MANUAL (TRM) FIRE
PROTECTION SECTION. TECHNICAL SPECIFICATIONS PAGES 3/4 3-92 THROUGH
3/4 3-96 OF THIS SECTION HAVE BEEN INTENTIONALLY OMITTED.

PLANT SYSTEMS

Section 3/4.7.6 through 3/4.7.7 (Deleted)

THE INFORMATION FROM THESE TECHNICAL SPECIFICATIONS SECTIONS
HAVE BEEN RELOCATED TO THE TECHNICAL REQUIREMENTS MANUAL (TRM) FIRE
PROTECTION SECTION. TECHNICAL SPECIFICATIONS PAGES 3/4 7-19 THROUGH
3/4 7-32 HAVE BEEN INTENTIONALLY OMITTED.

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 (Deleted) - INFORMATION FROM THIS SECTION RELOCATED TO THE TRM.

INSTRUMENTATION

BASES

3/4.3.7.10 LOOSE PART DETECTION SYSTEM

The OPERABILITY of the loose-part detection system ensures that sufficient capability is available to detect loose metallic parts in the primary system and avoid or mitigate damage to primary system components. The allowable out-of-service times and surveillance requirements are consistent with the recommendations of Regulatory Guide 1.133, "Loose-Part Detection Program for the Primary System of Light-Water-Cooled Reactors," May 1981.

3/4.3.7.11 (Deleted) - INFORMATION FROM THIS SECTION RELOCATED TO THE ODCM.

3/4.3.7.12 OFFGAS MONITORING INSTRUMENTATION

This instrumentation includes provisions for monitoring the concentrations of potentially explosive gas mixtures and noble gases in the off-gas system.

3/4.3.8 (Deleted) - INFORMATION FROM THIS SECTION RELOCATED TO THE UFSAR.

3/4.3.9 FEEDWATER/MAIN TURBINE TRIP SYSTEM ACTUATION INSTRUMENTATION

The feedwater/main turbine trip system actuation instrumentation is provided to initiate action of the feedwater system/main turbine trip system in the event of failure of feedwater controller under maximum demand.

PLANT SYSTEMS

BASES

3/4 7.6 (Deleted) - INFORMATION FROM THIS SECTION RELOCATED TO THE TRM.

3/4.7.7 (Deleted) - INFORMATION FROM THIS SECTION RELOCATED TO THE TRM.

ADMINISTRATIVE CONTROLS

6.2.2 UNIT STAFF

- a. Each on duty shift shall be composed of at least the minimum shift crew composition shown in Table 6.2.2-1;
- b. At least one licensed Operator shall be in the control room when fuel is in the reactor. In addition, while the unit is in OPERATIONAL CONDITION 1, 2, or 3, at least one licensed Senior Operator shall be in the control room;
- c. A Health Physics Technician* shall be on site when fuel is in the reactor;
- d. ALL CORE ALTERATIONS shall be observed and directly supervised by either a licensed Senior Operator or licensed Senior Operator Limited to Fuel Handling who has no other concurrent responsibilities during this operation;
- e. (Deleted) - INFORMATION FROM THIS SECTION RELOCATED TO THE TRM.
- f. Administrative procedures shall be developed and implemented to limit the working hours of unit staff who perform safety-related functions (e.g., licensed Senior Operators, licensed Operators, health physicists, auxiliary operators, and key maintenance personnel).

Adequate shift coverage shall be maintained without routine heavy use of overtime. The objective shall be to have operating personnel work a normal 8-hour day, 40-hour week while the unit is operating. However, in the event that unforeseen problems require substantial amounts of overtime to be used, or during extended periods of shutdown for refueling, major maintenance, or major unit modifications, on a temporary basis the following guidelines shall be followed:

1. An individual should not be permitted to work more than 16 hours straight, excluding shift turnover time.
2. An individual should not be permitted to work more than 16 hours in any 24-hour period, nor more than 24 hours in any 48-hour period, nor more than 72 hours in any 7-day period, all excluding shift turnover time.
3. A break of at least 8 hours should be allowed between work periods, including shift turnover time.
4. Except during extended shutdown periods, the use of overtime should be considered on an individual basis and not for the entire staff on a shift.

* The Health Physics Technician position may be less than the minimum requirements for a period of time not to exceed 2 hours, in order to accommodate unexpected absence, provided immediate action is taken to fill the required position.

RESPONSIBILITIES

6.5.1.6 The PROC shall be responsible for:

- a. Review of (1) Administrative Procedures and changes thereto, (2) new programs or procedures required by specification 6.8 and requiring a 10 CFR 50.59 safety evaluation, and (3) proposed changes to programs or procedures required by Specification 6.8 and requiring a 10 CFR 50.59 safety evaluation;
- b. Review of all proposed tests and experiments that affect nuclear safety;
- c. Review of all proposed changes to Appendix A Technical Specifications;
- d. Review of all proposed changes or modifications to unit systems or equipment that affect nuclear safety;
- e. DELETED.
- f. Investigation of all violations of the Technical Specifications, including the preparation and forwarding of reports covering evaluation and recommendations to prevent recurrence, to the Vice President, Limerick Generating Station, Plant Manager, and to the Nuclear Review Board;
- g. Review of all REPORTABLE EVENTS;
- h. Review of unit operations to detect potential hazards to nuclear safety;
- i. Performance of special reviews, investigations, or analyses and reports thereon as requested by the Vice President, Limerick Generating Station, plant Manager or the Chairman of the Nuclear Review Board;
- j. Review of the Security Plan and implementing procedures and submittal of recommended changes to the Nuclear Review Board; and
- k. Review of the Emergency Plan and implementing procedures and submittal of the recommended changes to the Nuclear Review Board.
- l. Review of every unplanned onsite release of radioactive material to the environs including the preparation and forwarding of reports covering evaluation, recommendations and disposition of the corrective action to prevent recurrence to the Vice President, Limerick Generating Station, Plant Manager, and to the Nuclear Review Board.
- m. Review of changes to the PROCESS CONTROL PROGRAM, OFFSITE DOSE CALCULATION MANUAL, and radwaste treatment systems.
- n. Review of the Fire Protection Program and implementing procedures and the submittal of recommended changes to the Nuclear Review Board.

6.5.1.7 The PORC shall:

- a. Recommend in writing to the Plant Manager approval or disapproval of items considered under Specification 6.5.1.6a. through d. prior to their implementation.
- b. Render determinations in writing with regard to whether or not each item considered under Specification 6.5.1.6b. through f. constitutes an unreviewed safety question.



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. 68
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 December 2, 1994, as supplemented May 12, 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, Facility Operating License No. NPF-85, paragraph 2.C.(3) is hereby amended to read as follows:

Fire Protection (Section 9.5, SSER-2,-4)*

Philadelphia Electric Company shall implement and maintain in effect all provisions of the approved Fire Protection Program as described in the Updated Final Safety Analysis Report for the facility, and as approved in the NRC Safety Evaluation Report dated August 1983 thru Supplement 9, dated August 1989, and Safety Evaluation dated November 20 , 1995, subject to the following provision:

The licensee may make changes to the approved fire protection program without prior approval of the Commission only if those changes would not adversely affect the ability to achieve and maintain safe shutdown in the event of a fire.

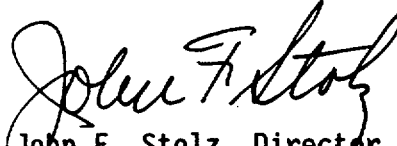
3. Further, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.(2) of Facility Operating License No. NPF-85 is hereby amended to read as follows:

Technical Specifications

The Technical Specifications contained in Appendix A and the Environmental Protection Plan contained in Appendix B, as revised through Amendment No. 68, are hereby incorporated into this license. Philadelphia Electric Company shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

4. 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

Attachments: 1. Pages 3 and 4 of License*
2. Changes to the Technical Specifications

Date of Issuance: November 20, 1995

*Pages 3 and 4 are attached, for convenience, for the composite license to reflect this change.

ATTACHMENT TO LICENSE AMENDMENT NO. 68

FACILITY OPERATING LICENSE NO. NPF-85

DOCKET NO. 50-353

Replace the following pages of the Facility Operating License (FOL), and 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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	4	4
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	xix	xix
	xxi	xxi
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	3/4 3-95	-
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	3/4 7-19	3/4 7-19
	3/4 7-20	-
	3/4 7-21	-
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	3/4 7-30	-
	3/4 7-31	-
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	B 3/4 3-7	B 3/4 3-7
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	6-8	6-8

- (4) Pursuant to the Act and 10 CFR Parts 30, 40, 70, to receive, possess, and use in amounts as required any byproduct, source or special nuclear material without restriction to chemical or physical form, for sample analysis or instrument calibration or associated with radioactive apparatus or components; and
 - (5) Pursuant to the Act and 10 CFR Parts 30, 40 and 70, to possess, but not separate, such byproduct and special nuclear materials as may be produced by the operation of the facility, and to receive and possess, but not separate, such source, byproduct, and special nuclear materials as contained in the fuel assemblies and fuel channels from the Shoreham Nuclear Power Station.
- (C) This license shall be deemed to contain and is subject to the conditions specified in the Commission's regulations set forth in 10 CFR Chapter I (except as exempted from compliance in Section 2.D. below) and is subject to all applicable provisions of the Act and to the rules, regulations, and orders of the Commission now or hereafter in effect; and is subject to the additional conditions specified or incorporated below:

(1) Maximum Power Level

Philadelphia Electric Company is authorized to operate the facility at reactor core power levels of 3458 megawatts thermal (100 percent rated power) in accordance with the conditions specified herein.

(2) Technical Specifications

The Technical Specifications contained in Appendix A and the Environmental Protection Plan contained in Appendix B, as revised through Amendment No. , 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) Fire Protection (Section 9.5, SSER-2,-4)*

Philadelphia Electric Company shall implement and maintain in effect all provisions of the approved Fire Protection Program as described in the Updated Final Safety Analysis Report for the facility, and as approved in the NRC Safety Evaluation Report dated August 1983 through Supplement 9, dated August 1989, and Safety Evaluation dated November 20, 1995, subject to the following provision:

The licensee may make changes to the approved fire protection program without prior approval of the Commission only if those changes would not adversely affect the ability to achieve and maintain safe shutdown in the event of a fire.

*The parenthetical notation following the title of license conditions denotes the section of the Safety Evaluation Report and/or its supplements wherein the license condition is discussed.

(4) Physical Security and Safeguards

The licensee shall fully implement and maintain in effect all provisions of the physical security, guard training and qualification and safeguards contingency plans previously approved by the Commission and all amendments and revisions to such plans made pursuant to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The plans, which contain Safeguards Information protected under 10 CFR 73.21, are entitled: "Limerick Generating Station, Units 1 & 2, Physical Security Plan," with revisions submitted through October 31, 1988; "Limerick Generating Station, Units 1 & 2, Plant Security Personnel Training and Qualification Plan," with revisions submitted through October 1, 1985; and "Limerick Generating Station, Units 1 & 2, Safeguards Contingency Plan," with revisions submitted through November 15, 1986.

- D. The facility requires exemptions from certain requirements of 10 CFR Part 50 and 10 CFR Part 70. These include (a) exemption from the requirement of paragraph III.D.2.(b)(ii) of Appendix J, the testing of containment air locks at times when the containment integrity is not required (Section 6.2.6.1 of the SER and SSER-3) (b) exemption from the requirements of paragraphs II.H.4 and III.C.2 of Appendix J, the leak rate testing of the Main Steam Isolation Valves (MSIVs) at the peak calculated containment pressure, Pa, and exemption from the requirements of paragraph III.C.3 of Appendix J that the measured MSIV leak rates be included in the summation for the local leak rate test (Section 6.2.6.1 of SSER-3), (c) exemption from the requirement of paragraphs II.H.1 and III.C.2 of Appendix J,

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INSTRUMENTATION

Section 3/4.7.9 (Deleted)

THE INFORMATION FROM THIS TECHNICAL SPECIFICATIONS SECTION
HAS BEEN RELOCATED TO THE TECHNICAL REQUIREMENTS MANUAL (TRM) FIRE
PROTECTION SECTION. TECHNICAL SPECIFICATIONS PAGES 3/4 3-92 THROUGH
3/4 3-96 OF THIS SECTION HAVE BEEN INTENTIONALLY OMITTED.

PLANT SYSTEMS

Section 3/4.7.6 through 3/4.7.7 (Deleted)

THE INFORMATION FROM THESE TECHNICAL SPECIFICATIONS SECTIONS
HAVE BEEN RELOCATED TO THE TECHNICAL REQUIREMENTS MANUAL (TRM) FIRE
PROTECTION SECTION. TECHNICAL SPECIFICATIONS PAGES 3/4 7-19 THROUGH
3/4 7-32 HAVE BEEN INTENTIONALLY OMITTED.

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 (Deleted) - INFORMATION FROM THIS SECTION RELOCATED TO THE TRM.

INSTRUMENTATION

BASES

3/4.3.7.10 LOOSE PART DETECTION SYSTEM

The OPERABILITY of the loose-part detection system ensures that sufficient capability is available to detect loose metallic parts in the primary system and avoid or mitigate damage to primary system components. The allowable out-of-service times and surveillance requirements are consistent with the recommendations of Regulatory Guide 1.133, "Loose-Part Detection Program for the Primary System of Light-Water-Cooled Reactors," May 1981.

3/4.3.7.11 (Deleted) - INFORMATION FROM THIS SECTION RELOCATED TO THE ODCM.

3/4.3.7.12 OFFGAS MONITORING INSTRUMENTATION

This instrumentation includes provisions for monitoring the concentrations of potentially explosive gas mixtures and noble gases in the off-gas system.

3/4.3.8 (Deleted) - INFORMATION FROM THIS SECTION RELOCATED TO THE UFSAR.

3/4.3.9 FEEDWATER/MAIN TURBINE TRIP SYSTEM ACTUATION INSTRUMENTATION

The feedwater/main turbine trip system actuation instrumentation is provided to initiate action of the feedwater system/main turbine trip system in the event of failure of feedwater controller under maximum demand.

PLANT SYSTEMS

BASES

3/4 7.6 (Deleted) - INFORMATION FROM THIS SECTION RELOCATED TO THE TRM.

3/4.7.7 (Deleted) - INFORMATION FROM THIS SECTION RELOCATED TO THE TRM.

ADMINISTRATIVE CONTROLS

6.2.2 UNIT STAFF

- a. Each on duty shift shall be composed of at least the minimum shift crew composition shown in Table 6.2.2-1;
- b. At least one licensed Operator shall be in the control room when fuel is in the reactor. In addition, while the unit is in OPERATIONAL CONDITION 1, 2, or 3, at least one licensed Senior Operator shall be in the control room;
- c. A Health Physics Technician* shall be on site when fuel is in the reactor;
- d. ALL CORE ALTERATIONS shall be observed and directly supervised by either a licensed Senior Operator or licensed Senior Operator Limited to Fuel Handling who has no other concurrent responsibilities during this operation;
- e. (Deleted) - INFORMATION FROM THIS SECTION RELOCATED TO THE TRM.
- f. Administrative procedures shall be developed and implemented to limit the working hours of unit staff who perform safety-related functions (e.g., licensed Senior Operators, licensed Operators, health physicists, auxiliary operators, and key maintenance personnel).

Adequate shift coverage shall be maintained without routine heavy use of overtime. The objective shall be to have operating personnel work a normal 8-hour day, 40-hour week while the unit is operating. However, in the event that unforeseen problems require substantial amounts of overtime to be used, or during extended periods of shut-down for refueling, major maintenance, or major unit modifications, on a temporary basis the following guidelines shall be followed:

1. An individual should not be permitted to work more than 16 hours straight, excluding shift turnover time.
2. An individual should not be permitted to work more than 16 hours in any 24-hour period, nor more than 24 hours in any 48-hour period, nor more than 72 hours in any 7-day period, all excluding shift turnover time.

* The Health Physics Technician position may be less than the minimum requirements for a period of time not to exceed 2 hours, in order to accommodate unexpected absence, provided immediate action is taken to fill the required position.

RESPONSIBILITIES

6.5.1.6 The PROC shall be responsible for:

- a. Review of (1) Administrative Procedures and changes thereto, (2) new programs or procedures required by Specification 6.8 and requiring a 10 CFR 50.59 safety evaluation, and (3) proposed changes to programs or procedures required by Specification 6.8 and requiring a 10 CFR 50.59 safety evaluation;
- b. Review of all proposed tests and experiments that affect nuclear safety;
- c. Review of all proposed changes to Appendix A Technical Specifications;
- d. Review of all proposed changes or modifications to unit systems or equipment that affect nuclear safety;
- e. DELETED.
- f. Investigation of all violations of the Technical Specifications, including the preparation and forwarding of reports covering evaluation and recommendations to prevent recurrence, to the Vice President, Limerick Generating Station, Plant Manager, and to the Nuclear Review Board;
- g. Review of all REPORTABLE EVENTS;
- h. Review of unit operations to detect potential hazards to nuclear safety;
- i. Performance of special reviews, investigations, or analyses and reports thereon as requested by the Vice President, Limerick Generating Station, plant Manager or the Chairman of the Nuclear Review Board;
- j. Review of the Security Plan and implementing procedures and submittal of recommended changes to the Nuclear Review Board; and
- k. Review of the Emergency Plan and implementing procedures and submittal of the recommended changes to the Nuclear Review Board.
- l. Review of every unplanned onsite release of radioactive material to the environs including the preparation and forwarding of reports covering evaluation, recommendations and disposition of the corrective action to prevent recurrence to the Vice President, Limerick Generating Station, Plant Manager, and to the Nuclear Review Board.
- m. Review of changes to the PROCESS CONTROL PROGRAM, OFFSITE DOSE CALCULATION MANUAL, and radwaste treatment systems.
- n. Review of the Fire Protection Program and implementing procedures and the submittal of recommended changes to the Nuclear Review Board.

6.5.1.7 The PORC shall:

- a. Recommend in writing to the Plant Manager approval or disapproval of items considered under Specification 6.5.1.6a. through d. prior to their implementation.
- b. Render determinations in writing with regard to whether or not each item considered under Specification 6.5.1.6b. through f. constitutes an unreviewed safety question.



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NOS. 104 AND 68 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

Section 50.48, "Fire protection," of Part 50 of Title 10 of the Code of Federal Regulations (10 CFR Part 50) requires that each operating nuclear power plant have a fire protection plan that satisfies Criterion 3 (GDC 3), "Fire protection," of Appendix A to 10 CFR Part 50. The fire protection plan must describe the overall fire protection program for the facility, outline the plans for fire protection, fire detection, and fire suppression capability, and limitations of fire damage. The program must also describe specific features necessary to implement the program, such as administrative controls and personnel requirements for fire prevention and manual fire suppression activities, automatic and manually operated fire detection and suppression systems, and the means to limit fire damage to structures, systems, or components important to safety so that the capability to safely shut down the plant is ensured. The U.S. Nuclear Regulatory Commission (NRC) staff approved the Limerick Generating Station (LGS), Units 1 and 2, fire protection program in Safety Evaluation Reports dated August 1983, October 1984, May 1985, and August 1989.

By letter dated December 2, 1994, as supplemented by letter dated May 12, 1995, the Philadelphia Electric Company (the licensee) submitted a request for changes to the LGS, Units 1 and 2, fire protection program in accordance with the guidance provided in Generic Letter (GL) 86-10, "Implementation of Fire Protection Requirements," and GL 88-12, "Removal of Fire Protection Requirements from Technical Specifications." Specifically, the licensee proposed to incorporate the NRC-approved fire protection program and major commitments, including the fire hazard analysis, into the Updated Final Safety Analysis Report (UFSAR), and to revise the Operating Licenses to include the NRC's standard fire protection license condition. In addition, the licensee proposed to: 1) relocate the requirements of Technical Specifications (TS) Section 3/4.3.7.9, "Fire Detection Instrumentation," TS Section 3/4.7.6, "Fire Suppression Systems," TS Section 3/4.7.7, "Fire Rated Assemblies," and TS Section 6.2.2.e, "Unit Staff" and "Fire Brigade" from the TS to the revised fire protection program, LGS Technical Requirements Manual (TRM) Fire Protection Section; insert new pages 3/4.3-92 and 3/4.7-19 noting that fire protection LCOs and SRs have been relocated to the TRM; and revise TS Section

6.5.1.6 to include on-site review (Plant Operations Review Committee) for the Fire Protection Program, and implementing procedures and the submittal of recommended changes to the Nuclear Review Board (NRB).

GL 86-10 and GL 88-12 referred to removing fire protection requirements from TS. License amendments that relocate the fire protection requirements to the UFSAR in accordance with GL 86-10 and GL 88-12 do not revise the requirements for fire protection operability, testing, or inspections. Such amendments simply replace the fire protection TS sections with the standard fire protection license condition. The license condition implements and maintains the NRC-approved fire protection program, including the fire protection requirements previously specified in the TS, in accordance with 10 CFR 50.48. Therefore, such amendments, including the one proposed by the licensee, are administrative in nature and have no effect on the public health and safety.

The letter of May 12, 1995, provided clarifying information within the scope of the original submittal and did not change the staff's initial proposed no significant hazards consideration determination.

2.0 BACKGROUND

Section 182a of the Atomic Energy Act (the "Act") requires applicants for nuclear power plant operating licenses to state TS to be included as part of the license. The Commission's regulatory requirements related to the content of TS are set forth in 10 CFR 50.36. That regulation requires that the TS 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 TS.

The Commission has provided guidance for the contents of TS 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 TS 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." The criteria set forth in the policy statement have been incorporated into 10 CFR 50.36 (60 FR 36953).

Following the fire at the Browns Ferry Nuclear Power Plant on March 22, 1975, the Commission undertook a number of actions to ensure that improvements were implemented in the fire protection programs for all power reactor facilities. Because of the extensive modification of fire protection programs and the number of open issues resulting from staff evaluations, a number of revisions and alterations occurred in these programs over the years. Consequently, licensees were requested by GL 86-10 to incorporate the final NRC-approved fire protection program in their UFSAR. In this manner, the fire protection program, including the systems, certain administrative and technical controls, the organization, and other plant features associated with fire protection, would have a status consistent with that of other plant features described in the UFSAR. In addition, the Commission concluded that a standard license condition, requiring compliance with the provisions of the fire protection program as described in the UFSAR, should be used to ensure uniform enforcement of the fire protection requirements. Finally, the Commission stated that with the required actions, licensees may request an amendment to delete the fire protection TS that would now be unnecessary. Subsequently, the NRC issued GL 88-12 to give guidance for the preparation of the license amendment request to implement GL 86-10.

3.0 PROPOSED CHANGES

The specific TS changes proposed by the licensee are as follows:

1. Revise License Condition 2.C.(3) for both units as follows:

Philadelphia Electric Company shall implement and maintain in effect all provisions of the approved Fire Protection Program as described in the Updated Final Safety Analysis Report for the facility, and as approved in NRC Safety Evaluation Reports dated August 1983 thru supplement 9, dated August 1989, subject to the following provision:

The licensee may make changes to the approved fire protection program without prior approval of the Commission only if those changes would not adversely affect the ability to achieve and maintain safe shutdown in the event of a fire.

2. Relocate the following TS Sections and associated Bases to the TRM:

Section 3/4.3.7.9, "Fire Detection Instrumentation"
Section 3/4.7.6, "Fire Suppression Systems"
Section 3/4.7.7, "Fire Rated Assemblies"
Section 6.2.2.e, "Unit Staff", "Fire Brigade"

Two new pages 3/4.3-92 and 3/4.7-19 are being inserted containing a note which states that the fire protection LCOs and SRs have been relocated to the TRM.

3. Revise TS Section 6.5.1.6 to include on-site review (Plant Review Committee) responsibility for the fire Protection program and implementing procedures and the submittal of recommended changes to the Nuclear Review Board (NRB).

4.0 EVALUATION

The NRC staff reviewed the license amendment requests for LGS, Units 1 and 2, against the guidance provided in GLs 86-10 and 88-12. GL 86-10 requested that the licensee incorporate the NRC-approved fire protection program in its UFSAR for the facility and specified a standard fire protection license condition. GL 88-12 addressed the elements a licensee should include in a license amendment request to remove the fire protection requirements from the plant TS. These elements are (1) the NRC-approved fire protection program must be incorporated into the UFSAR; (2) the Limiting Conditions for Operation (LCOs) and Surveillance Requirements associated with fire detection systems, fire suppression systems, fire barriers, and the administrative controls that address fire brigade staffing would be relocated from the TS (the existing administrative controls associated with fire protection audits and specifications related to the capability for safe shutdown following a fire would be retained); (3) all operational conditions, remedial actions, and test requirements presently included in the TS for these systems, as well as the fire brigade staffing requirements, shall be incorporated into the fire protection program; (4) the standard fire protection license condition specified in GL 86-10 must be included in the facility operating license; (5) the Unit Review Group (Onsite Review Group) shall be given responsibility for the review of the fire protection program and implementing procedures and for the submittal of recommended changes to the Company Nuclear Review and Audit group (Offsite or Corporate Review Group); and (6) fire protection program implementation shall be added to the list of elements for which written procedures shall be established, implemented, and maintained. The licensee incorporated the NRC-approved fire protection program by reference into the LGS, Units 1 and 2, UFSAR in August 1983. The licensee has, therefore, satisfied Element 1 of GL 88-12.

The licensee stated in its submittal of December 2, 1994, that it will incorporate the current TS LCOs and surveillance requirements for the fire detection systems, fire suppression systems, and the TS requirements related to fire brigade staffing into the LGS, Units 1 and 2. Fire Protection Program. Therefore, the licensee will have satisfied Elements 2 and 3 of GL 88-12. Further, the licensee has implemented requirements for establishing remote shutdown, consistent with GL 81-12, in TS Section 3.3.7.4.

The licensee proposed incorporating the standard fire protection license condition specified in GL 86-10 for LGS, Units 1 and 2. The licensee has, therefore, satisfied Element 4 of GL 88-12.

To satisfy Element 5 of GL 88-12, the licensee addressed changes to the administrative controls sections of the TS. The licensee will require the Plant Operations Review Committee to review the fire protection program and implementing procedures as well as recommended changes as an additional responsibility. The licensee has, therefore, satisfied Element 5 of GL 88-12.

Element 6 of GL 88-12 specified that the licensee add fire protection program implementation to the administrative controls Section of the TS. This change is made to the list of elements for which written procedures shall be established, implemented, and maintained. Since TS 6.5 currently addresses the fire protection program, and this TS will remain in place following this amendment, no changes are required and the licensee has, therefore, satisfied Element 6 of GL 88-12.

The licensee's proposed TS amendments for LGS, Units 1 and 2 are in accordance with NRC staff guidance provided in GLs 86-10 and 88-12.

In summary, the licensee has proposed to incorporate the existing TS fire protection requirements as stated above into the fire protection program which is, by reference, incorporated in the UFSAR. This conforms to staff guidance in GL 86-10, "Implementation of Fire Protection Requirements," and GL 88-12, "Removal of Fire Protection Requirements from Technical Specifications," for removing unnecessary fire protection TS in four major areas: fire detection systems, fire suppression systems, fire barriers and fire brigade staffing requirements. In addition, incorporating these requirements in the UFSAR is consistent with NUREG-1433 and 10 CFR 50.36, as amended, because these TS do not impact reactor operations, do not identify a parameter which is an initial condition assumption for a design-basis accident or transient, do not identify a significant abnormal degradation of the reactor coolant pressure boundary and do not provide any mitigation of a design-basis event.

The fire protection plan required by 10 CFR 50.48, as implemented and maintained by the fire protection license condition, provides reasonable assurance that fires will not give rise to an immediate threat to public health and safety. Although there are aspects of the fire detection and mitigation functions that have been determined to be risk significant, such that Criterion 4 of 10 CFR 50.36 would otherwise seem to apply, the minimum requirements for those functions were established in GDC 3 and 10 CFR 50.48, and further controls are not necessary since the licensee must comply with these minimum requirements regardless of whether they are restated in the TS or not.

The licensee's fire protection program is required by 10 CFR 50.48, and any changes to that program are governed by 10 CFR 50.48 and license condition 2.C.(4), set forth above. Therefore, the requirements relocated to the UFSAR may be controlled in accordance with 10 CFR 50.59. Further, in a November 15, 1995, telephone call, a representative of the licensee agreed to include this Safety Evaluation in the Fire Protection license condition.